

12 October 2020

Wellington City Council
PO Box 2199
Wellington 6140

Re: Draft Spatial Plan for Wellington City

Tēnā koe,

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

Regional Public Health (RPH) is the public health unit for the greater Wellington region (Wairarapa, Hutt Valley and Capital & Coast District Health Boards). Our purpose is to improve and protect the health of the population in the greater Wellington region with a focus on achieving equity. 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.

The reason for this submission is to ensure that public health and equity are included in the planning for Wellington City's future. The Ministry of Health requires us to reduce potential health risks and promote good health by various means, which includes making submissions on matters of importance to the communities we serve.

We are happy to provide further advice or clarification on any of the points raised in our written submission. We request to be heard in support of our written submission. The contact point for this submission is:

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Ngā mihi

Dr Stephen Palmer
Medical Officer of Health

Peter Gush
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OVERVIEW

Regional Public Health (RPH) **congratulates Wellington City Council (WCC) on successfully launching the draft Spatial Plan.** Spatial plans allow for integrated planning with high quality housing, public and active transport options, community amenities, and high quality communal and accessible open/green space, all of which contribute to building healthy communities and neighbourhoods.

Spatial planning is of particular importance in the light of the public health challenges we have recently faced, and that will continue to be part of the future for Wellington and other cities. The COVID-19 pandemic has positioned cities at the forefront of both the response and the recovery. Urban centres have seen the exodus of people from commercial facilities, as businesses close during lockdowns and more people work from home, and have also faced the challenge of optimally managing the movement and congregation of people when using public transport and navigating public spaces in ways that minimise disease transmission. COVID-19 has raised questions of how we foster community cohesion and resilience, when traditional places and spaces where the community gathers may be unavailable for sustained periods of time or need to be used for other purposes. Access to health and public health resources, safe and secure accommodation that fosters wellbeing and protection for the cities vulnerable persons are all made more challenging by the economic consequences of the pandemic in urban centres.

These health and social concerns intersect with what our cities look like. Key questions include how does the cities' built form and open spaces support healthy and resilient communities? And how are our natural resources and biodiversity protected? The WHO defines the Social Determinants of Health¹ as "the conditions in which people are born, grow, live, work and age". This holistic definition recognises that the environment of cities directly influences health and wellbeing because urban settings are where, for the majority of the population, we spend most of our time.

As stated in the spatial plan, it is estimated that 50 to 80 thousand more people will be living in Wellington over the next 30 years. It is essential, both for our community at present, and for our community in the future that we think about how we can grow our city in a way that promotes health and wellbeing for residents. Health and wellbeing should be considered alongside the existing priorities identified in the spatial plan: compact, resilient, vibrant and prosperous, inclusive and connected, and greener.

KEY THEMES WE SUPPORT

A number of themes identified in the Spatial Plan align with Regional Public Health focus on improving health outcomes by addressing the Social Determinants of Health. RPH commends WCC on their focus on:

¹ Available at:

https://www.who.int/social_determinants/sdh_definition/en/#:~:text=The%20social%20determinants%20of%20health,global%2C%20national%20and%20local%20levels.

Housing affordability and supply:

- It is important that we ensure there is an adequate supply of healthy, safe and affordable homes available to house the future population of Wellington. Opportunities to build new houses are generally supported by RPH, provided that any new housing stock is health promoting (well-insulated, mould free, warm, and dry etc.) and that access to housing is equitable across all members of society.
- Historically, priority populations such as Māori and Pacific peoples, have not been included in the growth of home ownership in the community. Housing must be affordable for all but especially for Māori and Pacific whānau. Housing should be appropriate for community needs, for example comprise a mix of housing types that is accessible for people living with disability and for different whānau configurations. It is essential that there is a sufficient quantity of affordable housing to meet demand at different price levels. Strategies such as inclusionary zoning may be of assistance in enhancing affordability in new developments.

Medium to high density housing near transport routes and suburban centres:

- Siting housing near transport routes and suburban centres encourages the use of public transport, and especially active transport (walking, jogging, cycling) to navigate the city and daily activities. This confers advantages on multiple levels. Reducing dependency on cars and motorised transport reduces congestion and removes impedances to public transport flow around the city. It is good for the environment as it reduces carbon emissions and it is good for health as it encourages the individual to be physically active in their community. Non-communicable diseases, such as heart disease and cancers, drive most of the ill-health and premature loss of life experienced by New Zealanders.² Promoting physical activity is one way we can reduce the impact of these diseases.

Protecting indigenous biodiversity in natural and open spaces:

- The Draft National Policy Statement on Indigenous Biodiversity recognises that the peoples of Aotearoa are both part of and dependent on the natural environment for our survival. Promoting indigenous biodiversity through preservation of habitats and protection of animal, aquatic, bird and insect life, is crucial for the wellbeing of us all. The policy statement also identifies that whilst some of the most important ecosystems and habitats are located within Aotearoa's large area of public conservation land, other important indigenous biodiversity is on privately owned and Māori land. Identifying these areas in the spatial plan and recognising the priority of protecting these ecosystems is important for the health and wellbeing of our community.³

² Ministry of Health. 2020. Health and Independence Report 2018. Wellington: Ministry of Health. Available at: <https://www.health.govt.nz/publication/health-and-independence-report-2018>

³ Ministry for the Environment. 2019. Draft National Policy Statement for Indigenous Biodiversity. Available at: <https://www.mfe.govt.nz/sites/default/files/media/Biodiversity/draft-npsib.pdf>

Providing access to open and green space in the city:

- Review of evidence has shown that living in proximity to green spaces in an urban environment is generally associated with “increased physical activity, positive health behaviours and improved health outcomes”⁴ This effect is present across the life course and appears to be particularly important in early life. Specific features of green space design such as condition, coverage/shade, and openness/visibility can be associated with green space usage. For parks this can include specific features such as safety, maintenance, sports facilities and other facilities such as walkways and paths. In adulthood, access to green space and engaging with nature is associated with behaviours, such as walking and with reduced risk of stress and psychological distress. In later life facilities such as seating, toilets and drinking water facilitate ongoing engagement with a green space and its associated health benefits.³This suggests that overall “greenness” of urban landscapes and distribution of accessible parks and green space facilities can improve health and well-being of children and adolescents, and contribute to maintaining this across a lifetime.

Resilience/preparedness:

- Climate change, natural disasters, pandemics and other hazards can significantly impact communities, both in terms of infrastructure and building damage, loss of access to essential services such as power and water, and threats to health and wellbeing, both from the acute effects of the hazard, and from the stress and trauma of the recovery. It is important that our communities are well prepared to meet these threats, through well designed buildings and infrastructure that is resistant to damage, and through places and spaces that support communities to develop networks of collaboration and support both during and outside of an emergency.

EQUITY

We tautoko the support to enable papakainga housing in the city. This activity, alongside working more closely with Iwi in the region, may help the council to further identify opportunities to improve equity in access to housing for Māori whānau in the city. It is important that we also look to support affordable housing across the city that will facilitate more Māori, pacific and low income families into housing. It is important that these areas of housing also include access to the same community amenities - public transport, green space and parks, community facilities - as other neighbourhoods in the region.

RPH also supports the identification of universal accessibility standards as a priority area of activity under the action plan. Currently many people living with a disability in the Wellington region face challenges in finding suitable housing and accessing community facilities and locations. It is essential that we address this in the new building and planning that is undertaken as a result of the spatial plan.

⁴ Douglas O, Lennon M, Scott M. Green space benefits for health and well-being: A life-course approach for urban planning, design and management. *Cities*. 2017 Jun 1;66:53-62.

REGIONAL GROWTH FRAMEWORK

Work is being done to develop a regional spatial plan called the 'Regional Growth Framework'. This work is being led by Greater Wellington Regional Council but involves all councils in the region along with a wide range of stakeholders including RPH. This is crucial work as population growth for Wellington City reflects the growth in the wider Wellington Region. Housing, transport and job opportunities in Wellington City are interconnected with housing, transport and job opportunities in the wider Wellington region. We recommend that explicit connections between these two pieces of work are drawn to ensure that there is alignment of key objectives and activities under each plan.

INTEGRATING HEALTH INTO SPATIAL PLANNING

There is a huge opportunity for the health contributing potential of cities to be better recognised in the spatial plan. Many of the themes that emerge from the spatial plan, about improving public transport, increasing walkability and bike use, developing greener and carbon neutral cities, and providing healthy and affordable homes, are all related to positive health outcomes for whānau in the community. In its present form, the Wellington City Council Spatial Plan is silent on how proposals on spatial planning relate to health outcomes and how these changes could improve measures of health and wellbeing for communities. **RPH recommends that health is integrated into any spatial plan to ensure that health and well-being is prioritised.**

RPH would like to reiterate its offer of support to ensure that health is incorporated into WCC's final spatial plan.

There are a range of practical tools that can be used during the planning process to ensure wellbeing is a core part of the final outcomes. These tools are all flexible, and can be used in their entirety or used as the basis for discussion and appraisal of spatial planning work. Tools and approaches include:

- **Health Equity Assessment Tool⁵**: a tool that aims to improve equity in health in New Zealand. It consists of a set of ten questions that assess the current and future impact of policies on health equity.
- **Health Impact Assessment or Whānau Ora Health Impact Assessment**: systematic way of assessing the positive and negative health impacts of a policy, with particular attention to inequities.
- **Health Promotion and Sustainability through Environmental Design⁶**: a planning guide developed by Christchurch City Council and Community and Public Health (Christchurch's Public Health Unit). Divided into 14 themes that identify the links between environmental design and community health and wellbeing.

⁵ Available at: <https://www.health.govt.nz/system/files/documents/publications/health-equity-assessment-tool-guide.pdf>

⁶ Available at: <https://www.ccc.govt.nz/assets/Documents/The-Rebuild/Strategic-Plans/hpstedqualitativeview110519.pdf>

- **Integrated Planning Guide**⁷: also developed in Christchurch, originally focused on earthquake recovery, but updated in 2018 to focus on city planning more broadly. Presents targeted questions to encourage critical thinking and innovation. Presents a way of ensuring sustainability, resilience and health are integrated into planning, alongside social, environmental and economic outcomes.
- **Identify opportunities to have dedicated public health expertise as part of the council workforce**: given the significant impact of spatial planning on wellbeing and health, WCC could consider funding dedicated public health expertise to work alongside planners for the duration of the project.

For further information on these tools please do not hesitate to contact us. We welcome the opportunity to remain involved as the Spatial Plan evolves, and to meet with planners to discuss how we can best support them in this work.

⁷ Available at: <https://www.cph.co.nz/wp-content/uploads/IntegratedPlanningGuideV3.pdf>