



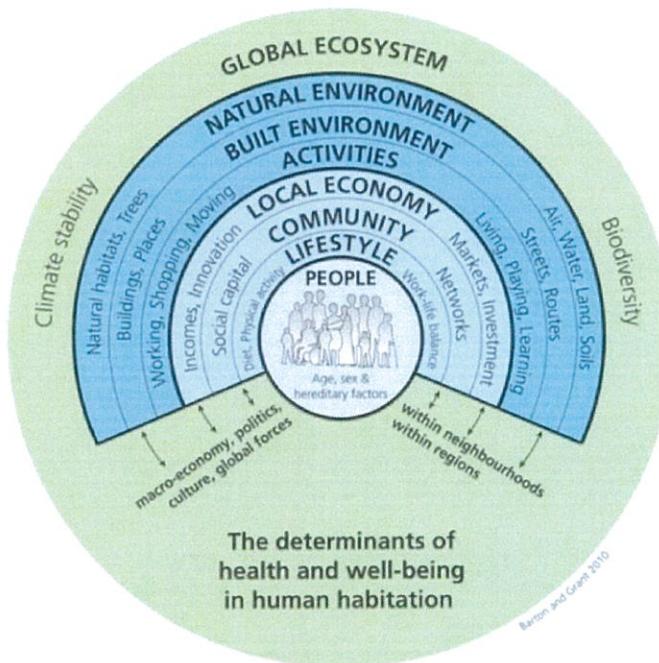
# **Submission on Marlborough District Consultation Document for the Long Term Plan 2018-2028**

**14 May 2018**

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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 along with Marlborough District (MDC) has a responsibility for reducing adverse environmental effects on the health of people and communities and to improve, promote and protect their health pursuant under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956. NMH welcomes the opportunity to comment from a public health perspective on the MDC Consultation Document and supporting information for the Long Term Plan 2018-2028. The Long Term Plan shows a commitment to the long term health and wellbeing of Marlborough residents.

We see it as very important for NMH to continue to work in partnership with MDC around promoting and developing social and physical environments which are likely to contribute to the health, wellbeing and resilience of the local population. The conditions in which people live, work and play are impacted by a range of environmental, social and behavioural factors which are referred to as the 'social determinants of health'. The diagram<sup>1</sup> below shows how the determinants are complex and interlinked.



<sup>1</sup> 2 Barton, H and Grant, M. (2006) A health map for the local human habitat. The Journal of the Royal Society for the Promotion of Health 126 (6) [http://eprints.uwe.ac.uk/7863/2/The\\_health\\_map\\_2006\\_JRSH\\_article - post\\_print.pdf](http://eprints.uwe.ac.uk/7863/2/The_health_map_2006_JRSH_article - post_print.pdf)

Most of these determinants of health fall outside of the health sector. NMH recognises MDC's crucial role in the health and wellbeing of our population, in particular in the prevention of health problems.

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

Of particular relevance to this submission, key issues where MDC and NMH can effectively work together are drinking water treatment, waste management, active transport, healthy homes and housing affordability.

### **Conclusion**

NMH believes that the Marlborough District Council Consultation Document and supporting information on the Long Term Plan 2018-2028 generally identifies key issues and reflects the current needs of the district.

NMH would like to continue working with MDC on these issues.

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

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

Yours sincerely



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Draft Plan Topic	Discussion	Recommendation / Support
<b>Community Outcomes</b>	<p>NMH notes that the Draft Long Term Plan does not include a section on community outcomes. Community outcomes provide a context for the Plan and show how the Council aims to achieve the outcomes in terms of social, economic, cultural, environment interests. The community outcomes can show the strategic direction to the overall plan and give clarity to the public along with Council staff.</p>	<p><i>Recommendation:</i> MDC include Community Outcomes into the Long Term Plan</p>
<b>Collaborative work</b>	<p>MDC and NMH has a statutory responsibility to ensuring the wellbeing of communities. NMH would like the opportunity to continue to engage with MDC at a strategic and operational level on work that intersects both organisations. Joint work plans could be used to prioritise and monitor work between NMH and MDC</p>	<p><i>Recommendation:</i> MDC and NMH consider formally collaborating on work that is common to both organisations.</p>
<b>Transportation</b>	<p>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 Marlborough's ageing population, active transport offers people greater transport choice in terms of affordability and accessibility.</p> <p>Given that the Government Position Statement on Land Transport has emphasised the importance of Active Transport, NMH encourages MDC to explore options for further investment into active transport. This could include broadening the funding for the Bikes in Schools programme across the district.</p> <p>NMH is pleased to see that the performance target for footpaths is to provide footpaths that meet the needs of an ageing community. Physical activity among older people has been linked to better cognitive performance, reductions in</p>	<p>NMH supports the following matters shown (Council Activities Summaries, pg. 5)</p> <ul style="list-style-type: none"> <li>• Road safety programmes</li> <li>• Projects within the Growing Marlborough Strategy to upgrade town amenities</li> </ul> <p><i>Recommendation:</i> that funding continues to be provided for the Bikes in Schools Programme</p>

Draft Plan Topic	Discussion	Recommendation / Support
<p>morbidity and mortality and increased mental wellbeing. It is important that surface conditions and kerb transitions of footpaths and walkways in the region are regularly reviewed to ensure that the risk of falls is minimised. The inclusion of a new measure looking at the response rate to service requests for footpaths will assist the Council respond to problem areas.</p>		<p>NMH supports the following matters shown (Consultation document pg. 5)</p> <ul style="list-style-type: none"> <li>• Marlborough Kaikoura Trail</li> <li>• Link Pathway</li> </ul> <p><i>Recommendation:</i> that MDC continues to review its pedestrian and cycle network to ensure that there is easy connectivity across the region.</p> <p><i>Recommendation:</i> that MDC assesses the number and quality of the bike stands in the region.</p> <p><i>Recommendation:</i> that reduced car use be given a great profile in Council plans with further investment given to promoting public transport use, walking and cycling.</p>
<p><b>Walking and Cycle Infrastructure</b></p>	<p>MDC has clearly demonstrated a commitment to cycling in the region through its cycle trails in particular to the Marlborough Kaikoura Trail and the Link Pathway</p>	<p>The draft Government Policy Statement on Land Transport (GPS) 2018/19 identifies support for mode shifts to lower emissions forms of transport including walking and cycling. This recognises the importance of urban form for creating liveable cities that value public space. NMH views the development of walking and cycling infrastructure as fundamental for the promotion of active transport and its associated health benefits.</p> <p>In light of the direction of the GPS, NMH recommends that reduced car use be given a great profile in Council plans with further investment given to promoting public transport use, walking and cycling.</p> <p>In addition, to the construction of cycle paths, investment in good quality, easily accessible cycle parking is critical to increasing cycling as a mode of transport.<sup>2</sup> Therefore the number and quality of covered bike stands in the area should be assessed to see if it adequately meets demand. Cyclists</p>

<sup>2</sup> Austroads (2016) *Bicycle Parking Facilities: Guidelines for Design and Installation*, Retrieved from <https://www.onlinpublications.austroads.com.au/items/AP-R527-16>

<b>Draft Plan Topic</b>	<b>Discussion</b>	<b>Recommendation / Support</b>
	<p>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.</p> <p>NMH supports the inclusion of a new measure to relating to the level of services for walking and cycling paths. This will help the Council maintain high standards.</p>	<p><i>Recommendation:</i> that any investment into new technologies supports either people's physical wellbeing and/or environmental wellbeing.</p>
<b>Technological Change in Transport</b>	<p>Rapid technological change may lead to different demands on the transport network. The LTP does not mention technological changes for transport. If MDC should wish to consider technological change, NMH encourages the Council to invest in technology that will either promote active transport and/or reduces the environmental effects of transport i.e. emission free technology, noise and community severance. This could, for example, be done through providing greater access to recharging stations for electric cars, or the use of electric buses.</p>	<p>NMH supports the work that MDC is currently undertaking to upgrading the Taylor Dam and improving the Lower Wairau Drainage Network</p>
<b>Flood Management</b>	<p>NMH is supportive of the measures that MDC have put into place to safeguard residents from the risks of flooding and erosion.</p>	<p>NMH supports the following (Council Activities Statement: Water pg 5)</p> <ul style="list-style-type: none"> <li>• New Seddon treatment plant</li> </ul>
<b>Water Supply</b>	<p>NMH supports the range of projects that will improve the quality of water including the new Seddon treatment plant and the proposed upgrades to the Havelock, Renwick, Wairau</p>	<p>NMH supports the following (Council Activities Statement: Water pg 5)</p> <ul style="list-style-type: none"> <li>• New Seddon treatment plant</li> </ul>

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	<p>Valley treatment plants and the new plant for the Riverlands supply.</p> <p>NMH is pleased to see that the Council has adopted an "active" leakage programme in Renwick, Seddon, Picton &amp; Havelock as this will improve the efficiency of the network.</p> <p>NMH is pleased to see that the LTP includes performance measures that reflect compliance with Part 4 and 5 of the DWSNZ. Approved and implemented Water Safety Plans are a requirement for all supplies over 500 population and for those supplies of less than 500 population, if they opt to comply with section 10 of the DWSNZ. NMH considers that compliance with this requirement, given that it demonstrates a holistic approach to ensuring drinking water safety, would be another appropriate performance measure.</p> <p>NMH is pleased to see that MDC intends to achieve virtually 100% compliance with sections 4 and 5 of the DWSNZ by 2021.</p> <p>There is mention of water shortages for Havelock supplies and use of water meters as a management tool to delay the need to find more water. However, there is no indication of funding for new source investigations or infrastructure in the 10 year life of the LTP.</p> <p>The Health (Fluoridation of Drinking Water) Amendment Bill is working its way through Parliament. If NMH acquires the power to make decisions and give directions about the fluoridation of local government drinking water supplies, NMH is keen to enter into discussions with MDC to discuss the Act's implications for the Marlborough district.</p>	<ul style="list-style-type: none"> <li>Proposed upgrades to the Havelock, Renwick, Wairau Valley treatment plants. Given that the Health Act deadlines are now passed, these upgrades should happen as soon as is practicable, and no later than the 2020-21 timeframe indicated. New plant for the Riverlands supply</li> <li>Active water leak reduction programme</li> </ul> <p><i>Recommendation:</i> that MDC work towards all supplies being compliant with Part 4 &amp; 5 of the DWS.</p> <p><i>Recommendation:</i> that MDC include approved and implemented Water Safety Plans for all supplies as a performance measure.</p> <p><i>Recommendation:</i> Identify a commitment to the investigation of new sources and/or the infrastructure to provide additional water for Havelock.</p>

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<b>Wastewater</b>	<p>NMH supports ongoing investment into upgrading the wastewater network between Waikawa and Picton as this will make the network more resilient in storm events.</p> <p>NMH supports the upgrade of the Seddon and Havelock wastewater treatment plants</p>	<p>NMH supports the following matters shown in Council Activities Statement: Sewage pg. 4</p> <ul style="list-style-type: none"> <li>• Completion of the Picton trunk main upgrade to reduce and control overflows</li> <li>• Upgrade the Nelson St Pump Station, Blenheim and related mains</li> <li>• Rebuilding of the Mail Outfall Pump Station at Riverlands</li> <li>• Increasing treatment capacity at BSTP to meet continuing growth in trade waste.</li> </ul>
<b>Stormwater</b>	<p>NMH is pleased to see that MDC is continuing to invest in ways to reduce stormwater egress into the wastewater network as contaminated stormwater entering the network may increase the risk to public health (e.g. risk to recreational water users).</p> <p>NMH is supportive of the measures that MDC is initiating to mitigate flood risks including the maintenance of tree plantings for riverbank erosion protection purposes. NMH encourages MDC to also use native plantings to minimise erosion.</p>	<p>NMH supports the following matters shown in the Council Activities Statement pg 3</p> <ul style="list-style-type: none"> <li>• Implementation of the Blenheim Stormwater Strategy Area Plans</li> <li>• Ensure there are sufficient options for stormwater disposal in areas that are experiencing growth and retro-fit existing reticulation where required</li> </ul>
<b>Fresh water</b>	<p>NMH is pleased to see MDC's ongoing commitment to improving freshwater health in the district through a wide variety of programmes.</p>	

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<b>Waste Management</b> <p>NMH supports the relocation and expansion of the hazardous waste centre as a dedicated facility will reduce the harmful effects of these materials on both the environment and the public. (Consultation document pg 7)</p> <p>NMH supports the upgrade to the landfill gas system.</p> <p>NMH would like to work with MDC to reduce the waste produced by healthcare it provides</p>	<p>NMH supports the following matters shown in the Council Activity Summaries: Solid Waste pg 2</p> <ul style="list-style-type: none"> <li>• Hazardous Waste centre</li> <li>• Upgrade to the landfill gas system</li> </ul>	<p>NMH supports the following matters shown in the Council Activities Statement: Environment pg 4</p> <ul style="list-style-type: none"> <li>• Monitoring programmes determining the effects of winery waste discharge and sediment runoff</li> <li>• Monitoring programme on the effects of agriculture spray drift</li> <li>• Further investment in biodiversity and the marine environment</li> </ul> <p><i>Recommendation:</i> that the funding lines for environmental monitoring increase in order to allow for inflation.</p>
<b>Environment</b>	<p>NMH supports increased funding to environmental science and monitoring as this funding will allow MDC to meet its obligations under the National Environment Standards for Assessing and Managing Contaminants in Soil and the National Policy Statement for Freshwater Management (pg 7 consultation document).</p> <p>NMH supports the breadth of monitoring programmes that MDC plans to undertake but notes that the funding for each monitoring programme remains static over 10 years. Given that costs inevitably rise, it would be prudent to increase funding in order to offer the same level of service each year.</p>	<p>NMH supports MDC's approach to emergency management and natural hazard resilience.</p> <p>NMH supports the mitigation approaches related to natural hazards and climate change in terms of emergency management responses.</p>
<b>Emergency Management</b>		

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<b>Social / Community Facilities</b> Pg 19	<p>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.</p> <p><b>Facilities</b></p> <p>NMH supports the re-development of the Lansdowne Park, Blenheim Riverside Precinct, Blenheim library redevelopment and Awatere Community Hall. NMH encourages MDC to work closely with the Youth Council and Accessibility groups to ensure that community developments are easily accessible and attractive to all age groups. In the design of community hubs, NMH encourages MDC to include breastfeeding facilities where mothers can have a quiet space to feed their infants.</p> <p>NMH commends MDC for its new library in Picton which will be a great asset for the community.</p>	<ul style="list-style-type: none"> <li>• NMH supports the following matters shown in the (Council Activities Statement: Community Facilities pg. 2</li> <li>• Re-development of Lansdowne Park</li> <li>• Awatere Community Hall</li> <li>• Increasing and improving public toilets</li> </ul> <p>NMH supports the following matters shown in the (Council Activities Statement: People pg. 6</p> <ul style="list-style-type: none"> <li>• Blenheim Riverside Precinct</li> <li>• New Art gallery in Blenheim's library</li> </ul> <p>Recommendation: consideration for the inclusion of breastfeeding facilities and infant changing facilities is included in any redevelopment of community facilities.</p>
<b>Parks and active recreation (pg 69)</b>	<p>NMH supports the new reserves going into new developments. 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</p>	<ul style="list-style-type: none"> <li>• NMH supports the following matters shown in the (Council Activities Statement: Community Facilities pg. 5</li> <li>• New reserves at Westwood, Burleigh and at Omaka Landings</li> </ul>

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<p>longevity of senior citizens independent of a person's age, sex, marital status and socio economic status<sup>3</sup>.</p> <p>NMH is pleased to see that MDC has included new measures relating to the level of services for sports parks including the development of Sports Facilities Plans. This will help the Council maintain high standards.</p>	<p>NMH notes that MDC is investing in playground renewals at Pollard Park and the Picton Foreshore. As part of the playground renewals, consideration should be given to increasing the number of shade structures or suitable trees, preferably native, 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.</p> <p>Consideration should also be given to whether playgrounds have a drinking water fountain. Adequate hydration is important especially in the warmer months. MDC 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 that MDC can contribute to the health</p>	<p>NMH supports the MDC to continue investment in playgrounds (Council Activities Statement: Community Facilities pg. 2 )</p> <p><i>Recommendation:</i> that MDC looks at the amount of shading in playgrounds in the region</p> <p><i>Recommendation:</i> that MDC reviews the number of water fountains available in playgrounds.</p>
<p><b>Playgrounds</b></p>		

<sup>3</sup> 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.bmjjournals.org/content/56/12/913.info>

Draft Plan Topic	Discussion	Recommendation / Support
	<p>and wellbeing of its citizens by giving people the option of free easily accessible water in public places.</p> <p>NMH supports the inclusion of playgrounds into the new subdivision developments as this provides more opportunities for children to play and exercise, as well as providing for a social meeting point for communities.</p> <p>NMH is pleased to see that MDC has included two new measures relating to the level of services for playgrounds. This will help the Council maintain high standards.</p>	<p>NMH supports the ongoing commitment of MDC into a range of projects that support health and wellbeing in the community in terms of Community Support. NMH supports MDC's commitment to funding for community events because these events strengthen the sense of identity and social bonds in a community which is important for wellbeing.</p> <ul style="list-style-type: none"> <li>• Youth Initiatives Plan</li> <li>• Safer Communities</li> <li>• Community based events.</li> </ul>
<b>Community Support</b>		<p><i>Recommendation:</i> Housing affordability is given a greater profile within the LTP</p>
<b>Housing</b>	<p>Housing affordability and availability has become an issue in Marlborough. Housing costs in the Marlborough area are high compared to many other parts of New Zealand. The Massey University Home Affordability Report sets out the home affordability index for each region, being a comparison of the average weekly earnings against the median dwelling price and the average mortgage interest rate. The latest report (March 2018) shows that the home affordability index for Nelson Marlborough is 22.77. This compares with some of the more affordable housing areas of Wellington (home affordability</p>	

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	<p>index of 21), Taranaki (14), Otago (15.7) and Manawatau/Wanganui (13.4).<sup>4</sup></p> <p>The expense of housing can put families into poverty, and poverty is an important determinant of health, therefore NMH supports the development of policies that provide affordable good quality housing as an important for public health.</p> <p>Although housing generally reflects rather than creates socio-economic position, affordability has an influence in terms of:</p> <ul style="list-style-type: none"> <li>• access to quality housing,</li> <li>• where people live and thus social and economic opportunities,</li> <li>• home ownership and the benefits of stability that this offers, and</li> <li>• income available for other needs such as food, heating and health care.</li> </ul>	<p>NMH supports the ongoing commitment of MDC into healthy homes. It is important that homes are adequately heated which leads to a better quality of life. People who live in warmer homes tend to be healthier, with fewer GP and hospital visits and fewer days away from work due to illness. Cold, damp houses are associated with an increased rate of respiratory and cardiovascular conditions as well as depression and anxiety. NMH supports the heating and insulation programmes in the Plan. These programmes all seek to improve the living</p> <p>NMH supports the following projects (Council Activities Statement: People pg. 16):</p> <ul style="list-style-type: none"> <li>• Home insulation programme</li> <li>• Solar water heating programme</li> <li>• Home clean heating programme</li> </ul>

<sup>4</sup> <http://www.massey.ac.nz/massey/fms/Colleges/College%20of%20Business/School%20of%20Economics%20&%20Finance/research-outputs/mureau/home-affordability/Home%20Affordability%20March%202018.pdf>

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	<p>standards for Marlborough residents to ensure that they have healthy homes</p> <p>Consideration should be given to adopting a rental warrant of fitness scheme where landlords can examine the basic health and safety components of their properties.<sup>5</sup></p>	<p><i>Recommendation:</i> A voluntary rental WOF programme is adopted by MDC.</p>
<b>Smokefree Environments</b>	<p>Tobacco smoking is still the most important preventable cause of cancer in Marlborough. Smoking also causes heart disease. Cancer, along with heart disease are the two predominant cause of preventable premature mortality in Marlborough.</p> <p>NMH is, therefore, very pleased that MDC has a Smokefree Position Statement and Policy. NMH would like to see MDC build on this success by extending its Policy. The Fresh Air Project, the smoke-free outdoor dining trial has been taking place in Nelson/Tasman since December 2017. Preliminary results of the project have shown that 96% of people surveyed in the Nelson/Tasman trial supported smokefree outdoor dining areas. Given the success of this trial and similar trials in Ashburton and Christchurch, NMH wishes to see MDC adopt a broader Smokefree Outdoor Policy where smoking is not permitted in:</p> <ul style="list-style-type: none"> <li>• alfresco dining areas</li> <li>• beaches</li> <li>• the principal entrances and exits of Council buildings and facilities, carparks and bus stops,</li> </ul>	<p><i>Recommendation:</i> that MDC extends its smokefree policy to a broader outdoor policy.</p>

<sup>5</sup> <https://wellington.govt.nz/services/rates-and-property/property/rental-warrant-of-fitness>

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	<ul style="list-style-type: none"> <li>• shared public spaces</li> <li>• council housing</li> </ul> <p>Auckland City Council is in the process of rolling out this type of policy<sup>6</sup>. Reducing the prevalence of smoking and de-normalising smoking behaviour is one way the MDC can improve the health and wellbeing of Nelson communities. Tasman DC have also indicated that they will review their Smokefree Policies.</p>	<p><i>Recommendation:</i> that MDC implements a Local Alcohol Policy</p>
<b>Reducing Alcohol harm</b>	<p>Intoxication with alcohol<sup>7</sup> is the main cause of alcohol-related harm in New Zealand society, leading to risk-taking behaviour, road traffic and other accidents, injuries from falls and drowning, assaults, self-inflicted injury, and acute alcohol poisoning.</p> <p>There are social costs from the use and abuse of alcohol, to drinkers themselves, to others they come into contact with, and to the whole of New Zealand society. Costs range from avoidable morbidity and mortality, hospital presentations, aggression and violence, and crime, to harmful effects on family relationships, friendships and social life, schooling, study and employment opportunities, and financial problems.</p> <p>NMH recommends that MDC continues to implement a Local Alcohol Policy for the region that covers the following matters:</p>	

<sup>6</sup> <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-policies/Pages/smokefree-policy.aspx>

<sup>7</sup> <https://www.sialliance.health.nz/UserFiles/SouthIslandAlliance/File/PDFs/DHBPositionStatementFINAL08%2003%2012.pdf>

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	<ul style="list-style-type: none"> <li>a) Distances between sensitive sites e.g. early childhood centres, schools, alcohol rehabilitation clinics and the location for new outlets.</li> <li>b) Density of existing venues</li> <li>c) Effects of late night licensed premises on the surrounding environment.</li> </ul>	NMH supports the engagement of a Te Ao Maori cultural adviser to improve its long term relationships with Maori and fulfil its obligations as a Treaty partner. The Treaty is a document that assures "the wellbeing of Maori and non-Maori by recognising the importance of such factors as social and economic aspirations which are actively promoted under the Treaty" <sup>8</sup> therefore NMH supports MDC desire to work in partnership with local iwi.
<b>Treaty of Waitangi</b>		NMH supports the engagement of a Te Ao Maori cultural adviser to improve its long term relationships with Maori and fulfil its obligations as a Treaty partner. The Treaty is a document that assures "the wellbeing of Maori and non-Maori by recognising the importance of such factors as social and economic aspirations which are actively promoted under the Treaty" <sup>8</sup> therefore NMH supports MDC desire to work in partnership with local iwi.

<sup>8</sup> : Programme Evaluation: An Introductory Guide for Health Promotion Andrew Waa, Francesca Holibar, Carla Spinola, Alcohol and Public Health Research Unit / Whariki Runanga Wananga Hauora Mete Paekaka, University of Auckland, Auckland, 1998 (in publication) Retrieved from <http://www.hauora.co.nz/resources/TowandHP.pdf>