

# **Nelson Tasman Future Development Strategy 2022-2052**

**14 April 2022**

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## Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu o te Waka a Maui. NMH appreciates the opportunity to comment from a public health perspective on the Nelson Tasman Future Development Strategy 2022-2052.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH. NMH made an earlier submission this year on the Strategy and would like to emphasise the need for any future housing to cater to the broad range of needs of local population in terms of universal design, access to green space, housing affordability, typology and social housing.

## Specific Comments

4. NMH comments on the proposed outcomes for the Future Development Strategy (FDS) are listed below. Many of them we strongly agree/agree as NMH has previously advocated for these outcomes to be a focus of the FDS and is pleased to see that they are clearly articulated here.

5. **Q1.** *Please indicate whether you support or do not support Outcome 1: "Urban form supports reductions in greenhouse gas emissions by integrating land use transport". Please explain your choice.*

Strongly agree. NMH continues to advocate for a compact urban form as this reduces the need for long car journeys which contribute to carbon emissions.

6. **Q2.** *Please indicate whether you support or do not support Outcome 2: "Existing main centres including Nelson City Centre and Richmond Town Centre are consolidated and intensified, and these main centres are supported by a network of smaller settlements". Please explain your choice.*

Strongly Agree. The sustainable use of land and infrastructure, compact walkable neighbourhoods promoting incidental exercise and improved social interactions, and more affordable housing for smaller household sizes are just some of the benefits that urban intensification can provide, leading to improved community health and wellbeing outcomes. It is essential however that urban intensification is done sympathetically with access to green space and development of a "green" urban landscape with tree planting, good urban design that enhances the

character of the city and high quality public amenities. One benefit of urban intensification is the preservation of arable land for food production and ecologically important and biodiverse areas.

7. **Q3.** *Please indicate whether you support or do not support Outcome 3: "New housing is focused in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live". Please explain your choice.*

Strongly agree, for the reasons given above. Improvements to the transport network, in particular walking and cycling links and public transport, are vital as this supports positive health and environmental wellbeing. This type of investment supports intensification as many residents may decide not to own private vehicles.

8. **Q4.** *Please indicate whether you support or do not support Outcome 4: "A range of housing choices are provided that meet different needs of the community, including papakainga and affordable options". Please explain your choice.*

Strongly agree. Nelson Marlborough has a higher proportion of its population in the 65+ year age group than other New Zealand regions. Consideration needs to be given to providing a number of 1 and 2 bedroom units to cater for older people. In addition, larger units could be added to cater for those with larger families and those living in multi-generational households. Encouraging the development of different housing typologies and multi-generational family housing options is important for supporting community diversity and equity by enabling a wide range of community members to live including those from different socio-economic groups and ethnicities.

9. **Q5.** *Please indicate whether you support or do not support Outcome 5: Sufficient residential and business land capacity is provided to meet demand. Please explain your choice.*

Agree. Consideration needs to be given to providing for a mixed use of activities in new residential areas so that essential services such as health centres, community spaces, cafes and small supermarkets are close by. Having mixed use developments improves people's access to work opportunities, especially low income earners. Mixed use can also help create more socially diverse environments as everyone can have equal access to facilities regardless of whether they own a car. Local employment creates strong connections with the community which in turn enhances individual wellbeing.

10. **Q6.** *Please indicate whether you support or do not support Outcome 6: New infrastructure is planned, funded and delivered to integrate with growth and*

*existing infrastructure is used efficiently to support growth. Please explain your choice.*

Strongly agree. It is essential that there is an integrated approach taken to infrastructure planning and funding and delivery. This provides efficiencies in the networks. Investing in sufficient high quality infrastructure, including the three waters, roading, and public transport supporting infrastructure is an investment in the future and is essential for the ongoing development of the region.

11. **Q7.** *Please indicate whether you support or do not support Outcome 7: Impacts on the natural environment are minimised and opportunities for restoration are realised. Please explain your choice.*

Strongly agree that impacts on the natural environment must be minimised, this is to ensure that environmental health is not degraded as a result of development. Freshwater values, including Te Mana o te Wai, need to be protected from inappropriate use and development and those water bodies that have degraded water quality and need to be restored. NMH recommends that water sensitive design principles are used to mitigate the potential impacts from urbanisation whilst negating the existing degraded water quality impacts from current rural land use. The preservation of areas of significant ecological value and biodiversity is important for future wellbeing of communities. Preservation and protection should be prioritised as approaches and the option to create environmental impacts requiring restoration used only where necessary.

12. **Q8.** *Please indicate whether you support or do not support Outcome 8: Nelson Tasman is resilient to and can adapt to the likely future effects of climate change. Please explain your choice.*

Strongly agree. It is commendable to see that TDC is addressing climate change through promoting compact urban forms that minimises the need for car travel and it promoting public and active transport modes. This is important as transport is a key contributor to greenhouse gases in the district. In addition, climate change will affect those living in low-lying coastal regions. Locating development away from hazard prone areas is a key component to creating resilient populations.

13. **Q9.** *Please indicate whether you support or do not support Outcome 9: Nelson Tasman is resilient to the risk of natural hazards. Please explain your choice.*

Strongly agree. Flooding can cause significant damage to property and people. Storm surges in coastal environments and heavy and prolonged rainfall can lead to flooding of low-lying areas. It is important for Councils to avoid development in high risk areas and prioritise investment in effective storm water management solutions including storm water detention basins and diversions from low-lying

areas. Intensive residential development may increase site coverage of impervious surfaces requiring effective storm water management to reduce the risk of flooding. In addition, development on land that is susceptible to liquefaction and/or landslides should be avoided.

NMH notes in the Technical Report (page 20) that broad assessments on flooding, potential liquefaction areas and slope instability have not been undertaken for Tasman District. Extreme weather events exacerbated by climate change can cause flooding and slips. Therefore NMH stresses the importance for Tasman District Council to undertake assessments in relation to the FDS planning to ensure that development does not occur on hazard prone land.

**14. Q10.** *Please indicate whether you support or do not support Outcome 10: Nelson Tasman's highly productive land is prioritised for primary production. Please explain your choice.*

Strongly agree. Consideration also needs to be given to protecting the productive soils in Nelson and Tasman. The Ministry for the Environment's Our Land 2018<sup>1</sup> report states that urban expansion is reducing the availability of some of our most versatile productive land. Nationally, between 1990-2008, 29% of new urban areas were on some of the most versatile land. Creating new developments on greenfield land will have an impact on the productivity of the land around the townships. Protecting land for food production and avoiding urban encroachment were matters of national importance in the RMA's predecessor, the Town and Country Planning Act 1977. It is important that arable land is retained and enhanced rather than being converted into housing. Highly productive land grows better food more cheaply and with fewer environmental consequences. It is vital to protect horticultural land that surrounds towns and cities so that cheaper locally grown produce can get to local communities thus supporting the local economy. Access to cheaper fruit and vegetables is vital for people to maintain good health. Therefore NMH recommends that productive soils is protected.

**15. Q11.** *Please indicate whether you support or do not support Outcome 11: All change helps to revive and enhance the mauri of Te Taiao. Please explain your choice.*

Strongly agree. NMH strongly endorses the mission statement in relation to iwi and hapū aspirations: *Toitū te marae a Tane-Mahuta, Toitū te marae a Tangaroa,*

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<sup>1</sup> <http://www.mfe.govt.nz/sites/default/files/media/RMA/Our-land-201-final.pdf>

*Toitū te tangata: If the land is well and the sea is well, the people will thrive.* This mission statement aligns with public health outcomes.

16. **Q12.** *Regarding the FDS outcomes, do you have any other comments or think we have missed anything?*

NMH does note that the following outcomes have not been included as priority areas and NMH continues to advocate for their inclusion

- a. Social housing is considered as an important component of housing supply
- b. NMH would like to see the adoption of inclusionary zoning into greenfield developments. Inclusionary zoning can offer opportunities to expand access to affordable housing and to encourage economic opportunity by reducing the proportion of family income spent on rent, building wealth through homeownership, and creating or preserving mixed-income neighbourhoods. Local governments should be able to use inclusionary zoning, which requires a portion to be retained for affordable housing, as rental or for-sale units, in return for benefits such as fast-tracked consenting, density bonuses, zoning variances, reduced mandatory fees, or other appropriate incentives. Inclusionary zoning is one of a range of tools to use where there is a mismatch between what the market is delivering and what the local community needs to house its workforce and under-served communities. Queenstown Lakes District Council, with developer support, piloted this policy to show how low-moderate income New Zealanders can get into safe, warm, affordable homes. The Council has combined this with shared home ownership and rental programmes<sup>2</sup>. Research on this project found no significant variation in house price changes in Queenstown between houses neighbouring affordable properties and control groups and that the benefits clearly outweigh any risks. The planning provisions need to require retention of the affordable housing in perpetuity in the social sector, or similar. The likes of Community Action Nelson and Habitat for Humanity could be engaged in the process
- c. As intensification occurs, provision and access to green space becomes increasingly important for people's mental and physical health as well as the urban ecology

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<sup>2</sup> [Research finds that having an affordable home next door provides wider community benefits with no negative effects \(communityhousing.org.nz\)](https://communityhousing.org.nz)

- d. House affordability can impact people's wellbeing therefore it is essential that houses remain affordable so that people can have the option of purchasing a property for their financial security
- e. A high percentage of housing is built using life-time design principles so that older people, families with young children and people with disabilities can comfortably live in the house. Given that the region has a higher proportion of people over 65, it is important that housing enables people to "age in place"
- f. The existing housing stock is predominately 3-4 bedrooms but the demographics of the region are changing with an increased demand for smaller houses therefore new housing needs to reflect this demand.

**17. Q13.** *Do you support the proposal for consolidated growth along State Highway 6 between Atawhai and Wakefield but also including Mapua and Motueka and meeting needs of Tasman rural towns? This is a mix of intensification, greenfield expansion and rural residential housing. Please explain why?*

Strongly agree

NMH supports the proposed developments along State Highway (SH) 6 between Wakefield and Atawhai along with development around existing Tasman towns. There are a range of benefits from this approach:

- a. The cost efficiencies of close living within smaller areas of land make it possible to provide drinking water, wastewater, and sewerage services with lower set-up and maintenance costs per individual.
- b. There are environmental benefits, such as the lower volume of land and other resources needed to support the same population e.g. efficient public transport is possible in a sufficiently dense area and this can reduce energy consumption per capita.
- c. Proximity to transport corridors mean that people can easily walk and cycle or use public transport to get to key destinations. This caters to the ageing population who want to easy access to services and shops.
- d. Intensification can allow for a greater diversity of housing to suit a range of incomes and household structures.

NMH is pleased to see that this consolidated growth reduces the need to develop on greenfield sites subject to significant natural hazards, flooding risk or coastal inundation.

18. **Q14.** *Where would you like to see growth happening over the next 30 years? Tick as many as you like.*

Yes: Largely along the SH6 corridor as proposed

Yes: Intensification within existing town centres

No: Expansion into greenfield areas close to the existing urban areas

No: Creating new towns away from existing centres (if so, tell us where):

No: In coastal Tasman areas, between Māpua and Motueka

Yes In Tasman's existing rural towns

No: Everywhere

19. **Q15.** *Do you agree with prioritising intensification within Nelson? This level of intensification is likely to happen very slowly over time. Do you have any comments?*

Strongly agree. Prioritising the intensification close to amenities and services is necessary in providing for the region's ageing population to "age in place" (live at home into your older years). Older persons generally state a strong preference for living in their own home or non-institutional community settings. Private homeownership has been associated with better health outcomes for older people as it alleviates the financial pressures and anxiety associated with high accommodation costs and minimal security of occupancy. Subsequently there is a growing demand for smaller houses and properties.

Additionally, adults living with a disability are more likely to be living alone or with a partner only. NMH considers that an increase in the availability of smaller, easy care properties close to amenities and services may go towards providing greater independence and more housing choice.

However, in addition to encouraging smaller compact properties, housing also needs to be functional. Key factors include accessibility (ease of entering and navigating in and around the home) and adaptability (to cater for changing needs such as experiencing an injury or disability).

NMH supports the planned mixed use spine for Vanguard Street/St Vincent Street and Waimea Road as this area is well serviced by active transport links and it is close to essential services, schools and places of employment.



NMH is pleased to see that Nelson City Council is taking a cautious approach through the Dynamic Adaptive Planning Pathways process to ensure that places that are susceptible to coastal inundation and flood risk are not built upon.

**20. Q16.** *Do you agree with the level of intensification proposed right around the centre of Stoke? Any comments?*

Agree. Please refer to our answer for Q15 above. NMH support intensification in Stoke along the key transport lines.

**21. Q17.** *Do you agree with the level of intensification proposed in Richmond, right around the town centre and along McGlashen Avenue and Salisbury Road? Any comments?*

Strongly agree. Please refer to our answer for Q15 above.

**Q18.** *Do you agree with the level of intensification proposed around the centre of Brightwater? Any comments?*

Agree in terms of the proposals for residential and commercial land around Brightwater. Consideration also should be given to expanding cycling routes from Brightwater through Hope to Richmond. Whilst the Great Taste Trail provides cycling opportunities for recreational users, those wishing to commute by bicycle may wish for a more direct route and this should be considered within transport infrastructure plans.

**22. Q19.** *Do you agree with the level of intensification proposed near the centre of Wakefield? Any comments?*

Agree. NMH also supports the extension of public transport services to Wakefield and the proposed improvements to the cycling network.

**23. Q20.** *Do you agree with the level of intensification proposed in Motueka (greenfield intensification and brownfield intensification)? Any comments?*

Strongly Agree. NMH agrees with the approach taken given the technical difficulty with greenfield expansion in terms of coastal inundation, flood risk and the proximity to highly productive land. In terms of intensification, consideration also needs to be given to improving the stormwater network so surface flooding risks are minimised.

NMH supports the extension of public transport services to Motueka and the proposed improvements to the cycling network.

**24. Q21.** *Do you agree with the level of intensification proposed in Māpua (intensifying rural residential area to residential density)?*

Strongly Agree. NMH supports the approach taken to intensify the rural residential area to residential noting that infrastructure upgrades will be required.

NMH supports improvements to the public transport network which include connections to Motueka and Richmond.

25. **Q22.** *Do you agree with the location and scale of the proposed greenfield housing areas in Nelson? Please explain why.*

Neutral. NMH has lodged a separate submission on the Mahitahi Bayview Plan Change. In that submission, we have stressed the importance of universal design requirements, the need for affordable housing and the adoption of inclusionary zoning, a variety of typologies, the adoption of a Life Cycle Assessment to provide useful information to support eco-efficient and to reduce the climate impact of buildings, further investment in prioritising walking and cycling routes, and requirements for cycle and electronic scooter parking, and the creation of accessible recreational areas.

26. **Q23.** *Do you agree with the location and scale of the proposed greenfield housing areas in Stoke? Please explain why.*

Neutral. Please refer to our comments to Q22. It is critically important that any new development is well integrated into the public and active transport networks. Given the proposed number of houses for this area, additional support may be required for Stoke Centre in order for it to be able to service the expanded community.

27. **Q24.** *Do you agree with the location and scale of the proposed greenfield housing areas in Richmond? Please explain why.*

Neutral. Please refer to our comments to Q5, Q22 & Q23. The proposed greenfield development is predominately away from the centre of Richmond. Consideration needs to be given to provision of daily services which people can easily access through active modes rather than having an emphasis on urban sprawl where people will be forced to rely on their vehicles. The Business sites (T-035 & T-122) could become Mixed Use sites where commercial activity and residential is encouraged especially as these sites are on the main trunk link.

28. **Q25.** *Do you agree with the location and scale of the proposed greenfield housing areas in Brightwater? Please explain why.*

Neutral. Please refer to our comments to Q5, Q22 & Q23. T-001 is situated quite far from the town centre and it is important that there are good active transport connections so people can access their local services.

29. **Q26.** *Do you agree with the location and scale of the proposed greenfield housing areas in Wakefield? Please explain why.*

Neutral. The intended greenfield development of Wakefield will lead to a sprawled township. It is important that any large scale greenfield development is well supported with good transport links, and easy access to local services.

30. **Q27.** *Do you agree with the location and scale of the proposed greenfield housing areas in Motueka? Please explain why.*
- Agree. Please refer to our comments to Q5, Q14, Q22 & Q23. The Rural residential block is situated quite far from Motueka itself so again it is important that active transport links are established between the two areas.
31. **Q28.** *Do you agree with the location and scale of the proposed greenfield housing areas in Mapua? Please explain why.*
- Neutral. Please refer to our comments to Q5, Q22 & Q23. The intended greenfield development of Mapua will lead to a sprawled township. It is important that any large scale greenfield development is well supported with good transport links, and easy access to local services.
32. **Q29.** *Do you think we have got the balance right in our core proposal between intensification and greenfield development (approximately half intensification, half greenfield for the combined Nelson Tasman region)?*
- Neutral. NMH supports the primary proposal especially in regards to development along SH6. NMH would like emphasis to fall primarily on intensification because this will get more significant gains in terms of consolidating infrastructure, emissions reductions especially if further investment is placed on improving public transport along SH6 and SH60, and active transport around towns. However, if greenfield development occurs sporadically across the district, this dilutes the infrastructure funding and a lower level of service may be provided.
33. **Q30.** *If you don't think we have got the balance right, let us know what you would propose. Tick all that apply.*
- More intensification & less greenfield expansion
34. **Q31.** *Do you support the secondary part of the proposal for a potential new community near Tasman Village and lower Moutere (Braeburn Road)? Please explain why.*
- No. NMH does not support this secondary proposal. NMH questions the need for further development in Tasman Village for the following reasons
- a. Te Atiawa have expressed significant concerns about this site and this does not align with the outcome listed above "to revive and enhance the mauri of Te Taiao"
  - b. Expansion of this township will increase emissions as people will need to travel to employment and services. This does not align with the outcome listed above "The urban form supports reductions in greenhouse gas emissions". This could be mitigated by further investment of public and

active transport however this may dilute other needed transport investment in the key towns along SH6. This is especially important as the consultation document already acknowledges that further investment in public transport frequency across existing urban area and to Wakefield is already required.

- c. That development in this area will require a significant loss of some highly productive land. This is again incompatible with the Outcome that "*Nelson Tasman's highly productive land is prioritised for primary production*" NMH again wishes to reiterate the importance of retaining highly productive land. This is especially important as the core proposal will lead to some reduction of highly productive land along SH6. Therefore it is important that other areas of the District can protect their productive land.
- d. Given the proximity of Motueka and Mapuā towns, intensification in and around Motueka and Mapuā are higher priorities

35. **Q32.** *Do you agree with the locations shown for business growth (both commercial and light industrial)? Please explain why.*

Neutral. NMH does not support the expansion of a light industrial area on highly productive land.

36. **Q33.** *Let us know if there are any additional areas that should be included for business growth or if there are any proposed areas that you consider are more or less suitable.*

No comment

37. **Q34.** *Do you agree with the proposed residential and business growth sites in Takaka?*

Agree. Further to this is the issue of typology. The FDS indicates that managed greenfield expansion will occur in Takaka, Murchison, Tapawera, St Arnaud and in Golden Bay. NMH understands that while there is demand indicated for this, NMH notes an absence of planning for intensification in those towns in terms of smaller lot sizes and smaller properties, and for required infrastructure and community amenity. It is well-understood that rural towns attract people who wish to have larger lot sizes, however given our ageing population, there will be a certain proportion of the population who may wish to downsize because they may not wish to manage large sections but there may not be any 1-2 bedroom houses available to they may be forced to relocate to another town. Smaller houses are usually more affordable and will appeal to people on limited incomes.

NMH recommends consideration is given to providing for some controlled intensification areas in rural towns.

38. **Q35.** *Do you agree with the proposed residential and business growth sites in Murchison?*

Agree but please refer to our answer to Q34 above.

39. **Q36.** *Do you agree with the proposed residential and business growth sites in Collingwood?*

Agree but please refer to our answer to Q34 above.

40. **Q37.** *Do you agree with the proposed residential and business growth sites in Tapawera?*

Agree but please refer to our answer to Q34 above.

41. **Q38.** *Do you agree with the proposed residential and business growth sites in St Arnaud?*

Agree but please refer to our answer to Q34 above.

42. **Q39.** *Let us know which sites you think are more appropriate for growth or not in each rural town. Any other comments on the growth needs for these towns?*

No comment

43. **Q40.** *Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback*

No comment.

## **Conclusion**

44. In summary, NMH supports development approaches that avoid sea level rise and building on productive land. NMH recommends that intensification occurs on areas close to shops and services and key transport corridors.

45. NMH thanks Nelson City Council and Tasman District Council for the opportunity to comment on the Future Development Strategy 2022-2052.

Yours sincerely



Lexie O'Shea  
**Chief Executive**