

17 October 2019

Ministry for the Environment  
Environment House  
23 Kate Sheppard Place  
Thorndon, Wellington

**Re: Planning for successful cities - a proposed National Policy Statement on Urban Development**

Tēnā koe,

Thank you for the opportunity to provide a written submission on this discussion document.

Regional Public Health (RPH) serves the greater Wellington region, through its three district health boards (DHBs): Capital & Coast, Hutt Valley and Wairarapa and is based at the Hutt Valley District Health Board.

We work with our community to make it a healthier and safer place to live. We promote good health, prevent disease, and improve the quality of life for our population, with a particular focus on children, Māori and working with primary care organisations.

The reason for this submission is to ensure that the public health opportunities and risks associated with this National Policy Statement are considered. The Ministry of Health requires us to reduce potential health risks and promote good health by various means, which includes making submissions on resource management matters. The proposal covers issues that may have potential health effects on people and communities.

We are happy to provide further advice or clarification on any of the points raised in our written submission. Thank you for the opportunity to make this submission.

The point of contact for this submission is:

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Naku noa, na

Dr Jill McKenzie  
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## Question 1:

### **Do you support a National Policy Statement on Urban Development that aims to deliver quality urban environments and make room for growth? Why/Why not?**

Regional Public Health (RPH) **supports** the proposed National Policy Statement on Urban Development (NPS-UD) and its intent to enable growth by providing clear directives to Councils with regards to the planning system. In particular, we **support** the intent to encourage quality urban environments, ensuring growth is strategically planned and leads to well-functioning cities that contribute positively to people's well-being.

The policy and legislative environment that spans housing and urban environments is complex – from homelessness (supply and demand) and housing quality, to decisions that impact on transport choices, air quality and physical activity. The impacts of decisions made around housing and urban environments is not equal for all groups in our communities. Māori, Pacific, lower-income, migrants and refugees, people with disabilities, children and the elderly are disproportionately impacted by decisions that impact housing and urban environments.

There is a significant housing need in many urban environments, and the wider Wellington region that Regional Public Health covers is no exception. The current policy and legislative model means that councils are often making changes slowly and ad hoc. During a time with a strong focus on growth, it is important to balance development of quality urban environments while opening up opportunities for development.

Given that policy and legislation significantly affects housing and urban design quality and housing supply, a National Policy Statement on Urban Development can support changes to Council plans and consenting processes, ensuring that they are tailored to their community. Urban development that improves the well-being of the community requires strong engagement and input from the community. Regional Public Health believes that a National Policy Statement provides a consistent planning direction while still allowing for flexibility and response at individual community and neighbourhood levels.

From a public health perspective, we are especially supportive of a national direction that facilitates high quality urban intensification as a means to support growth. Compact growth supports improved health and well-being outcomes via increased opportunities for active transport, recreation and social interaction, improved air quality, as well as supporting local economies.

#### **- Are there other tools under the RMA, other legislation or non-statutory tools that would be more effective in achieving a quality urban environment and making room for growth?**

Another tool which will be important to support the NPS–UD is the use of spatial planning. We note the discussion document signals that spatial planning will be considered as part of the upcoming RMA review process. Having spatial planning inserted into our legislative framework will support the intent of the NPS–UD and improve effectiveness of this non-statutory tool (outside of the Auckland Council area).

We would also like to acknowledge other non-statutory tools that can lead to quality urban environments including a Health in All Policies approach. In our experience, working with council planners to utilise frameworks that consider who benefits from development and who misses out, and ensuring meaningful community engagement in processes, can lead to positive outcomes for

well-being from quality urban development. Some examples of these frameworks include the Integrated Planning Guide<sup>1</sup> and New South Wales Healthy Development Checklist<sup>2</sup>.

#### **Question 2:**

**Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments? Why/why not?**

RPH **supports** the approach of targeting the most directive policies to our largest and fastest growing urban environments. The simplification of two categories (major urban centre and all urban centres) is straightforward while also recognising the demand on all urban centres, and the NPS-UD itself, will require significant financial and human resources that small councils may not have. It is important to place the highest requirements on councils whose decisions impact the greatest number of people. In addition, these councils have a larger rating base from which to fund improvements in the urban environment.

- **Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?**

RPH is pleased to see the inclusion of six Councils located in the Wellington region, recognising the increasing housing demands across this region, and the necessity for these Councils to proactively respond to the current and future need.

#### **Question 3:**

**Do you support the proposed changes to Future Direction Strategies (FDSs) overall?**

We are especially **supportive** of the proposed Policy P1E around engagement with neighbouring local authorities.

#### **Question 4:**

**Do you support the proposed approach of the NPS-UD providing national level direction about the features of a quality urban environment? Why/why not?**

RPH **supports** the use of a preamble to explain the intent of the NPS-UD and would like to see the inclusion of the following elements of quality environments:

- Providing opportunities for social interactions and leisure activities, especially for less connected communities;
- Promoting active transport for commuting and leisure;
- Promoting access to wholesome, affordable, and locally-produced food.

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<sup>1</sup> <https://www.cph.co.nz/wp-content/uploads/IntegratedPlanningGuideV3.pdf> accessed 9 Oct 2019

<sup>2</sup> <https://www.health.nsw.gov.au/urbanhealth/Publications/healthy-urban-dev-check.pdf> accessed 9 Oct 2019

The additional points above reflect elements of the urban environment that create a supportive environment for wellbeing.

Achieving quality urban design requires involvement of communities in meaningful decision-making processes. This means discussions and engagement with communities to better understand important components of a place and how people might engage and use a space. Thus, quality urban environments require collaboration with communities to support the creation of neighbourhoods that meet the diverse needs and cultural identities of its residents. Representative and meaningful community engagement is a key enabler which is currently missing from the requirements.

While the preamble is helpful, RPH **recommends** that the link between the preamble and the objectives are strengthened to better ensure clarity for councils around a “quality urban environment”.

- **Do you support the features of a quality urban environment stated in draft objective O2? Why/why not?**

For the draft objective O2, Regional Public Health would like to strengthen the link between the proposed pre-amble to the NPS-UD and this objective. We believe that the pre-amble description can be linked to the four parts of the proposed objective. Our concern is that without key words in the pre-amble that are explicitly linked to the objective, some critical aspects for achieving quality urban environments could be lost.

RPH **supports** the emphasis on achieving equitable outcomes for everyone, provided by O2, where councils are required to make it possible for **all** people, whānau, communities and future generations to provide for their well-being.

To strengthen the links between O2 and the preamble, RPH **recommends** including additional points to O2:

- e) Prioritising public and active transport options;
- f) Incorporating climate change mitigation and adaptation strategies;
- g) Supporting and involving existing community networks

- **What impacts do you think the draft objectives O2–O3 and policies P2A–P2B will have on decision-making?**

There is limited reference to open space and the protection of green spaces, as well as any reference to promoting resilience to the impacts of natural hazards and climate change. RPH also **recommends** that the wording of P2A be adapted to say:

- a) Enabling a range of dwelling types and locations, working environments, ~~and~~ business locations *and open space*

As well as including an additional point for decision-makers to consider:

- c) Ensuring resilience to the impacts of natural hazards and climate change.

## Question 5:

### **Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not?**

RPH **supports** the clarification that amenity values are diverse and change over time.

RPH has engaged with Hutt City Council's (HCC's) District Plan change 43 that seeks to provide for medium density residential development and suburban mixed use in targeted areas. The majority of the submissions were against the proposed changes with amenity being a key component (e.g. effects on access to sunlight (shading), privacy, visual amenity, views, increase in noise, and loss of vegetation)<sup>3</sup>. In this case, amenity was primarily argued in static terms for a few concerned citizens rather than over time for the common good. Alongside this, HCC sought to address issues of amenity of future medium density development through the use of a design guide, which included directives on cladding and appropriate vegetation. RPH sought to influence HCC by suggesting changes to the design guide, specifically looking at concepts such as creating a sense of place and collaborating with local community in order to ensure wellbeing. However, the council's view of amenity was, as noted in this document, limited largely to views and vegetation, things they had greater ability to control.

#### **- Do you think these proposals will help to address the use of amenity to protect the status quo?**

The proposed changes open up the interpretation of amenity and reduces the opportunity for those concerned about change and its impact on their way of life, to use amenity to protect the status quo.

RPH **recommends** that for P3A to achieve the intention of supporting change, this requires further clarification on how decision-makers understand and make informed decisions, given variations between individuals and communities and changes over time. RPH **recommends** the development of a guide for decision-makers on how to achieve input from a wider range of communities, especially those who traditionally have less power and representation in the planning process. This includes Māori, Pacific peoples, migrant and refugee communities, older people, youth, people living with disabilities, and lower income families and individuals. There are successful examples of this wider engagement process in urban development that can be shared and utilised<sup>4</sup>.

#### **- Can you identify any negative consequences that might result from the proposed objective and policies on amenity?**

As noted above, it is unclear how decision-makers can take these considerations into account. The current framing on amenity could lead to confusion and ad hoc decision-making.

#### **- Can you suggest alternative ways to address urban amenity through a national policy statement?**

The New Zealand Urban Design Protocol's Key Urban Design Qualities (the Seven Cs) provide useful guidance<sup>5</sup>. RPH has observed that while these were referenced by HCC in their medium density

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<sup>3</sup> Officer's Report for Independent Hearing Commissioners, 26 July 2019, <http://iportal.huttcity.govt.nz/Record/ReadOnly?Tab=3&Uri=5368037>

<sup>4</sup> For example: capturing the voice of tamariki in the Pomare Lower Hutt Housing NZ redevelopment, Rise Up! A Pomare Community Project <http://hps.tki.org.nz/content/download/1537/7067/file/Pomare%20-%20final.pdf> accessed 15 Oct 2019; or outcomes from involving community members in village planning in this 2011 Ministry of Health report <https://www.health.govt.nz/publication/achieving-healthy-urban-planning-comparison-three-methods> accessed 15 Oct 2019

<sup>5</sup> The 2005 Ministry for the Environment's own Urban Design Protocol identifies seven essential design qualities that create quality urban design: the seven Cs. They are: Context, Character, Choice, Connections,

guide, there was a strong focus on character and choice but very little consideration for custodianship or collaboration. RPH **recommends** that the NPS could require the Council to give effect to all of the Seven Cs of the New Zealand Urban Design Protocol to meet Objective 4.

#### **Question 8:**

**Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not?**

As previously stated, we are especially **supportive** of policies that facilitate high quality urban intensification as a means to support growth and improve health and well-being outcomes. We agree that this is most likely to be achieved where there is good access to jobs and services, and proximity to public and active transport links. We also note the challenges that one of our councils has in achieving this type of intensification, with the slow pace of change negatively impacting the most vulnerable communities who have been pushed further away from jobs and services, face additional financial burdens, and have lost quality time spent with family.

- **What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?**

Regional Public Health prefers the descriptive approach so the plan can be tailored to specific areas and respond to community preferences. It will be important to ensure that community voice is sought, if this approach is favoured, to avoid bias towards those individuals and groups concerned about protecting the value of their existing investments.

#### **Question 10:**

**Do you support limiting the ability for local authorities in major urban centres to regulate the number of car parks required for development? Why/why not?**

- **Which proposed option could best contribute to achieving quality urban environments?**

RPH **supports** limiting the ability for local authorities in major urban centres to regulate the number of car parks required for development. RPH does not have an opinion on which option is best, however, convenience and accessibility are two key factors in work-related travel behaviours<sup>6</sup>. The changes to parking availability should be implemented in areas where active and public transport is readily available and/or in conjunction with active and public transport improvements. This will ensure that parking changes are associated with the provision and promotion of viable, affordable travel alternatives. There is also a need to ensure the provision of accessible car parks for those who require a car to access key services (i.e. people living with disabilities) and to ensure that there are options for people from all life stages (i.e. families with young children, shift workers, people without easy access to public transport).

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Creativity, Custodianship and Collaboration. <https://www.mfe.govt.nz/sites/default/files/urban-design-zoo-protocol-colour.pdf> accessed 10 Oct 2019

<sup>6</sup> Badland, H. M., Garrett, N., & Schofield, G. M. (2010). How does car parking availability and public transport accessibility influence work-related travel behaviors? *Sustainability*, 2(2), 576-590.

Transport planning decisions have a significant impact on health and wellbeing, by influencing traffic crashes, vehicle emissions, physical activity, access to services, and mental health.<sup>7</sup> Evidence suggests that effective car parking management can have large benefits for safety, pollution reduction, physical activity and reducing congestion. Less surface parking has been associated with a stronger sense of community<sup>8</sup>, with one study finding that young people living with less traffic and car parking were more likely to have positive perceptions of the safety, friendliness, appearance and helpfulness of the people in their local area.<sup>9</sup> By adjusting the parking availability, there is an opportunity for councils to improve the health and wellbeing of their population.

### **Question 13:**

**Do you support inclusion of policies to improve how local government works with iwi, hapū and whānau to reflect their values and interests in urban planning?**

- **Do you think the proposals are an appropriate way to ensure urban development occurs in a way that takes into account iwi and hapū concerns?**

RPH **supports** this approach as urban development has more significant impacts on Māori. To achieve equity across the social, economic, and political spectrums there needs to be full Māori participation in urban planning and development. It is essential for mana whenua that their role in urban development is not only that their aspirations are considered, but that council authorities recognise their treaty obligations and ensure that mana whenua reclaim their mana, are empowered and participate in decision-making<sup>10</sup>. RPH **recommends** that the NPS provides stronger directives on how councils work with iwi, hapū and whānau with regards to reclaiming mana, empowerment and participation in decision-making.

One example of where mana whenua are being empowered to achieve their own development aspirations is Porirua City Council's draft district plan. The plan includes a chapter on papakāinga allowing for housing and associated activities on land owned by mana whenua. This approach assists whānau and hapū to provide for their unique social, cultural, environmental and economic needs within the City.

- **How do you think local authorities should be directed to engage with Māori who do not hold mana whenua over the urban environment in which they now live?**

We acknowledge that over 84% of all Māori live in urban areas, many who are mātāwaka, or non-mana whenua Māori migrants and their descendants, who no longer live in their traditional homes<sup>11</sup>.

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<sup>7</sup> Litman, T. (2013). Transportation and public health. *Annual review of public health*, 34, 217-233.

<sup>8</sup> Francis, J., Giles-Corti, B., Wood, L., & Knuiman, M. (2012). Creating sense of community: The role of public space. *Journal of environmental psychology*, 32(4), 401-409.

<sup>9</sup> Mullan, E. (2003). Do you think that your local area is a good place for young people to grow up? The effects of traffic and car parking on young people's views. *Health & place*, 9(4), 351-360.

<sup>10</sup> Ryks, J., Howden-Chapman, P., Robson, B., Stuart, K., & Waa, A. (2014). Maori participation in urban development: challenges and opportunities for indigenous people in Aotearoa New Zealand. *Lincoln Planning Review*, 6(1-2), 4-17.

<sup>11</sup> Ryks, J., Howden-Chapman, P., Robson, B., Stuart, K., & Waa, A. (2014). Maori participation in urban development: challenges and opportunities for indigenous people in Aotearoa New Zealand. *Lincoln Planning Review*, 6(1-2), 4-17.

How the NPS supports the aspirations for mātāwaka and how the NPS can ensure mātāwaka have an opportunity to have their values and interests reflected in urban planning requires further consideration. It is not RPH's place to suggest how this be done, however, we **recommend** that further work be carried out to develop processes that include all urban Māori in decision-making.

**Question 16:**

**What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?**

RPH **recommend** that explicit guidance should be provided on the features of a quality urban environment and how to achieve this via meaningful engagement of the community in the decision making. This will enable people and place centred development. Without meaningful early input from the community, the vision of improved well-being will not be achieved.

As noted earlier, the Seven Cs of the New Zealand Urban Development Protocol (context, character, choice, connection, creativity, custodianship and collaboration) need to be incorporated into planning decisions and balanced against each other. We have also referred to other non-statutory tools that can lead to quality urban environments, including a Health in All Policies approach and frameworks such as The Integrated Planning Guide<sup>12</sup> and the New South Wales Healthy Development Checklist<sup>13</sup>.

**Question 17:**

**Do you think there are potential areas of tension or confusion between any of these proposals and other national direction? If so, please identify these areas and include any suggestions you have for addressing these issues.**

There are competing pressures on council authorities with urban development often taking precedence over other land uses near urban centres. Essential for urban centres is the provision of locally-grown food to ensure affordable, fresh and healthy food for the growing population. The protection of highly productive land close to urban centres needs to be prioritised. Ensuring that the NPS on Urban Development and the NPS on Highly Productive Land work together and are understood by planners, will be crucial for protecting food security and wellbeing of the urban populations.

There is also a potential for competing priorities between increasing urban development and protection of highly productive land and achieving improved water quality. To achieve the aim of all three proposed national policy statements requires integration with current work by the Department of Internal Affairs looking at financing of the three waters infrastructure. All of these competing requirements increase the need for a spatial planning approach to mitigate potential unintended consequences of one aim over the other aims, and to ensure the best coordinated approach in planning.

Intergenerational equity is important, as planning now is not just for the current generation but also for the future generations. It is important for the NPS-UD to support councils with this area of

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<sup>12</sup> <https://www.cph.co.nz/wp-content/uploads/IntegratedPlanningGuideV3.pdf>

<sup>13</sup> <https://www.health.nsw.gov.au/urbanhealth/Publications/healthy-urban-dev-check.pdf>



tension and we note that the discussion document has considered this within requirements such as the Future Development Strategy.