Submission on Proposed National Policy on Urban Development

To: Ministry for the Environment

Submitter: Canterbury District Health Board

Attn: Community and Public Health
C/- Canterbury District Health Board
PO Box 1475
Christchurch 8140
SUBMISSION ON PROPOSED NPS ON URBAN DEVELOPMENT

Details of submitter

1. Canterbury District Health Board (CDHB).

2. The submitter is responsible for promoting the reduction of adverse environmental effects on the health of people and communities and to improve, promote and protect their health pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956. These statutory obligations are the responsibility of the Ministry of Health and, in the Canterbury District, are carried out under contract by Community and Public Health under Crown funding agreements on behalf of the Canterbury District Health Board.

3. The Ministry of Health requires the submitter to reduce potential health risks by such means as submissions to ensure the public health significance of potential adverse effects are adequately considered during policy development.

Details of submission

4. The CDHB welcomes the opportunity to comment on the Proposed National Policy Statement on Urban Development (NPS-UD) and is pleased to see that the intention of the NPS-UD is to ensure that urban planning enables people and communities to provide for their social, economic, and cultural wellbeing through development that supports quality urban environments.

5. The future health of our populations is not just reliant on hospitals, but on a responsive environment where all sectors work collaboratively. While health care services are an important determinant of health, health is also influenced by a wide range of factors beyond the health sector. Health creation and wellbeing is influenced by a wide range of factors beyond the health sector. These environmental, social and behavioural factors are often referred to as the social determinants of health.\(^1\)

6. The most effective way to maximise people’s wellbeing is to take these factors into account as early as possible during decision making and strategy development.

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Initiatives to improve health outcomes and overall quality of life must involve central and local government if they are to have a reasonable impact\(^2\).

**General comments**

7. The CDHB broadly supports NPS-UD but has a number of recommendations for consideration which would further improve health outcomes for the community.

8. The CDHB recommends that the NPS-UD is explicit that greater wellbeing of current and future generations is the overarching goal of the document. While the consultation document recognises how urban planning decisions affect the health and wellbeing of communities, this goal is not referred to in the proposed objectives or policy. While integrated land use and infrastructure and quality urban environments are desirable, achieving these are means to improve wellbeing. The NPS-UD should be clear that is the vision it is trying to achieve.

9. A whole of government of approach is needed to achieve greater wellbeing. The shift to a focus on wellbeing should not only underpin economic policy. All work under the Urban Development Agenda and across government should be clear that greater wellbeing is the ultimate aim of government policy and all areas of policy (economic, social, environmental, etc.) can and should contribute to this goal.

10. The CDHB notes that the consultation document discusses issues for housing affordability and the impact of these things on people’s health and wellbeing. However, the policies contained in the NPS-UD do not explicitly address these issues or enable the provision of affordable housing. The CDHB is concerned that enabling higher density and increasing the supply of land will not directly result in more affordable housing. *Our Space 2018-2048: Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga* (Our Space), the document prepared by the Greater Christchurch Partnership to fulfil its obligations for a Future Development Strategy under the National Policy Statement on Urban Development Capacity (NPS-UDC), also acknowledges the need for a decent affordable home for everyone. A key focus for Our Space is on housing and gives effect to the desired urban form set out in the Greater Christchurch Urban Development Strategy and other local planning documents, which include higher densities in the central city and around commercial centres. While Our Space recognises the need for smaller

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and multi-unit dwellings, there is not enough current demand for higher density living and the market still favours development in greenfield areas. Our Space affordability targets of housing under $350,000 are already unrealistic in the current market, with townhouses and apartments already averaging over $470,000. The CDHB recommends that the NPS-UD includes mechanisms that will enable more affordable housing to be built through lowering consent and building costs.

11. Some constraints on housing capacity in Christchurch are dependent on necessary infrastructure. Investment in infrastructure and modern transport systems are essential to achieving the vision of the Greater Christchurch Urban Development Strategy and the well-functioning cities described in the NPS-UD consultation document. The CDHB supports the other work of the Urban Growth Agenda to review how local infrastructure can be enabled, as adequate funding for infrastructure is vital to achieving enhanced wellbeing for the people in our communities.

12. The CDHB supports the concerns expressed in the submission on the NPS-UD by the Greater Christchurch Partnership regarding the ‘one-size-fits-all’ approach for major urban centres (MUCs) in relation to the detailed proposed policies such as intensification. Each of the six MUCs has different attributes and varying priorities, such as the need to foster recovery and regeneration in Christchurch. The urban areas in Greater Christchurch vary enormously, from central Christchurch City and suburban neighbourhoods to the larger surrounding towns of Rolleston and Rangiora and semi-rural areas. Imposing common housing densities for such dissimilar urban areas is inappropriate. The CDHB supports the Greater Christchurch Partnership’s preference for Government working collaboratively with councils through emerging urban growth partnerships in these areas so that policies to implement NPS objectives are appropriate to each local circumstance.

Specific comments

Future development strategy

13. The CDHB supports only requiring major urban centres to undertake a Future Development Strategy (FDS). LGNZ research found that preparing a FDS required considerable time, administration and investment. The high cost of the preparing a

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4 Simonsen, T. (2019). An analysis of issues identified by councils giving effect to the National Policy Statement on Urban Development
robust Housing and Business Development Capacity Assessment is also noted in the submission of the Greater Christchurch Partnership on this consultation. The CDHB notes, however, that there are towns not classed as major urban centres that are facing housing pressures. It would be useful for local authorities in high growth areas that are not listed as major urban centres to also have tools that provide for more intensified housing, greater housing typologies and the protection of productive land.

14. The CDHB notes that under the draft objectives and policies under future development strategy there is no direct reference to either climate change, sea level rise or the protection of highly productive land. Urban climate change-related risks are increasing (including rising sea levels and storm surges, heat stress, extreme precipitation, inland and coastal flooding, landslides, drought, increased aridity, water scarcity, and air pollution) with widespread negative impacts on people (and their health, livelihoods, and assets) and on local and national economies and ecosystems. Resilience and sustainable development can be enabled by both incremental and transformative urban climate adaptation.

15. The CDHB recommends that P1C include that every FDS must be informed by  

* analysis of natural and other hazards, including climate change and sea level rise.*

Understanding these and the constraints they place on available land is essential for identifying areas suitable for future development and intensification. Urban climate adaptation can build resilience and enable sustainable development. Urban adaptation action that delivers mitigation co-benefits is a powerful, resource-efficient means to address climate change and to realise sustainable development goals. Planning for development in a coordinated, multi-level way that supports climate change adaptation can enable synergies with infrastructure investment and maintenance, land use management, livelihood creation, and ecosystem services protection.

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6 Ibid.
16. The CDHB recommends that P1D includes an additional bullet point that every FDS must identify *i) areas where there will be sea level rise.* Given the proximity of most urban centres to the coast, it is important that strategic documents provide direction on strategies to reduce the impacts of sea level rise. While it is expected that Councils will be aware of the effects of coastal erosion and inundation in their areas, it is important that this information is clearly articulated to the public through any relevant future development strategy.

17. The CDHB recommends that P1D includes an additional bullet point in P1D that every FDS must identify *j) areas where there is highly productive land.* Although highly productive land is being addressed under a separate National Policy Statement, the wording should also be included here for clarity. The importance of protecting highly productive land for food production should also be articulated in a future development strategy. Enabling local food production and markets means that communities have easy access to fresh food which is important for nutrition and overall health. As populations increase, there will be further demand for food which can increase prices, reducing in the population’s access to affordable food. It is therefore important that highly protective land is protected from urban encroachment.

**Describing quality urban environments (O2, O3)**

18. The CDHB supports the intention of objectives O2 and O3 to enable quality urban environments. As noted in point 8 above, the purpose of all government policy should be to enhance the wellbeing of all people. The NPS-UD is a chance to enable planners, designers, and policy-makers to create healthy communities.

19. The descriptors of a quality urban environment in O2 are too narrow. The CDHB notes that the intention is to include ‘a comprehensive description of a quality urban environment in the preamble to the NPS-UD’ and this could include ‘reducing the impact on the natural environment, using ecologically sensitive design, enhancing safety and good health, promoting resilience, providing transport options and reflecting heritage’. The CDHB agrees that these factors contribute to a quality urban environment. For example, recent research in New Zealand shows that ecologically sensitive design such as Green Infrastructure (GI) is fundamental to
achieving wellbeing. Without it, the benefits of investment in buildings can be negated, as outdoor landscapes can optimise liveability and expression of kaitiakitanga. International studies show that the benefits of GI are greatest where social deprivation is high as it can improve social equity and health. As the preamble to the NDS-UD does not have legal weight, this leaves ‘quality urban environment’ at risk of being interpreted very narrowly or very differently to the intention, and the desired outcomes not being achieved. The CDHB recommends including the wider description of things that contribute to quality urban environments in policy or in the official definitions of the NPS-UD to give it more weight.

20. Beyond the descriptors listed above, the description of a quality urban environment should also include having regard for, or promoting, equity, cultural diversity, economic development, food security, access to recreation and good public services (sanitation, education, healthcare), accessibility for all, and social and community capital. These social determinants of health are described in the CDHB’s recent publication Integrated Planning Guide for a healthy, sustainable and resilient future, which has been endorsed by the Greater Christchurch Partnership.

21. It is well known that New Zealand’s population is ageing but there has been no mention about how the urban environment may need to be modified to make it more accessible to people of all ages and abilities in terms of street or house design, house typography or universal design. This will support people to age in place. Accessibility and universal design of both homes and the urban environment will be increasingly important as the population ages and people live in higher density environments. The current wording of O2 a) notes ‘access’ to a choice of homes, but not that the environment itself needs to be accessible. This could be interpreted as ‘responding to changing needs and conditions’ but the CDHB recommends explicit inclusion of accessibility as a feature of a quality urban environments.

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7 https://www.buildingbetter.nz/news/2019/wsud_green_infrastructure_fundamental_to_wellbeing.html?fbclid=IwAR3Jo3sYUJUXDn3m0JRO_PuFAPQ1wt88osOHBt32HeGoTr6rS9_Sbweg9Jo
22. While offering people a choice of homes that meets their demands with regard to size and location is mentioned under O2 and P2A, homes also need to be of sufficient quality (warm, dry, secure) to support health. The CDHB recommends modifying this clause to a) offering people access to a choice of quality homes that meet their demands, jobs, opportunities for social interaction, high-quality diverse services and open space.

23. In Christchurch, the demographic makeup of the city will change due to the ageing of the population. There will be proportionately more people over 50 years of age, particularly post-retirement and elderly, than now. An ageing population, together with changes in the cultural makeup of the community, will place greater demands on community, social and health services.

24. Older people have more sensory and physical limitations than younger people. New Zealand research has shown that the current housing stock struggles to function adequately for people with impairments and tends to be costly to adapt. The poor functionality and accessibility of New Zealand’s housing stock exacerbates existing health conditions and heightens the impacts of impairment. This triggers dislocation of older people from their communities, admission to an unnecessarily high level of care and support, and shifts the cost of what is primarily a housing problem onto the health and social services sectors. Universal housing suits a family’s needs over a lifetime and can easily be adapted with minimal cost to meet individual and specialist needs. Dwellings have long lifetimes and at some stage in a dwelling’s life it will be either occupied or visited by someone with mobility issues. Universal design ensures a home is sustainable and can be adapted to meet the life-time needs of the resident from the stage where they have young children in pushchairs to when they are elderly and/or have a disability. Specifically, it ‘describes the concept of designing housing features to be aesthetic and usable to the greatest extent possible by everyone, regardless of their age, ability, or status in life.

25. Incorporating the simple principles of universal design into housing designs now allows for housing to cater for people at all stages of life in the future. Life-time

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design can also lessen the impact of falls. Nearly 400,000 medically treated injuries attributed to falls occurred in home and community settings in 2012. A community trial conducted in the Taranaki region has shown that the adoption of life-stage styled modifications have resulted in an estimated 26% reduction in the rate of injuries caused by falls at home per year in those houses where modifications were made.\textsuperscript{12}

26. The CDHB recommends that the benefits of universal design be acknowledged in the preamble of the NPS-UD, that local government be directed to include universal design in any design standards, and mechanisms to incentivise universal design features with developers be investigated.

\textbf{Amenity values in urban environments}

27. The CDHB supports the idea that amenity values are diverse and change over time, however, as the NPS-UD does not commit local councils to engage meaningfully with the community (other than iwi and hapū) to understand how urban environments are viewed by them or where their values lie, objective O4 does not actually address the problems identified with the status quo. Simply recognising that amenity values vary and change over time does not commit local councils to take any action or correct the bias in current planning practice. The CDHB recommends including a further policy under O4 that: \textit{In making planning and consent decisions, decision-makers must a) engage with the local population to understand how amenity values vary among and between individuals and communities, b) take this understanding of amenity values into account.}

28. Urban amenities can be critical to the acceptance by residents of intensification and intrinsically linked to the liveability they experience in their neighbourhoods.\textsuperscript{13} Research on residents of higher-density neighbourhoods in Auckland found that, overwhelmingly, the study participants valued the services and amenities of the neighbourhood and the ease of access to public transit.\textsuperscript{14} These were among reasons for the move. The quality of the housing options available was less important than the amenity of the neighbourhood. Understanding the local

\textsuperscript{12} Keall, M.D. Nevil, P., Howden-Chapman, P. et.al(2014) \textit{Home modifications to reduce injuries from falls in the Home Injury Prevention Intervention study: a cluster-randomised controlled trial.}, Otago University Massey University and Building Research Association New Zealand


\textsuperscript{14} \url{https://www.buildingbetter.nz/news/case_studies/higher_density_housing.html}
interpretation of amenity values, not simply recognising it, it therefore vital to support any initiatives to increase density.

29. The CDHB suggests that an alternative way to address urban amenity would be to direct councils to develop a locally defined set of urban amenity indicators, established in consultation with community. Having environmental indicators for amenity values would assist local authorities and communities to direct investment and monitor and report on the state of amenity values. Establishing these could also encourage research into urban design to provide information to local authorities to assist them in promoting the sustainable management of urban environments.

Providing for intensification

30. The CDHB supports policies to enable intensification in the locations where its benefits can best be achieved, if it is supported by quality urban development. Consolidation, as opposed to sprawl, is a way to accommodate larger populations in cities in a more sustainable, economical, and healthy way. As also noted in research commissioned by the Ministry for the Environment, “urban design that promotes a higher density of buildings and public spaces (in conjunction with other conditions such as mixed use, good building design and adequate open space) can: provide cost savings in land, infrastructure and energy.”

31. Achieving a liveable quality urban environment alongside any intensification is essential to avoid the negative health impacts that can associated with higher density living, particularly in terms of mental health. Higher density can contribute to stress and social isolation, often associated with depression and anxiety disorders. Badly constructed or poorly located higher density housing can also cause problems through poor ventilation and insulation, lack of sunlight, insufficient public and private open space, and exposure to pollutants or intrusive noise. These issues can lead to respiratory health problems, as well as isolation, fear of crime, and community dislocation; preventing the development of the healthy aspects of higher-density living, including regular physical activity.

32. To achieve health benefits higher density housing requires the support of liveable, walkable communities. Higher density policies need to deliver appropriate housing

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in quality neighbourhoods - places that people consider liveable, for example, mixed-use zoning where residential areas are interspersed with shops, services, schools and green open spaces. The research on residents of higher density neighbourhoods in Auckland also found that the degree of walkability was strongly associated with liveability by residents interviewed.\textsuperscript{16} The findings show that the quality of the local environment contributes to urban residents' sense of housing satisfaction and hence perceptions of liveability. As residential density increases, the role of the urban environment is enhanced as a source of housing satisfaction, where public spaces and amenity replace suburban backyards. In the context of transit-oriented development, the close association between higher density, multi-unit housing forms and a walkable catchment to the local centre are interdependent conditions contributing to the experience of liveability. As such, the CDHB supports enabling higher density in areas with access to existing or planned amenities and services as described in P6A.

33. The CDHB favours the descriptive approach proposed for P6C Option 1 to allow local authorities more flexibility in applying policy to direct intensification to suit local conditions. The Christchurch Central City Recovery Plan, for example, aims for higher density living and business areas in the central city but responds to the community sentiment for a low-rise city.\textsuperscript{17}

\textit{Providing for further greenfield development}

34. The CDHB recommends that any policy regarding greenfield development must specifically protect and preserve highly productive land for food production. As noted in point 16, it is vital that highly productive land is not used for urban development. The NPS-UD should also be consistent with the eventual National Policy Statement on Highly Productive Land. The Regulatory Impact Statement notes that the scope of the proposals to include policies on further greenfield development has not yet been sufficiently evidenced to understand their impact on the interaction between urban development and highly productive land. It is important that these interactions are further researched and understood.

\textsuperscript{16} https://www.buildingbetter.nz/news/case_studies/higher_density_housing.html
\textsuperscript{17} https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/central-city/FinadraftCentralCityPlan.pdf
Removing minimum car parking requirements

35. The CDHB supports the removal of minimum car parking requirements and advocates for maximum car parking requirements which will have positive benefits by increasing walkability, reducing congestion and carbon emissions, and reducing housing costs.\textsuperscript{18} Easy access to car or bike parking is a major factor influencing daily commutes.\textsuperscript{19} The availability of parking reinforces car ownership and car use. Trip frequency does not change with car ownership or access to home parking, but it does affect mode share related to cars. Minimum parking requirements can cause an over-supply of parking, and negatively affect living costs, construction costs, land use, car ownership and mode share. \textsuperscript{20}

36. The CDHB recommends that Option 2: removing the ability for local authorities to set minimum parking requirements be adopted.

37. The CDHB notes that removing minimum car parking requirements will create a need to ensure that total number of mobility car parking spaces for people with disabilities in an area are maintained. Having access to transport is an important part of life. Mobility car parks are essential for participation as they help disabled persons get out, stay connected with other people, and live more independent lives. Reserving parking for holders of disabled persons’ parking permits helps people with disabilities take part in normal everyday activities and increases their ability to get in and out of their vehicles safely. A lack of appropriate parking can cause unnecessary barriers for disabled people. Options to maintain numbers of mobility parking spaces include increasing the standard ratio of 1 mobility park per 6 car parks for off-street car parking lots, and directing local authorities to prioritise remaining on-street parking for disabled parking, taxis, and service vehicles - as described in the Christchurch Central Parking Plan (2015, p. 21).\textsuperscript{21}

38. The CDHB recommends that the NPS-UD includes minimum cycling requirements. Access to bicycle parking must be easy and convenient. It should be as barrier-free as possible, weather-protected, theft-secured and provided in sufficient quantity in

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\textsuperscript{18} https://www.citylab.com/perspective/2019/09/parking-lot-urban-planning-transit-street-traffic-congestion/598504/
\textsuperscript{19} https://www.smartcitiesworld.net/news/news/france-top-for-sustainable-parking-policy-3997
or near the entrance to buildings, taking bicycle ownership as well as (projected) daily/regular use into account. Facilities to accommodate the increasing diversity of bicycles, such as tricycles, cargo bikes and bike trailers should also be provided.12

39. Existing developments without bicycle parking should be retro-fitted, either by converting car parking spaces into bicycle parking or by providing parking facilities near/adjacent to buildings. An adequate number of power sockets should be installed for recharging e-bikes.

40. Large parking facilities should focus on managing mobility by including cycle parks, bike/ride sharing, and charging points for electric cars and bikes.

41. The CDHB recommends that these restrictions should not only apply to major urban centres but should be applied nationally because many towns throughout New Zealand are seeking compact forms with mixed use and higher residential density not just the major urban centres.22,23

**Engagement on urban planning**

42. The CDHB supports inclusion of policies to improve how local government works with iwi, hapū and whānau to reflect their values and interests in urban planning. The recognition of mana whenua and the relationship between people and land is deeply important to wellbeing for Māori. The Waitangi Tribunal’s 2019 Hauora report notes that the achievement of equitable health outcomes for Māori is the responsibility of all sectors.24 Policies regarding this type of engagement are sorely lacking in the NPS-UDC. Meaningful engagement with iwi and hapū can raise awareness of value of resources and stimulate examination of land-use options.

43. The CDHB notes that although the consultation documents acknowledge that current processes for public participation in planning tend not to enable engagement with the young, non-English speakers, ethnic minorities, the less educated and renters, the proposed policies under Objective 9 only concern iwi and hapū. Given the disproportionate impact planning policies will have on the poorest and most vulnerable urban populations, which include urban Māori, finding ways to consult...
effectively with these groups is also needed. Urban development should be flexible in order to include different world views regarding urban development and design. Public participation in urban planning is crucial to improving the relationship between design and social needs and especially important in helping to understand amenity values. The CDHB recommends that the Ministry for the Environment review the best mechanisms to enable inclusive planning with all parts of the local community and includes this in the NPS-UD.

**Evidence for good decision making**

44. The CDHB supports O8 that a robust, comprehensive and frequently updated evidence base about its urban environments is needed by every local authority. It recommends, however, that robust evaluation of the implementation of the NPS-UD is needed along with the requirements to monitor the supply of and demand for development capacity and market indicators.

45. The Regulatory Impact Statement identifies that there are significant risks for local councils that fail to implement the policies as intended, and for government to fail to monitor their effect. Ongoing engagement by central government is recommended to mitigate these risks. Evaluation is a means to remain engaged. Evaluation would also help mitigate the risk that the methods recommended to calculate capacity are not accurate enough, as it would identify where changes are needed. This evaluation could be done by central government, perhaps as research under the Building Better Homes, Towns and Cities National Science Challenge as it would fit in well with their focus on built environments; Ka ora kainga rua: built environments that build communities.

**Summary**

46. The CDHB supports the intention of the NPS-UD and the recognition of the role of the urban environment in supporting health and wellbeing. To create healthy communities we need to build a culture of health, where health is integrated into decisions in all sectors of society. Liveable, accessible environments with a diverse range of good quality housing and transport choices are the ideal conditions to support physical activity and health. Investing in the health of the population will also lead to comprehensive benefits not only for individual wellbeing but for productivity, social connection and economic growth. The CDHB recommends making the goal
of the NPS-UD to support wellbeing more explicit and defining ‘quality urban environments’ more clearly to account for the social determinants of health.

Conclusion

47. Thank you for the opportunity to submit on National Policy Statement on Urban Development.

48. The CDHB does not wish to be heard in support of this submission.

Person making the submission

Date: 1/10/2019

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