

DDPR_feedback_0172s	
Name	Tom Scott
Organisation	National Public Health Service, Southern Te Waipounamu Region
Email	Tom.Scott@southerndhb.govt.nz
Response Date	Aug 15 22
Notes	
Q1	Select the chapter you want to provide feedback on
Q2	In general, to what extent do you support the contents of this chapter?
Q3	Objective/Policy/Rule/Standard reference:
Q4	Feedback/Comments
Q5	Objective/Policy/Rule/Standard reference:
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Q9	Objective/Policy/Rule/Standard reference:
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Q12	If you need more space, or have any other general comments, please leave them here

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Mark Smith

From: Tom Scott <Tom.Scott@southerndhb.govt.nz>
Sent: Monday, 15 August 2022 3:48 PM
To: David Campbell; Katrina Clark; Plan Review
Cc: Christine Quested (HPO); Sam Anderson-Mangai
Subject: District plan review (002)
Attachments: District plan review (002).docx



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Kia ora Katrina and David,

Great to catch up just over a month ago.

Apologies for not getting back to you on this sooner.

Please see our comments on what is proposed on your District Plan Review. These are in addition to those comments provided by Dr Stephen Childs on Environment Noise issues.

I hope they are of some use as you take this process forward.

Again thanks for the opportunity to participate on this process.

Nāku iti nei

Tom Scott (he/him)

Kaiārahi - Kaupapa Here, Rautaki me te Tautoko | Team Leader Policy Strategy and Support

National Public Health Service, Southern

Te Waipounamu Region

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1. CYCLE PARKING (TRAN-S12) – Take future needs into account when planning cycle parking e.g. cycle parks for different types of cycles

1. Future proofing cycle parking will need to take into account increasing use of different types of cycles e.g. cargo cycles, adult tricycles and ebikes, increasing use of e-scooters, which can put pressure on cycle parking and an increase numbers of people cycling due to new and improved cycleways and mode shift because of climate change and health concerns
2. Consider specifying cycle parking that allows the frame and both wheels, not just one, to be secured
3. Since Oamaru is at the end of the Alps 2 Ocean cycle trail consider an end of trip facility that offers a tool station, showers and a change area, lockers and e-bike charging.
4. NZTA have developed a cycling network guidance technical note “Cycle Parking Planning and Design” available at <https://www.nzta.govt.nz/assets/resources/cycle-parking-planning-and-design/cycle-parking-planning-and-design.pdf> These guidelines provide information on preferred design for cycle parks and the spacing, layout and dimensions of different types of cycle parks

2. CYCLEWAYS – Separated cycleways are encouraged

1. People are more likely to cycle when protected cycling infrastructure is provided on roads <https://www.sciencedirect.com/science/article/pii/S2214140521003200>
2. We appreciate that with the Alps 2 Ocean cycle trail, the cycleway running from Waitaki Boys High School to Orwell St, and the separate cycle way from Weston are important in separating cyclists and vehicular traffic. We would advocate consideration is given to investigating how the cycle path intersection between Orwell Street and Humber Street could be made safer.

3. HIGHER DENSITY HOUSING - More effective land use

1. We appreciate and support that consolidation of residential activity around the commercial centres of towns. While this leads to more effective land use, it also provides for an environment that is more conducive to active transport and social interaction.
2. We support increasing the maximum building height in this zone.
3. We support a minimum for outdoor living space
4. Given in increased propensity towards active transport we would advocate the plan being silent on the matter of household units making provision for car parking on site in these zones. This is becoming increasing practice in overseas jurisdictions. [End Parking Minimums \(strongtowns.org\)](#)
5. We acknowledge that support the provisions relating to minor residential units in that it enables more flexible housing options as well as more efficient use of land.
6. Urban green spaces provide both environmental and health benefits. We encourage the provision for green space in areas where housing density is increased [Promoting health and wellbeing through urban forests – Introducing the 3-30-300 rule | IUCN Urban Alliance](#)

4. FOOD SECURITY

1. We support the protection of highly productive land from inappropriate subdivision, use or development. (Section SD-RA-02)

2. We advocate for the provision of sufficient public open spaces within walkable distance from residential allotments, especially in areas where there is housing intensification and in low income areas, where community orchards and gardens can be located should the community want these.

5. WATER- Install an accessible drinking fountain and water bottle refill station in the center of Oamaru and other drinking fountains and / or water refill stations in appropriate locations in Oamaru

1. There are few drinking water fountains in Oamaru and currently no drinking fountain/bottle filler in the center of Oamaru
2. The supply of safe drinking water is a civic, public health, and environmental issue.
 - i. Water is a healthy alternative to sugary drinks which contribute to obesity and dental decay.
 - ii. Free access to safe, clean water reduces the demand for single-use plastic bottles, which may go to landfill.
3. Public Health South has developed comprehensive, *Drinking Fountain/Bottle Filler Guidelines* (selection, position, promotion and maintenance). These free guidelines are available from Public Health South, email Christine.Quested2@southerndhb.govt.nz.

6. AGE FRIENDLY – improve outcomes for older people in Oamaru by planning for an age friendly environment

1. The proportion of the population 65 years and over in the Waitaki District is higher than the New Zealand average and it is growing [Community Profile Waitaki District - Infometrics Ltd.](#)
2. Designing for an older people will benefit everyone, including people with disabilities and parents with pushchairs/strollers and young families
3. The “Age Friendly Urban Spaces” resource for urban planners provides planning ideas to improve urban outcomes for older people. <https://officeforseniors.govt.nz/our-work/age-friendly-communities/age-friendly/> Where appropriate we encourage the use of ideas from this resource in the district plan e.g.
 - i. the orientation of new housing, likely to be occupied by older people, to streets and open space
 - ii. the provision for housing formats such as multigenerational housing that provide for different cultural practices (Pasifika people now make up 20% of Oamaru’s population).

DDPR_feedback_0202s		
	Name	Tom Scott
	Organisation	National Public Health Service, Southern Te Waipounamu Region
	Email	tom.scott@southerndhb.govt.nz
	Response Date	Jul 12 22
	Notes	See also row 176, DDPR_feedback_0172
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Mark Smith

From: Katrina Clark
Sent: Wednesday, 13 July 2022 9:29 AM
To: Plan Review
Subject: Southern District Health Board
Attachments: 180417a draft feedback on Waitaki District Plan.docx

Feedback from the SDHB on the Noise chapter.

Katrina Clark
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Waitaki
DISTRICT COUNCIL
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From: Tom Scott <Tom.Scott@southerndhb.govt.nz>
Sent: Tuesday, 12 July 2022 5:29 pm
To: Katrina Clark <kclark@waitaki.govt.nz>; David Campbell <dcampbell@waitaki.govt.nz>
Cc: Sam Anderson-Mangai <Sam.Anderson-Mangai@southerndhb.govt.nz>; Christine Quested (HPO) <Christine.Quested2@southerndhb.govt.nz>
Subject: 180417a draft feedback on Waitaki District Plan



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Hi Katrina and David,

Thanks for what was a useful meeting this afternoon.

It was useful to understand your perspectives on the issues we raised and we will commit to getting something to you in writing in due course.

As promised here is the feedback from our acoustic consultant Dr Stephen Childs.

Feel free to get back to us if you have any issues or questions relating to Dr Childs report.

Take Care and Kind Regards

Tom

Tom Scott (he/fim)

**Team Leader Policy Strategy and Support | Kaiārahi
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Reference	Comment
<p>Definitions - Noise sensitive activity</p> <p>Definitions - Sensitive activity</p>	<p>These two definitions appear to be unnecessary duplicates.</p>
<p>NOISE - Introduction</p>	<p>The sentence stating "...do not compromise..." should be rephrased or qualified to reflect that there is some compromise because absolute protection of health and amenity from environmental noise is not practicable.</p>
<p>NOISE - O1</p>	<p>The current objective conflates the control of activities and the protection of health, which blurs the primary issue of protecting health.</p> <p>This objective should be redrafted, or a separate objective added with the primary matter being to protect public health from environmental noise. Controlling noise emissions from activities to achieve that objective could then be a matter set at a policy level.</p> <p>As noted previously, the current wording "...do not compromise..." is unrealistic in this context. Such an objective is not (and could not reasonably be) given effect to by the proposed rules.</p>
<p>NOISE - O2</p> <p>NOISE - P3</p>	<p>This objective and policy should be redrafted so that the primary matter is the protection of the health of the people associated with the new noise sensitive activities in areas affected by existing and authorised environmental noise.</p>
<p>NOISE - O3</p>	<p>The overall intention that adverse noise effects from temporary activities should be managed is supported.</p> <p>The part of the objective "...ensuring that any adverse effects are minimised" should be rephrased or qualified. The proposed rules enable significant temporary noise disturbance, which might be a reasonable approach for occasional and tightly defined activity. However, this disturbance could arguably be "minimised" through further restrictions and mitigation.</p> <p>The objective should be phrased to be realistic that some disturbance is envisaged, rather than creating ambiguity in an open-ended requirement to minimise effects. The corresponding policy NOISE-P4 does qualify this requirement, but that is not consistent with the objective as currently drafted.</p>
<p>NOISE - P1</p>	<p>This policy should reference protection of health.</p>

NOISE - P4	<p>The policy refers to “permitted noise standards”. The meaning of this phrase is ambiguous and should be clarified. Specifically, is this referencing construction and temporary activity noise limits (NOISE-R10, NOISE-R11), or is this referencing noise limits set in other rules for general environmental noise?</p>
NOISE - P5	<p>The matters listed in this policy are referenced as matters of discretion for most rules in the chapter. However, not all items listed in this policy are relevant to each rule. The clarity of the rules could be improved by splitting this list so that each rule only refers to relevant matters.</p> <p>As the most critical matter, item 10 in the list should be moved to be the start.</p> <p>Item 7 refers to “frequency” and “intensity” of noise. These words have specific acoustics meanings (pitch/Hertz and watts per square metre respectively). While it is recognised that the terms probably arose from the odour assessment FIDOL factors, for application in acoustics alternative wording should be used.</p> <p>In this context, frequency could be better described as “how often the noise event occurs” rather than potentially being a characteristic of the noise when it is occurring. Intensity could be better described as “sound level” distinct from sound intensity. There is not a direct conflict with the term “offensiveness” but it would be better to use the standardised term “special audible characteristics” in accordance with NZS 6802.</p> <p>Item 9 in the list appears to imply that mitigation other than the best practicable option may be appropriate. This is not in accordance with RMA s16.</p>
NOISE - E1	<p>Item 1 is too broad to protect public health. The exemption should be limited to mobile equipment and should not include initial processing. The exemption of forestry may conflict with the National Environmental Standards for Plantation Forestry, which includes noise limits.</p> <p>Item 4(i) should not exempt aircraft immediately before/after flight or when taking off and landing from the noise standards/rules. Aircraft noise can have significant adverse effects on public health and should be subject to controls in the district plan.</p> <p>Items 6 and 7 should limit the exemption of testing, maintenance and training to specified times and durations.</p> <p>Item 9 should be deleted. Noise from crowd noise should be subject to controls, including under existing NOISE-R11</p>

<p>NOISE - R1 NOISE - R2 NOISE - R3 NOISE - R4 NOISE - R6 NOISE - R7 NOISE - R8 NOISE - R9</p>	<p>The setting of emission standards by the zone containing an activity does not adequately protect public health. There are numerous instances in the draft plan where there are inconsistent noise limits for the same sensitive receivers.</p> <p>To protect public health, noise limits (and times of application) should be set based on receiving zones where effects occur. An example of good practice in the structure of noise limits for protection of public health is the Proposed Selwyn District Plan NOISE-R1 and NOISE-REQ1. It is recommended these eight rules in the draft plan be combined and restructured into that format.</p> <p>Noise limits in the rules generally use the correct metrics as required by the National Planning Standards Noise and Vibration Metrics Standard. The values chosen for noise limits appear to be in general accordance with guidance from New Zealand Standards. The inclusion of stepped noise limits with an evening period is supported.</p> <p>The current drafting applies noise limits "...at any point beyond the site boundary", which could include roads. In accordance with guidance in NZS 6802, noise limits should apply "at any point within any other site" (or within notional boundaries in rural zones)</p>
<p>NOISE - R5</p>	<p>The reference to NOISE-S1 for matters of discretion appears to be erroneous.</p>
<p>NOISE - R7 NOISE - R8</p>	<p>Separate noise limits should be set for aircraft activity in accordance with NZS 6807.</p>
<p>NOISE - R9</p>	<p>"Vibration activities" requires explanation or definition.</p> <p>"Golden Point Historic Reserve" is not consistent with the terminology shown on the planning maps.</p> <p>A vibration limit of 10mm/s ppv exceeds criteria for building cosmetic damage, and far exceeds criteria for human disturbance. Additional criteria should be set to protect people and buildings. The frequency range for vibration limits should be at least 1 Hz to 80 Hz.</p> <p>The airblast over pressure limit of 128 dB L_{Zpeak} should be reduced to the guideline value of 120 dB L_{Zpeak}.</p>
<p>NOISE - R10</p>	<p>PER-1 should refer to the specific tables of guideline noise limits in NZS 6803.</p> <p>PER-2 should set vibration limits. ISO 4866 is an appropriate standard for measurement of vibration, but it does not contain guideline limits.</p>

NOISE - R11	<p>“Temporary event” requires definition.</p> <p>This rule should not apply to the current defined “temporary activities” as helicopter take-offs/landings and construction activities should be subject to noise limits to protect public health.</p> <p>PER-1 should include:</p> <ul style="list-style-type: none"> • limitations on the timing and duration of the actual event in addition to the limitations on sound checks/testing • limitations on the frequency of events and the total number of events each year at any site <p>PER-2 sets a relatively lenient noise limit which might be acceptable for infrequent limited duration events not extending late into the evening, but could cause adverse public health effects without appropriate limitations.</p> <p>PER-2 should include noise monitoring and management requirements for temporary events</p>
NOISE - R13	<p>In accordance with NZS 6801, the units for Ldn values should be “dB” and not “dBA”</p>
NOISE - S1	<p>The requirement should apply to all additions to buildings containing noise sensitive activities.</p> <p>The internal noise limit needs to be specified in different metrics for different sources in accordance with the National Planning Standards Noise and Vibration Metrics Standard. $L_{Aeq(24h)}$ is appropriate for road-traffic noise, but for commercial or industrial noise $L_{Aeq(15min)}$ should be used.</p> <p>The third item of this standard with reference to ISO 717-1 is inconsistent with the first item. The third item should be deleted.</p>
NOISE - S2	<p>When windows are required to be closed for noise then alternative ventilation and temperature control is required to provide thermal comfort for occupants. This is a different requirement to ventilation addressed by the Building Code. It is recommended that this rule should specify higher air flows, temperature ranges, system controls and self-noise limits. Without adequate ventilation any acoustic insulation is nullified when windows have to be opened to maintain thermal comfort.</p>
NOISE - S3	<p>The ventilation requirements should be addressed by reference to NOISE-S2, assuming it is amended to specify a system providing thermal comfort.</p>