



## TOI TE ORA PUBLIC HEALTH

*Bay of Plenty + Lakes Districts*

**Te Whatu Ora**  
Health New Zealand  
Hauora a Toi Bay of Plenty

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RPS Change 6  
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### **Submission to Proposed Change 6 (NPS-UD) to the Bay of Plenty Regional Policy Statement**

#### **Introduction:**

Toi Te Ora Public Health (Toi Te Ora) is the public health service for the Bay of Plenty and Lakes districts, part of the National Public Health Service. Toi Te Ora has a purpose to improve, promote and protect the health of the Lakes and Bay of Plenty population with a focus on reducing inequalities in health.

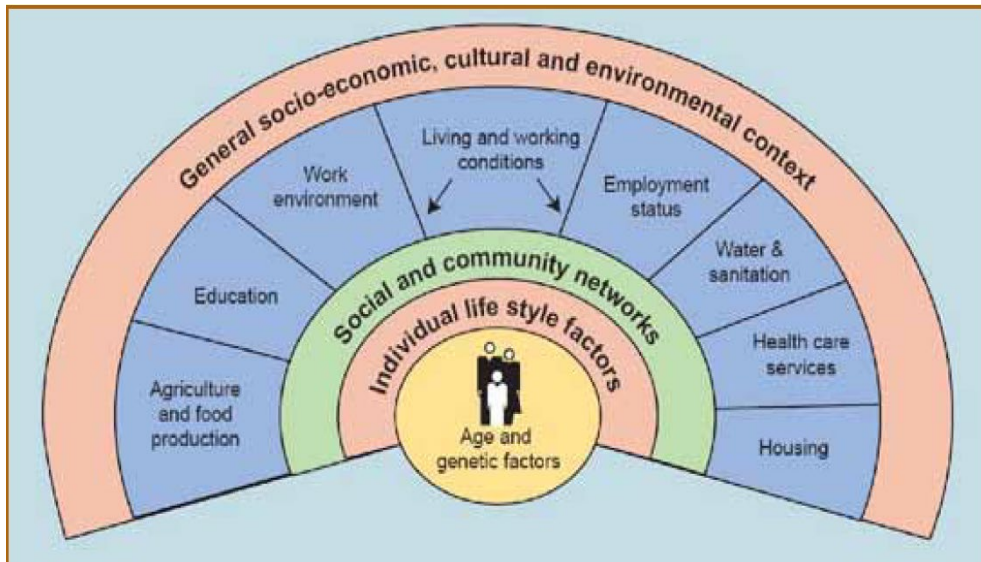
Public health is about promoting wellbeing and preventing ill health.

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 Bay of Plenty Regional Council (Council) and welcomes the opportunity to provide feedback on the proposed change 6 (NPS-Urban Development) to the Bay of Plenty Regional Policy Statement.

**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.

We note that the purpose of the plan change is to provide criteria for assessing private plan changes for unanticipated or out-of-sequence urban development and proposals for urban environments. Toi Te Ora would like to support Council by providing advice to develop the assessment criteria to prevent unanticipated or out-of-sequence urban development from harming human health for generations. Unplanned development has the potential to be detrimental to the well-being of the whole community. We would like to see the regional policy statement include a requirement for planned and unplanned urban environment proposals to demonstrate why the development should go ahead. This can be done by assessing the direct and wider community health impacts of the proposal.

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 (Ministry of Health, 2022).

For humans to thrive and be healthy the natural and built environment needs to be healthy. Biophilic cities is an international urban development and design planning concept that benefits the environment and health. 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.

We have various position statements which may assist Council is developing criteria for assessing private plan changes, enable intensification of urban environments in a healthy way. These include; [active transport](#), [built environment](#), [food security](#), [housing and health](#) and [sanitary services](#). To learn more about biophilic public health and how this plan change could take it into account go to <https://toiteora.govt.nz/public/biophilic-public-health/>

Toi Te Ora support Council with their approach to responsive planning. It is important that Council does this in a way that safeguards public health. Urban development should avoid increasing the population density in areas known to be of high risk to natural hazards, particularly areas that have multiple natural hazard risks.

Therefore, promoting development of an approach that reduces people in harm's way and manages the effects of natural hazards, including those derived from climate change, will increase community resilience, and assist council respond to climate change.

**Policy UG 3A: Promoting travel demand management across the region**

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

**Policy UG 6A: Efficient use of land and infrastructure for urban growth and development**

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

**Policy UG 7A: Providing for unanticipated or out-of-sequence urban growth urban environments**

We acknowledge Council has noted the importance of addressing zones that will be impacted by climate change and natural hazards. Taking into consideration the areas that are prone to floods and are coastal zones which will have significant impact to these communities is particularly important.

Prior to 'live 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 in addition to whether a site is significantly constrained when addressing 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.

We support this policy and particularly policy 7A(d). From a public health perspective, to support health and wellbeing, 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 policy UG 3A, in particular increases [active transport](#), reduces motor vehicle dependency, and reduces emissions.

**Policy UG 7Ax: Enable increased-density urban development – urban environments**

This policy is significant for public health and the community. Promoting dense urban development will allow walking and cycling and public transport more viable. Increasing density makes community sanitary services more affordable, increasing access and public health protection. Therefore, we support this policy and would like to assist Council in developing their future strategies.

**Policy UG 8B: Implementing high quality urban design and live-work-play principles**

We support the preservation of rural catchments of Rotorua Lakes to reduce nutrient losses from existing rural land uses. It is important to note that this also protects areas that are not yet impacted by nutrient run off.

We support this policy in its entirety. However, references to managing an aging population should be removed. Planning document, particularly documents that manage urban development and design need to cater to all ages and social needs of the people in a community- the young, elderly, people with disabilities and cultures.

**Policy UG 9B: Co-ordinating new urban development with infrastructure**

We support the intent of this policy 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.

We note that this should also include good access to reliable lifeline services, such as critical infrastructure like power, gas, and telecommunications. It is important that this policy includes waste and sanitary services, but it also needs to be planned for rather than a result of urban sprawl. The spatial plan should consider the needs of the community for other core public health sanitary services such as cemeteries, and waste management including waste minimisation.

**Policy UG 11B: Managing the effects of subdivision, use and development on infrastructure**

We support Council with this policy. This is because addressing capacity and supply issues for reticulated water and sewerage systems is essential. Individual onsite sewage systems are not suitable for growing communities.

It is crucial for the future wellbeing of our communities, that developments are planned with reticulated services. These should be professionally designed and operated from the outset.

**Policy UG 12B: Providing quality open spaces**

This is an important policy that provides individuals and communities with connectedness. It is important to ensure that this 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.

**Policy UG 13B: Promoting the integration of land use and transportation**

We support this policy and the explanation, however, the policy which requires demand management only to be considered does not go far enough to achieve the desired outcome. Toi Te Ora would like to see this policy require planning, design, and transport investment decisions. This allows for transport demand management to support compact and sustainable growth management and land use patterns.

**Policy UG 14B: Restricting urban activities outside urban environments**

Toi Te Ora supports this policy if there is additional clarification that this policy does not enable development in villages and settlements when existing reticulated water and wastewater services do not have adequate capacity.

We support this policy's aim of restricting urban activities 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.

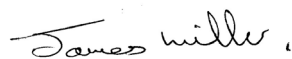
**Policy UG 20B: Managing reverse sensitivity effects on rural production activities and infrastructure in rural areas**

Toi Te Ora supports this policy because by managing inappropriately located subdivision use and development in rural areas public health will be safeguarded. The separation between incompatible land uses provides the best protection for human health.

**Policy UG 19B: Providing for rural lifestyle activities – Western Bay of Plenty sub-region**

As previously mentioned in policy UG 8B, it is also critical to protect areas that are not yet impacted by nutrient runoff.

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



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Dahlgren G, Whitehead M. 1991. *Policies and Strategies to Promote Social Equity in Health*. Stockholm: Institute of Futures Studies.  
Ministry of Health (2022). *Urban Development*. [Urban Development | Ministry of Health NZ](#)