

Submission on Tasman District Council Consultation Document for the Long Term Plan 2021-2031

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Nelson Marlborough District Health Board (NMDHB) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Tasman District Council (TDC) Consultation Document and supporting information for the Long Term Plan 2021-2031.

We see it as essential for TDC to continue to work in partnership with NMH around promoting and developing social and physical environments which will contribute to the health, wellbeing and resiliency of the local population. Of particular relevance to this submission, key issues where TDC and NMH can effectively work together are drinking water, active transport and physical activity, and healthy homes and housing affordability.

The table overleaf page outlines specific areas of the draft Plan that NMH wishes to support and includes a series of recommendations for the Council to consider.

Conclusion

NMH believes that the Tasman District Council Consultation Document and supporting information on the Long Term Plan 2021-2031 generally identifies key issues and reflects the current needs of the district.

NMH would like to offer its assistance in working with TDC on these issues.

NMH looks forward to continuing to work in partnership with TDC on activities that will be of direct benefit to the wellbeing and health of the community, and encourages TDC's continued active commitment to leading and investing in social development of our community.

NMH **wish to be heard** in support of its submission.

Yours sincerely



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Draft Plan Reference	Discussion	Recommendation / Support
Draft Community Outcomes	NMH notes that the Community Outcomes have been carried over from the 2018 Long Term Plan. NMH continues to support this approach.	Support
Te Taihū Intergenerational Strategy	NMH strongly endorses <i>Tupuna Pono</i> , and is interested in working with TDC further on this in particular on the Wellbeing & Equity Monitors	Support
Aorere Ki Uta, Aorere Ki Tai	NMH has previously engaged with TDC on the District Plan revision and is interested in having ongoing conversations.	Recommendation: that NMH further engage on the Plan
Housing (pgs 15/16)	NMH acknowledges that housing availability and affordability continue to be a major issue in the region. Housing affordability is a social determinant of health. When houses are unaffordable, then households need to make decisions about prioritising household expenditure in terms of housing payments (mortgages/rent), heating and food choices and this could lead to poorer health outcomes. NMH notes that there is no direct reference to either climate change, sea level rise or the protection of highly productive land within the Housing section. It is important that all these matters are factored into decision making. Protection of highly productive land is critical. Enabling local food production and markets means that communities have easy access for fresh food which is important for nutrition and overall health and reduces greenhouse gas emissions. As populations increase, there will be further demand for food which can increase prices resulting in the population's ability to access reasonable priced food. Therefore it is important that highly protective land is protected from urban encroachment. Brownfield development and intensification enable people to live closely to key employment areas and daily services which can be accessed by public & active transport networks. Whereas greenfield development may result in the loss of highly productive land as well creating further car dependency	Recommendation: that Option A is adjusted to focus on infill housing/intensification, as opposed to infill housing and greenfield development. Does not support: Alternative option B to enable earlier development of Lower Moutere Hills.

	which doesn't align with the goal of zero carbon 2050. Housing development should be closely tied with active and public transport infrastructure. NMH recommends that Option A which currently contains greenfield development and intensification are separated and presented as two different options. Therefore Option A should focus primarily on brownfield development, infill housing and intensification in the first instance. NMH does not support Option B to enable earlier development of greenfield sites in Lower Moutere because the land is highly productive.	
Community Housing Reserves & Facilities AMP p 28.	NMH is pleased to see that the Council plans to continue to provide the existing 101 housing units for older adults. As the population ages, and housing affordability lowers, it is important that older people on lower incomes have access to affordable housing. NMH supports the working party to investigate future options for community housing for individuals and for families of all ages, and would be happy to be involved in the working party. NMH is pleased to see that all Community Housing units are being brought up to the Healthy Homes Standards.	<i>Recommendation:</i> NMH would like to be part of the working party investigating Community housing options
Responding to Climate Change	NMH supports the range of business as usual expenditures which will have positive impacts on climate change listed on page 30. TDC could be more proactive in responding to climate change as climate change will have a significant effect on the region, and in order to mitigate the magnitude of those effects, work needs to occur now. Failing to implement healthy and equitable climate policies now accepts an avoidable burden of ill-health in future generations, disproportionately affecting already marginalised people. NMH recommends that all levels of government significantly	<i>Strongly supports:</i> Option B – Higher Investment in the short term.

	reduce emissions from today. The COVID response has shown that governments can use many mechanisms to make rapid change. Further emission reductions will contribute to reducing the risk of an overshoot beyond 1.5°C with its incrementally greater health risks.¹ Active and public transport modes provide both environmental and public health benefits such as more equitable access to transport, further reduced air pollution from reduced tyre wear and brake use, increase in physical activity and improved liveability. The targets around promoting active transport need to be more ambitious, with a focus on promoting walking/ cycling and joined up public transport routes. NMH would like to stress the importance of warmer drier homes from both an energy efficiency point of view and a health perspective. People who live in warmer drier homes tend to be healthier, with fewer GP and hospital visits and fewer days away from work due to illness. Poor housing exacerbates existing health conditions and heighten the impacts of impairment. This triggers dislocation from their communities, admission to an unnecessarily high level of care and support, and shift the cost of what is primarily a housing problem onto the health and social services sectors.² NMH notes that the alternative option B regarding higher investment in the short term makes no mention of the health benefits of the proposed investment options. Advancing active transport initiatives and supporting the local Warmer Homes programme will certainly increase the people's wellbeing. Therefore Option B is strongly supported As part of emissions reduction, NMH recommends that TDC
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¹ Watts, N. Et al. (2021) The 2020 report of The Lancet Countdown on health and climate change: responding to converging crises. *The Lancet*. 397 (10269); 129-170.

² Saville-Smith, K. & Saville, J., (2012) *Getting Accessible Housing: Practical Approaches to Encourage Industry Take-up and Meeting Need*, Centre for Research, Evaluation and Social Assessment for the Office for Disability Issues and the Ministry of Business, Innovation and Employment

	consider committing to the C40 Good Food Cities Declaration. Research released by C40 Cities revealed that food is amongst the biggest sources of consumption-based emissions from cities. NMH would support TDC signing this declaration given the commitment to aligning food procurement to planetary health guidelines, supporting in increase healthy plant based food consumption and reducing food loss and waste.	<i>Recommendation:</i> TDC work with NMH on the action point of the C40 Good Food Cities Declaration
Infrastructure Strategy	Infrastructure Priorities: NMH supports the four priority areas (Safe and secure services, Population Growth, Resilient Communities and Sustainable management). NMH notes that whilst the Strategy does include climate change adaptation as a key issue, there is no mention at all about commitments under the Zero Carbon Act to reduce greenhouse emissions. Given that the transportation emissions and construction emissions can be significant, this seems to be remiss in a Strategy that covers 30 years. The recommendations given in the recently released advice from the Climate Change Commission should be amalgamated into this Strategy. Given that TDC has placed greater emphasis to Active and Public Transport this should not be difficult to do to Transportation however more information needs to be given in regard to the construction of new infrastructure in relation to emissions.	<i>Recommendation:</i> that the Infrastructure Strategy clearly articulates how it will incorporate the key recommendations of the Climate Change Commission into the Strategy with regard to reducing emissions in relation to transport and infrastructure construction.
Water Supply Activity Management Plan	Irrespective of irrigation issues, central to the Waimea Dam is about continuity of supply and environmental improvement of rivers, NMH therefore supports Option B. NMH does not wish to comment on supply options (i.e. Waimea Dam as it considers that falls more appropriately with the community given the wide range of considerations outside of public health. Quantity of water is a public health issue and appropriate solutions to mitigate risks to drinking water	NMH supports Option B. NMH supports shown in the Infrastructure Plan (pg. 29-39) • upgrading or installing water treatment plants that provide the level of treatment required by the NZDWS • connecting Eight-Eight Valley water scheme to the Wakefield/Brightwater

	availability are supported. NMH is pleased to see that TDC continue to have a focus on water safety in regard to Water Safety Plans and Policy. With the imminent regulatory changes, TDC should aim to fully comply with future rules and standards. Proposed changes to the regulation of drinking water will reduce the role that NMH has with regard to drinking water audit and enforcement. NMH is pleased to see that the timeframes for these programmes is in the near future which will make it easier for the Council to meet the requirements of the Drinking Water Standards for New Zealand NMH supports the proposed programme of work to reconfigure and upgrade water supply infrastructure on all rural schemes. NMH supports using chlorination as a barrier in TDC's new and upgraded water treatment plant programme. NMH would like to draw the Council's attention to the press release of Hon Dr Verrall (18th March 2021) that states that <i>"The Government is proposing an amendment [the Health (Fluoridation of Drinking Water) Amendment Bill] to see that decision-making sits with the Director-General of Health... The proposed change, which will be made by a Supplementary Order Paper, simplifies the decision making and means we are taking a nationally consistent approach that's based on evidence... Given that fluoridating our drinking water is widely recognised as the single-most important initiative to improve oral health, I expect this Bill to pass this year... Local Councils are responsible for the capital and operational costs of fluoridation"</i> NMH would highlight that the press release states: <i>"There will be funding available to support local councils with fluoridation related infrastructure work."</i> TDC may wish to note this within the capital planning processes	scheme • supports the relocation of Richmond bores • district wide pipe capacity improvements • network capacity upgrades between Hope, Brightwater and Wakefield • Motueka network improvements • New/upgrading infrastructure in growth areas • Ongoing pipe renewals/leak detection NMH asks that the TDC continues to consider the appropriate timing of all the upgrades with particular regard to commitments made in Council's Water Safety Plans. NMH supports their implementation within the shortest practicable timeframe.
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Wastewater Activity Management Plan	NMH is pleased to see that TDC is proposing actions to reduce the number of overflows as these present a risk to environmental and public health. NMH supports the investment to ensure critical infrastructure is not susceptible to natural hazards and sea level rise. NMH supports the incorporation of Te Mana o te Wai into TDC water practices in particular with regard to wastewater overflows.	NMH supports the following matters shown in the Infrastructure Plan (pgs 40-45): • Refinement of the pipe renewal programme • Ongoing inflow and infiltration investigations • Rectify illegal strong connections to the wastewater network • Pump station upgrades in Wakefield, Mapua, Richmond, Pohora • MNW pump stations in Brightwater, Motueka West and Richmond South • New inland wastewater treatment plant for Motueka • Increase storage capacity
Stormwater Activity Management Plan	NMH notes that there is no significant changes to how stormwater activity will be managed since the 2018 Long Term Plan. NMH supports further investment into the primary pipe network as well as protecting and improving secondary flowpaths in order to ensure damage is minimised.	NMH supports the following matters shown in the Infrastructure Plan (46-53) • Increase the capacity of the receiving pipes and streams • Construction of new stormwater networks in growth areas • Construction of treatment wetlands • Installation of stormwater treatment devices.
Solid Waste Activity Management Plan	NMH recommends that TDC follows in NCC's example by allocating funding for the kerbside collection of kitchen waste NMH supports a new dry waste diversion bunker for construction waste at the Richmond Resource Recovery Centre (Year 1, \$400k)	<i>Recommendation:</i> that TDC offers kerbside collection of kitchen waste in Tasman townships

River Activity Management Plan	NMH supports the development of river management plans that will enable the community to set long-term goals for the river environment.	<i>Support in Infrastructure Plan (pgs 68-72)</i> - increasing capacity and strength of stopbanks that do not meet agreed levels of service - preparation of a river flooding emergency response plan - holistic river management plans. <i>Support</i>
Environmental Management Activity Management Plan	NMH continues to support TDC in its environmental monitoring programme. NMH supports the new catchment initiative to improve water quality and land management, noting that the Water Services Bill proposes additional obligations on Regional and District Council's to contribute to source water risk management plans, monitoring and management of drinking water supplies. NMH supports the completion of the Bio-Strategy NMH supports increased funding for monitoring of wetlands and Tasman Native Habitats NMH supports increased pest and weed control	
Transportation Activity Management Plan Pg 6	NMH is pleased to see that TDC has a focus on improving active transport modes and public transport services as a way of improving mode choice for residents along with relieving congestion. Investment in active transport delivers a range of social, environmental and economic benefits which include reduced congestion, emissions, and increased health and wellbeing. Active transport is becoming increasingly important for all age groups. For Tasman's ageing population, active transport offers people greater transport choice in terms of affordability and accessibility. NMH continues to support driver safety education, targeted training programmes, school transport safety programme and	NMH supports - Construction of new footpaths and the renewal of existing footpaths - Improving walking networks - Shared roads within town centre areas - Review of speed limits - Expansion of the bus services

	the total mobility scheme NMH notes that only 13% of Tasman roads are equal or less than the safe and appropriate speed. NMH continues to endorse TDC's programme to review speed limits in TDC roads. (pg79) NMH also supports funding to manage vehicle speeds around schools, road safety improvements and to convert urban residential streets into greenways.	
Active Transport	NMH supports the creation of a Walking and Cycling Strategy which identifies primary and secondary walking routes around the district. NMH is pleased to see that budgets for improving existing footpaths have been included with additional spending. (p131) NMH supports all the cycling capital projects listed on(p135-6). NMH notes that funding has been allocated to upgrades to Williams Street, Salisbury Road, Wensley to improve efficiency. It is hoped that this includes upgrades to pedestrian and cycling facilities, as well as road improvements. This is especially important given that there are at least seven educational facilities in the area from ECEs through to the secondary schools. For children, using active transport to and from school is an important way to get some physical activity each day. With the high child obesity rate in New Zealand, this is a relatively easy way to increase physical activity in children. NMH notes that \$450,000 has been allocated to the William Street Shared Path however this work will not occur until after 2031, NMH recommends that this work which aligns with the safer school programme is brought forward.	NMH supports creating an improved district wide walking and cycling network with new cycleways in Richmond, Motueka, Takaka and Mapua through the construction of protected separated cycle lanes and low intervention, buffered, on-road cycle lanes NMH recommends that the William Street Shared Path is installed prior to 2031. Note that NMH strong support of Option B Climate Change, for higher investment short term and adaptation and response.

Richmond Programme Business Case Pg 154	NMH continues to support initiatives that will encourage walking, cycling and public transport. NMH also support initiatives that will reduce severance, and increase liveability and safety in Richmond. NMH notes that the recent workshop on Richmond Programme Business Case options included options for the removal of the existing Great Taste Trail section between Hope and Richmond in order to construct the Hope Bypass. NMH sees this as a huge loss for Richmond/Hope residents. The current shared path is quiet, wide, safe with high amenity values that can be used of pedestrians and cyclists of any age and ability. This path could easily be adapted to have good connections into new subdivisions and to Gladstone Road. A path placed next to a bypass would not have the same attributes therefore will be used by fewer people. The Bypass would potentially create further severance issues which does not align with the desires of the community as stated in the 2020 survey. NMH has noted that 84% of survey respondents wanted to see TDC focus more on creating neighbourhoods rather than focusing mainly on motor vehicle transport. (Transportation AMP pg 41 & 44).	NMH advocates for the retention of the Great Taste Trail between Hope and Richmond in its current form Recommendations: that the interventions presented in the "Liveability" (no bypass) proposal and the "Accessibility" are adopted
Cycle Infrastructure Transport Asset Management Plan pg. 20	TDC has clearly demonstrated a commitment to cycling in the region through its Great Taste Trail and additional cycle routes. However NMH notes that number of bicycle stands has reduced from 20 in 2018 to 14 in 2021. Investment in good quality, easily accessible cycle parking is critical to increasing cycling as a mode of transport.³ Therefore the number and quality of bike stands in the region should be	<i>Recommendation:</i> The number of bike stands is increased across the district

³ Austroads (2016) *Bicycle Parking Facilities: Guidelines for Design and Installation*, Retrieved from <https://www.onlinepublications.austroads.com.au/items/AP-R527-16>

	assessed to see if it adequately meets demand. Cyclists need to be able to easily lock the frame of the bike directly to the bike stand, many old style racks only allow the front wheel to be locked which is not as secure given that most bikes have quick releases on their front wheels.	
Public Transport p142	NMH is pleased to see that TDC are investing heavily into Public Transport in terms of coverage of service and reduction of fares. NMH reiterates that frequency of service is vitally important for bus patrons and the proposed changes will result in a reduction of services at peak times for a number of patrons which may negate the gains made in other areas. Frequency of services needs to be revised in the Public Transport Plan NMH supports the extension of bus services across Tasman. Given the number of satellite communities between Wakefield and Richmond, a regular bus route would be a great asset to those communities especially those who are unable/ do not wish to drive. People need to weigh up whether they will pay more for accommodation close to key locations, or choose to pay for cheaper housing further away and pay more transport costs. Extending bus services provides more choice for people, this is important when housing costs continue to rise. NMH also supports the creation of a new Richmond Bus Terminus.	NMH supports the following matters shown in the Infrastructure Plan (pgs 60-61) • Extending and improving public transport services including services to Motueka and Wakefield • Extending the existing Nelson Richmond route in relation to coverage but <u>recommends</u> that the frequency in increased now rather than 2029. Brownfield development and intensification supports the case for increasing public transport service frequency.
Safety p 145	NMH supports the three capital investment programmes that will improve safety on the roads thus reducing deaths and injuries. .	NMH supports: 1. Removal of roadside obstacles that may cause accidents 2. Reactive safety improvements 3. School speed management

Library Library Services Activity Management Plan Pg 11	NMH supports the proposed feasibility study on options for the expansion of the Richmond Library. Richmond Library is a social hub for the community and it is important that the library is able to meet the needs of its growing population.	Support: the feasibility study on Richmond Library expansion.
Community Facilities Reserves and Facilities Activity Management Plan Pg 28, Pg134	NMH wants to emphasise the importance of continual investment in community facilities, these are places which can knit communities together by providing a social meeting place. NMH is pleased to see that this Reserves & Facilities AMP acknowledge the need to respond to the increasing ageing population and ensure there are sufficient facilities in place to cater for this alongside continuing to offer facilities for youth. NMH notes that a Community Facilities review strategy is being planned. If it is of assistance, the Public Health Services is happy to be involved.	NMH supports the following matters shown in the Reserves and Facilities AMP • the development of new community facilities in Brightwater/Wakefield • the development of a community pool in Motueka. NMH is happy to support work for the Community Facilities Strategy.
Drinking Fountains	As in 2018, NMH again notes that Street Furniture Inventory Summary (Transportation AMP, pg. 20) shows that there is only one drinking fountain in the Tasman Region. Given that the district is one of the sunniest in the country, NMH urges the TDC to consider increasing drinking fountains across the district when town centres are upgraded. TDC has shown its commitment to the introduction of a sugar sweetened beverages policy whereby sugar sweetened beverages are not provided or made available for purchase at council-owned buildings and events. Increasing the number of drinking fountains is another way the Council can contribute to the health and wellbeing of its citizens by giving people the option of free easily accessible water in public places.	Recommendation: that TDC increases the number of drinking fountains in the towns in the region.

Shade structures Pg 149	As in 2018, NMH again notes that there are only three shade structures in the District (Transportation AMP, pg 20). Further consideration should be given to increasing either the number of structures or suitable trees so that people are able to get refuge from the sun in the middle of the day. This is especially important for children in playgrounds to ensure that they have additional sun protection.	Recommendation: that TDC looks at the amount of shading in playgrounds in the region.
Playgrounds Reserves and Facilities AMP pg 67 / pg 206	The Reserves and Facilities AMP shows that assessment of the playgrounds was undertaken in November 2018 and that <i>the playground stock is ageing, asset renewals do not appear to keep up with the age and condition of the playgrounds.</i> In addition there were a greater number of items of play equipment that did not comply with any standards. NMH recommends that playground renewal focuses on upgrading play equipment that does not meet standards in the first instance. The compliance rating has decreased from 78% (2014) to 76% (2018). NMH recommends that TDC continually aims to increase the compliance rate over the next 10 years to achieve 100%	NMH supports the Council to continue investment in playgrounds. NMH recommends that TDC continually aims to increase the compliance rate over the next 10 years to achieve 100%
Public Toilets Reserves & Facilities AMP p 30	NMH supports the Council to review the provision of public toilets in the Region to ensure that the number of toilets meets population demand. NMH is pleased to see that a Public Toilet Policy will be developed. It is hoped that over time the number of fully accessible toilets across the district will increase.	Recommendation: that the new Public Toilet Policy will encourage the increase of fully accessible toilets across Tasman.
Parks Reserves & Facilities AMP pg 43 & 48	The Reserves & Facilities AMP (pg 43) shows the measure ensuring that "85% of residential properties are within 500m of open space." However further consideration should be given to decreasing the distance from 500m to 400m or less in new	Recommendation: that the provision of small pocket parks are increased to being within 400m or less in new developments.

	developments. Tasman's population is ageing and therefore it may be increasingly difficult for older people to walk longer distances therefore it would be more appropriate to provide more open green spaces in newer areas which residents are easily able to access. This encourages physical activity for people who are less able and also provides more places where people can congregate which is important for mental health. Research has shown that living in areas with walkable green spaces positively influenced the longevity of urban senior citizens, with one particular study showing that the factor of walkable green streets and spaces near the residence significantly and positively influenced the survival of senior citizen's independent of a person's age, sex, marital status and socio economic status.⁴ NMH also notes that the targets for the area of parkland provided per 1000 residents have been reduced. Whilst this may be difficult to strive for, access to green space is important not only from a health perspective but an environmental health perspective. Therefore NMH recommends that this target is not altered. The Reserves & Facilities AMP also notes that a key project to be undertaken in the Reserves and Facilities work programme over the next 10 years includes: • <i>Review and implement reserve management plans, with the aim of updating plans every ten years (priorities for 2021</i>	<i>Not supported:</i> NMH does not support the reduced target area of parkland provided per 1000 residents. <i>Recommendation:</i> the alcohol policy adopted for Saxton Field reserve management plan is included in the reserve management plans scheduled for review.
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⁴ Takano T, Nakamura K, Watanabe M. 2002. Urban residential environments and senior citizens' longevity in megacity areas: the importance of walkable green spaces. Journal of Epidemiology & Community Health 2002;56:913-918 Retrieved from <http://jech.bmj.com/content/56/12/913.info>

	<i>and 2022 are the Moutere-Waimea Ward and Richmond Ward reserve management plans).</i> The current reserves General Policy September 2015 contains an alcohol section which is designed to manage any adverse effects of alcohol consumption on reserves. An alcohol section was also recently included in the Saxton Field Reserve Policy which built on this policy. NMH recommends that future reviews of reserves policies include all of the alcohol control policies contained in the Saxton Field Reserves management plan. Alcohol control policies which serve to limit the users of reserves, including playgrounds, to exposure to alcohol consumption, advertising and sponsorship can support young people. Research shows that exposure to alcohol marketing for example, can result in young people drinking earlier in their lives and drinking larger amounts of alcohol. It will also be important to have consideration to alcohol policies when new recreation parks and facilities are developed, and when Council is considering the introduction of a new Concessions Policy for commercial uses of parks, reserves and community facilities, especially if these concessions will involve the sale or supply of alcohol.	
Smokefree Policy	NMH has been working closely with Nelson City Council to develop a Smokefree Outdoor Policy where smoking is banned from: • Council events • Council buildings and facilities, carparks and bus stops, • Town Centre • Beaches	Recommend that TDC works closely with NMH to develop a broader smokefree policy

	• Walkways and Cycleways The draft policy will be presented to Nelson Council this year for approval. These policies have been rolled out in numerous Councils over the past three years. NMH would like to work with TDC staff to introduce a similar policy as reducing the prevalence of smoking and de-normalising smoking behaviour is one way the Council can improve the health and wellbeing of Tasman communities.	
Stakeholders Reserves & Facilities AMP p 51.	NMH notes that in the key stakeholders list that Nelson Marlborough Health is not listed as a key stakeholder. Given that there are an important linkages between our work, NMH is interested in working closer with TDC, NMH recommends that NMH is listed as a key stakeholder.	Recommendation: NMH is listed as a key stakeholder