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Submission to Waikato Regional Policy Statement Change 1 – National Policy Statement on Urban Development 2020 and Future Proof Strategy update

Introduction

Waikato Regional Council includes Waikato, and Taupo (including Turangi) health districts which combined serve a population of over 500,000 people in the Waikato region.

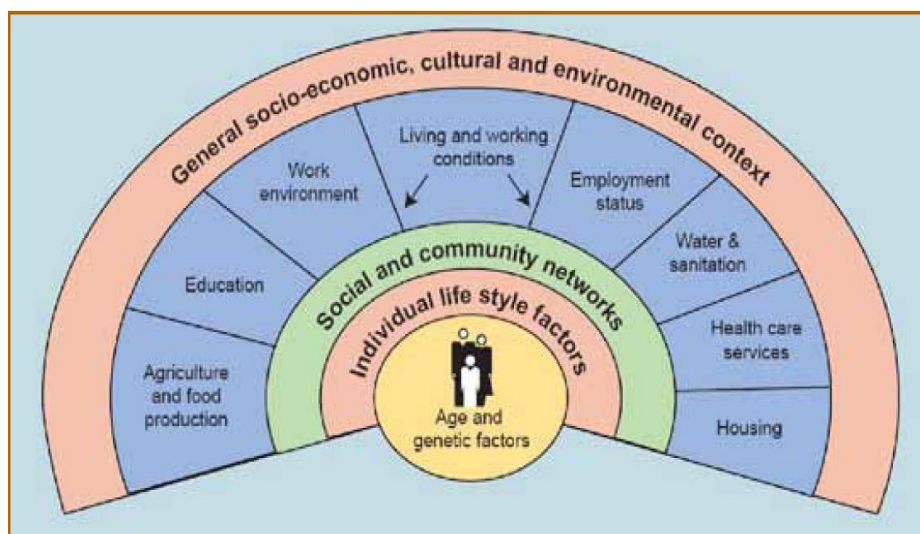
This submission has been prepared by Toi Te Ora Public Health which has responsibility for Taupo health district. All public health services share the purpose to improve, promote and protect the health of their population with a focus on reducing inequalities in health, therefore this submission should be helpful for other health districts.

Public health is about promoting wellbeing and preventing ill health. Many of the crucial underlying factors that contribute to improving, promoting, and protecting the health of people and communities are directly influenced by the decisions and activities of councils.

Individual and community health outcomes are shaped by the environments within people live and work but also the influences of health behaviours, health services and delivery. Therefore, it is crucial that these aspects are intertwined into all policies and plans, particularly the built (including urban) environment.

The determinants of health help demonstrate how these key factors impact each other and individuals' health and wellbeing. The further away the factors are from the individual, the less control the individual has over those factors. This is shown in Figure 1 (Dahlgren and Whitehead 1991).

Figure 1. The social model of health



For these reasons, Toi Te Ora is committed to working collaboratively with Waikato Regional Council (Council) and welcomes the opportunity to provide feedback to update the Waikato Regional Policy Statement to incorporate the requirements of the National Policy Statement on Urban Development 2020 (NPS-UD) and to reflect the updated Future Proof Strategy

General

In line with the National Policy Statement – Urban Development, we fully support the addition of Te Tiriti o Waitangi principles into the regional policy statement. We also support that these principles underline all decisions, and that local and regional councils work in partnership with Iwi.

Toi Te Ora acknowledges the significance of enabling intensification to promote healthy environments. This is because when our environments support our health and promote wellbeing – individuals, and communities’ flourish. To do this, it is important that urban development processes include:

- healthy, safe, and resilient communities
- wai ora – healthy environments
- equity
- climate change mitigation and adaptation

These key processes are expanded on in a recent publication from The Ministry of Health, [‘Principles for healthy urban development’](#) which Toi Te Ora contributed to the development of. This can now be found on the Te Whatu Ora – Health New Zealand [Urban Development](#) website page.

It is important to note that urban unplanned development has the potential to be detrimental to the wellbeing of the whole community. Our urban environments can expose us to health risks but can also promote health and wellbeing. Good urban planning can ensure safer environments and reduce risk behaviours. Toi Te Ora would like to see the urban form and development policies of the regional policy statement include the need to assess the environmental impacts of development to human health. This would enable the associated risks to be improved or mitigated with healthy urban planning and design and safeguarding the direct and wider community health impacts of development.

Toi Te Ora supports a biophilic public health approach. This recognises that for humans to thrive and be healthy, we need the natural world around us to be flourishing and healthy. Biophilic cities is an international urban development and design planning concept that benefits the environment and health. Biophilic cities recognise the importance of daily contact with nature as an element of meaningful urban life and prioritises the restoration of nature. Through various actions, including urban design and planning, biophilic cities look at ways to support inhabitants to benefit from the biodiversity and wild urban spaces present in cities. The [Biophilic Cities Network](#) contains resources that can support urban planning and design. For example “[Planning for Biophilic Cities](#)” provides strategies and tools that demonstrate how nature can be integrated into plan-making and regulation of urban environments to support human well-being, ecological health and sustainable cities in an equitable way.

The concept is aligned to Wai Ora and the core kaupapa of Māori understanding that the health of nature and of people is entwined and interconnected.

The World Health Organization Source Book Directory is a global online repository of resources and tools for integrating health and urban territorial planning. The Source Book Directory provides information about the importance of planning and designing urban areas from a health perspective, as well as concrete guidance on how to do it regardless of user knowledge level the entry point of interest. It is intended to be useful for public health practitioners and stakeholders involved in urban planning and design, to support their work towards developing healthy urban environments.

The recently published Sourcebook Directory includes a reference and link to Toi Te Ora Biophilic Public Health work (under the Resources tab, row 128). To learn more about biophilic public health and how this plan change could take this approach into account, go to <https://toiteora.govt.nz/public/biophilic-public-health/>.

We have various position statements which may assist Council in developing criteria for assessing private plan changes and enable intensification of urban environments in a healthy way. These include; [active transport](#), [built environment](#), [food security](#), [housing and health](#) and [sanitary services](#).

Proposed changes to ‘Part 1 – Introduction and General Provisions’ section 1

Proposed changes to ‘1.6 Definitions’ section 1

Toi Te Ora Public Health supports the inclusion of Inclusionary Zoning which requires a certain proportion of new residential development to be provided as affordable housing and retained as affordable for future generations. This is because a healthy home brings together three key aspects: the physical conditions of the house, the suitability of the house for its occupants, and the affordability of the house. Affordability, together with quality, safety, and suitability of housing are important determinants of health and wellbeing.

Proposed changes to ‘SRMR – significant resource management issues for the region’ section

SRMR-12 – Effects of climate change, SRMR-14-Managing the built environment, SRMR-PR4 – Managing the built environment

We support Council in understanding the importance of reducing greenhouse gas emissions along with being resilient to the current and future effects of climate change. While providing the ability for urban environments to be resilient to climate change, Council also needs to consider improving and promoting the health and wellbeing of its community by continuously improving community resilience. For example, not allowing new developments in areas that have an increased risk of natural hazards and taking an approach that will reduce the number of people in harm’s way.x

To ensure development of the built environments is healthy, large-scale development must be located (or provide) good accessibility between housing, employment, community and other services and open space. In relation to what is considered good accessibility, it is a development that achieves all aspects mentioned in SRMR-PR4, and we would advise that Council goes further by increasing active transport, which will reduce motor vehicle dependency, and reduce emissions.

Proposed changes to 'IM – Integrated management' section

IM – Integrated management objectives, IM-O1 – Integrated management, IM-O2 – Resource use and development, IM-O3 – Decision making, IM-O5 – Climate change, IM-O8 – Sustainable and efficient use of resources.

This section is significant for public health and the community. Promoting dense urban development will allow walking and cycling and public transport to be more viable. Increasing density makes community sanitary services more affordable, increasing access and public health protection. However, intensification has risks such as increasing the spread of infectious diseases due to people living closer together and more people exposed to the environmental impacts of urban development such as noise pollution, loss of privacy and the ability to grow food and play outdoors at home.

Evidence shows that our urban environments and associated lifestyles contribute to the rates of long-term conditions in communities (Canterbury DHB, 2016). Our built environments influence both our behaviours and our exposure to factors that increase the risk of developing various health conditions (Kochtitzky, et al., 2006). For example, our urban environments shape how convenient physical activity is, our exposure to second-hand tobacco smoke, our exposure to alcohol sponsorship and alcohol availability, and how easy affordable healthy food options are to access in our neighbourhoods.

People living near busy roads or by other noisy activities are at increased risk of various health effects such as cardiovascular disease, insomnia, tinnitus and psychophysiological problems such as cognitive impairment in children.

Road accidents are more frequently associated with urban areas, including both minor and serious accidents. Internationally the number of minor accidents in urban areas increase relative to population size (Cabrera-Arnau, Curiel, & Bishop, 2020).

Noise pollution can also contribute to mental wellbeing, when experienced alongside other negative experiences over time (Humpheson, 2019). Noise pollution can come from many sources, including heavy traffic or industry. However, its impacts can be reduced through careful land use and urban planning. This includes ensuring that industry and heavy traffic are adequately separated from residential areas and other sensitive land uses such as marae and education facilities.

Urban development should not increase population density in areas known to be of high risk to natural hazards, particularly areas that have multiple natural hazard risks. Furthermore, prior to zoning land for structure planning and development, we suggest that the social and mental wellbeing effects of natural hazard impacts to public health are considered when assessing whether urban development is appropriate in a location.

We would advise that the social and mental wellbeing effects of natural hazard impacts to public health are considered in addition to whether a site is significantly constrained when addressing natural hazards. To do so will support urban environments to be resilient to the current and future

effects of climate change and enhance amenity through healthy, safe and sustainable built environments.

We support policy aligning to intensification and infill which are two key aspects of urban development. Unless that is, infill is in hazardous environments, such as areas that will be impacted by climate change and natural hazards.

From a public health perspective to achieve integrated and sustainable growth management, large scale urban growth must address connectivity to existing urban development from the outset.

EIT-M4 Regional land transport plan

Toi Te Ora supports this policy. But we would like to see attention given to the ongoing improvement of the transport network to make it easier to get around by promoting active transport and more sustainable transport options such as buses and bikes.

Proposed changes to UFD – Urban form and development section

Objectives, UFD-P1 – Planned and co-ordinated subdivision, use and development, UFD P2 – coordinating growth and infrastructure, UFD-P11 – Adopting Future Proof land use pattern, UFD-P18 – Tier 3 local authority areas outside the Future Proof Strategy, APP13 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities.

We support the proposed changes to the built environment objectives and wish to emphasise the importance to public health that all infrastructure required to serve new development is available. It is our experience that infrastructure which is programmed or planned and does not have consent provides insufficient certainty. Development should not occur unless all infrastructure required to serve new development is available or approved from the outset. Otherwise, there is a risk of development without adequate infrastructure. For instance, households serviced by onsite systems once isolated and remote, become communities better serviced by a centrally located reticulated scheme because the onsite systems no longer provide the level of health protection necessary to ensure people are separated from their waste. However, to provide adequate infrastructure in retrospect can take years and meanwhile, the health of the community is compromised. This is an example why it is in no one's interest to allow growth and development without suitable infrastructure from the outset.

Addressing capacity and supply issues for reticulated water and sewerage systems is essential for public health. This is particularly the case in terms of development because individual onsite sewage systems are not suitable for growing communities and access to a sufficient supply of safe water is a basic requirement for human health. Professionally designed and maintained reticulated systems, like those operated by local authorities, are the most protective of public health. Therefore, it is crucial for the future wellbeing of our communities, that developments are planned with reticulated services that are professionally designed and operated from the outset.

Toi Te Ora support's restricting urban development or urban-like activities in the areas that are not supported with urban amenities, services, etc, and other public health infrastructure that supports safe and healthy communities like footpaths, lighting, and critical infrastructure.

Providing quality open spaces is an important policy that provides individuals and communities with connectedness. It is important to ensure that built environment policy also includes high levels of accessibility for when higher density development is likely to have less outdoor area on the residential lot. When considering open spaces, it is important to consider private and public

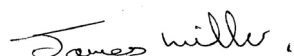
open spaces within urban development to ensure everyone, no matter where they are, can access quality open space for their mental and physical wellbeing.

When Council considers whether a development protects and provides for human health, and contributes to a well—functioning urban environment, as mentioned elsewhere in this submission, it is recommended that the social and mental wellbeing effects from natural hazards and climate change to the public be considered. Areas that are prone to natural hazards and climate change will have significant impact to communities and are particularly important for the protection of human health. Prior to releasing land for structure planning and development, we suggest that the social and mental wellbeing effects of natural hazard impacts be considered when addressing amenity, climate change and natural hazards.

Proposed changes to ‘Part 5 – Appendices and maps’ section

Toi Te Ora supports the general development principles for urban development and the specific rural-residential development policies to manage inappropriately located subdivision use and development. While the separation between incompatible land uses will provide the best protection for human health, ensuring development is also well connected with existing and planned development and infrastructure will protect the environment from contamination, which is a necessity for current and future populations. Furthermore, ensuring the necessary water is available to support development and that development is planned and designed to achieve the efficient use of water, will improve the sustainability of the natural environment and in the long-term protect public health.

Toi Te Ora is available to discuss any point raised in this submission.



Dr Jim Miller
Medical Officer of Health