



October 31, 2011

Auckland Council
The Auckland Plan
AUCKLAND

Draft Auckland Plan

Thank you for the opportunity to make a submission on the draft Auckland City Plan.

Our submission is attached. We would like to appear before the Council if you are holding hearings.

Yours sincerely

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President
Public Health Association

1 Introduction

1.1 Health and local government

Health begins long before sickness, in the places we live, learn, play and work. Local government is very important in shaping those places.

Places can influence health and wellbeing directly and indirectly. Attributes of places that impact directly on health either positively (such as access to recreational and green spaces) or negatively (such as exposure to hazardous traffic or waste) are often more visible than those aspects of places that effect health and wellbeing indirectly. Indirectly the places and circumstances we are in can help to make healthy choices the easy choices – or put barriers that make healthy choices hard for people.

Auckland City has many statutory responsibilities for public health:

- for community wellbeing¹
- to improve, promote and protect health²
- community safety³
- in relation to many potentially dangerous substances such as alcohol.

1.2 Who we are

The Public Health Association of New Zealand (PHA) is a voluntary association which provides a major forum for exchanging information and stimulating debate about public health in New Zealand. Membership of the PHA is open to individuals interested in public health. Our members belong to the public, private and voluntary sectors. As well as membership fees, donations and other earnings, the PHA has a contract with the Ministry of Health to encourage and facilitate informed debate on key public health issues, and to support public health workforce development. The PHA is a member of the World Federation of Public Health Associations.

Public health is defined as actions to improve, promote and protect the health of the whole population ‘*through the organised efforts of society*’⁴.

The PHA operates in accordance with the Treaty of Waitangi. We partner with Māori in our decision-making, and recognise the rights Te Tiriti affords Māori as the indigenous people of Aotearoa New Zealand. Our organisational vision is “Good health for all - health equity in Aotearoa”, or “Hauora mō te katoa – oranga mō te Ao”.

Auckland branch of the PHA

This submission is from the Auckland branch of the PHA, supported by the PHA nationally.

2 Comments overall

2.1 Strong support for many aspects of the draft plan

The PHA is very supportive of the overall intention of the draft plan for a sustainable thriving Auckland into the future. The focus on the long term future is in line with the statutory responsibility for local government to make decisions not just for the moment, but for sustainable resource use.

The PHA is also highly supportive of the first Strategic Direction – to increase equity. Inequity in health is preventable and should be prevented. In addition, the international evidence is increasingly clear that highly inequitable societies do worse economically than societies that have greater fairness.

The PHA also supports the other strategic directions, and we indicate below changes and recommendations we would like to see included that evidence suggest will contribute to better sustainability and equity outcomes for Auckland.

While still supportive of many targets and measures the PHA wants to see greater focus of many of these to better reflect the strong strategic directions. Specific details of changes we would like to see are below.

2.2 Concern about the timeframe for consultation

It has been unfortunate that the Council has chosen a short timeframe for consultation in a month when there are other significant events that make it difficult for Aucklanders to give this the attention that it deserves

The plan is big; there are multiple documents that have not always been clearly linked– eg cross cutting themes in one section tend to be not reflected in sections, even where there are cross cutting impacts. This size and complexity of the plan would not be such an issue if there was adequate time for consultation.

Consequently, even citizens who have been very involved with earlier stages – such as Auckland Unleashed – have found it hard to consider the full impacts of the plan– eg in this submission the PHA has been able to consider the plan as a whole, the strategic directions and the targets and measures – but in the time available we have not been able to fully assess priorities and actions

The new Auckland Council should not accept lack of comment on specific proposals as community agreement.

2.3 More discussion on the fundamental population assumption

The Draft Plan notes the increasing population of Auckland, and then goes on to assert that it will be desirable for Auckland to grow further, and plans to encourage substantial population growth.

The PHA questions this as a fundamental assumption of the draft Plan. An essential obligation of the Local Government Act is for Councils to take a sustainable development approach.

Increasing population in Auckland may, up to a point, be inevitable, and the City must plan for this. However, planning to not only manage the consequences of population growth but to then deliberately attract increasing number of people to the region may be very unwise.

The assertion that a significant increase in population for Auckland is desirable needs to be tested. The natural resources needed to provide for the Auckland population are limited. The most obvious example of this is fresh water. Also of concern is the potential loss of productive agricultural land for housing and associated infrastructure.

Auckland City should carefully assess the resource constraints facing the city and identify explicitly what is the population carrying capacity of the region, and what resources will be needed from beyond the region to carry any particular population. Only then can the City wisely and responsibly decide on an optimal population target for the region.

There may be a tension between increasing population and other high level objectives for Auckland City, such as creating the world's most liveable city.

Until there is greater discussion of this issue Auckland City should adopt a cautious approach to population size. It is far from clear that the population growth assumed as desirable can in fact be accommodated in terms of current and projected available infrastructure and resources without compromising quality of life, citizen participation, equity or environmental quality.

Recommendations

Develop a measure of "carrying capacity" of population based on cautious assessment of available natural resources, explicitly differentiating between natural resources that Auckland has to support people, and resources that would need to be taken from other areas to support and Auckland population;

Identify a sustainable carrying capacity by modelling a range of scenarios with varying assumptions about dwelling density, public transport availability and use and resource use per individual/ and household.

Using this carrying capacity measure, propose an upper population limit for Auckland

Discuss the carrying capacity measure and upper population limit with the people of Auckland before adopting any particular view on a desired population size for Auckland.

2.4 Measure meaningfully

The PHA endorses many of the targets and measures in the draft plan. However global measures may easily hide great variation and diversity. It is very important to

look not only at overall measurements and averages, but also to look at the range and spread of the measures. In particular, in New Zealand, there is wide variation in many outcomes and indicators by not only geography, but also by ethnicity and by deprivation. The interactions of geography, ethnicity and deprivation has long been recognised in health in New Zealand⁵ and the indices that are now available should be used by Auckland Council.

The PHA urges that all targets and measures for Auckland City specifically report data by both ethnicity and by deprivation.

Understanding variation, celebrating diversity and committing resources to achieve inclusiveness are hugely important if Auckland is to achieve Strategic Direction 1 – a strong, inclusive and equitable society.

Recommendations

All measures and targets related to populations should be reported at a minimum by ethnicity and deprivation/decile, and when practicable also by age and gender.

2.5 Recognise interconnections and co-benefits across several Directions

The draft plan has related particular directives, targets and measures, and priorities to an individual Strategic Direction.

However, many aspects of City life and function overlap. Affordable housing, employment, and good transport and education opportunities all influence Māori aspirations; likewise an effective public transport system, mixed land use developments and well-connected towns all affect sustainable resource use and increase levels of active transport. A report to the Minister of Health in 2010⁶ was clear on the effectiveness of considering multiple co-benefits.

Many of the Strategic Directions can be aligned – progress in one Direction can provide benefits in other Directions. It is important to recognise such co-benefits – there are efficiencies to be gained from synergies.

The recognition of co-benefits has two implications for the draft Plan. The most significant is that the choice of priorities should be determined by actions that contribute effectively to multiple outcomes – social, environmental, economic and cultural - that enhance the wellbeing of the population and reduce inequities between population groups. Auckland should aim to maximise co-benefits.

Highest value should be placed on priorities and actions that have high co-benefits and reduce inequities.

Two activities for the Auckland Council to invest in that have been shown to maximise co-benefits for the health, the economy, equity and sustainability are housing insulation and active transport. These should be priorities in the Plan.

Lower value should be placed on priorities and actions that contribute to only one SD and have modest ability to reduce inequities unless mitigations are included that will increase connectedness and participation.

Low value should be placed on priorities and actions that contribute to only one SD and have the risk of maintaining or increasing inequity.

The second implication is that the Plan should note where targets and measures support more than one Strategic Direction. Cross referencing is one way to do this without adding bulk to the Plan. Being clear which actions will help achieve progress on multiple Strategic Directions supports decision-making for interconnectedness.

Recommendations

Explicitly prioritise investment in activities that maximise co-benefits to health, economy, sustainability and equity – including housing insulation and active transport (see Strategic Direction 11)

2.6 Strengthen the role of health in local government planning

Auckland City has a duty (like every other local authority) to improve, promote, and protect public health⁷.

The discipline of public health emerged alongside the practice of local governance to tackle the urban problems of industrialisation. Over the past decade synergies in the practice of public health and the practice urban planning have re-emerged in response to wicked problems such as the environmental and health consequences of increasing car reliance. Congestion, air pollution and rising rates of obesity are all exacerbated by high level of car dependency. An effective public transport system in combination with medium density mixed use neighbourhoods can benefit population health while enhancing environmental quality.

There is opportunity for Auckland Council to strengthen ties to public health again as issues of wellbeing, equity and sustainability are intertwined in our city. Significant consideration has been given to these opportunities in recent years.⁸

Build on existing achievements

Public health expertise can be built into the planning process through building on successes already existing in the predecessor cities in the Auckland region. In particular the new Auckland would benefit from adopting a Healthy Cities⁹ approach and a Safe Communities approach¹⁰. These internationally renowned approaches already have a good base in Auckland.

Auckland could also learn from other internationally renowned approaches. Clearly, with the plan focus on children, it would be valuable to learn from the Child Friendly Cities movement¹¹.

With an aging population it would be prudent for Auckland to both learn from and contribute to world knowledge about being an excellent place for people to not only

grow up in, but also to grow old in. The Global Age-friendly Cities movement¹² offers inspiration for making Auckland a great place for people to continue to live across the life span.

The synergies between these approaches are high and will assist the council in meeting its strategic goals of improving the wellbeing of children and reducing inequities. Auckland could build on the approach used in Christchurch's Integrated Recovery Planning Guide – for the principles identified there apply to future planning, not simply planning for recovery.¹³).

Use well-developed tools

Whanau Ora Health Impact Assessment¹⁴ would greatly assist spatial planning. Recent urban planning trends show an unequal spatial distribution of services and amenities or have poor access to important amenities. Others have a relative overabundance of 'unhealthy services' such as gambling facilities and alcohol outlets.

Other models that have been very successful in assisting analysis and decision making for improved wellbeing are Whare Tapa Wha and Te Pae Mahutonga¹⁵.

Recommendations

Auckland City formally become a Healthy, Child and Age-friendly and Safer City and incorporate a team at the level of the mayoral office to advise across council strategies.

Auckland City develop a healthy planning document to assist council.

2.7 Have targets and measures that better reflect the strategic directions

While the PHA is generally supportive of the Strategic Directions, often the targets and measures reflect only a narrow (and possibly unrepresentative) portion of their Strategic Direction.

Targets and measures should effectively capture the intent of the Strategic Direction, lest the good intent of the Direction be undermined by focus on particular narrow targets.

3 Comments on specific aspects

In this part of our submission on each Strategic Direction we first make comment on the overall Strategic Direction, then comment on Targets and measures

Strategic Directions 1:

Create a strong, inclusive and equitable society that ensures opportunity for all Aucklanders.

The PHA is delighted to see the use of the terminology in *Fair society healthy lives* reflected in this first Direction.

Linkage and co-benefits across strategic directions

As noted above, humans, communities, towns and cities do not operate in independent strategic areas – there are overlaps and interactions. Specifically here we note that Council funding decisions in a range of Strategic Directions have the ability to either reduce social (and consequent health) inequities, or if handled badly, Council economic decisions may worsen inequities.

Strong communities

As a key purpose of local government is to promote community wellbeing¹⁶ the plan should more actively encourage general community resilience

The network of community houses supported by the predecessor cities (eg Manukau¹⁷ and North Shore) are an example of council providing the infrastructure needed to encourage connected and cohesive communities. Continuing and expanding this work should be a conscious part of the new plan.

The PHA is very pleased to see here the focus on the statutory obligation for increasing participation in ‘enduring implementation partnerships’ with Māori

As part of the purpose of local government is to enable democratic local decision-making and action by, (not just on behalf of) communities¹⁸ the plan should actively encourage community participation. Increasing participation for all citizens will have the double benefit to not only deliver on this statutory purpose of local government but will also increase participation by Māori under Article 3 of Te Tiriti.

Actions to achieve increased decision making and action by communities this could include Community Boards and other local and other regional governance groups having strong representation in decision-making that affects them.

Council should commit to ensuring other implementation partners have commitments to strong, inclusive and equitable communities (e.g DHB Community and Public Health Advisory Committees, NGOs, community networks and faith communities) are well informed and engaged.

Targets and measures:

100% of Council decisions are assessed for equity impacts and the results published.

The ECE measure should be 100% access to ECEs by 2020, in all areas, not just South and West areas

Measure voting participation rates (by ethnicity and where available, locality, gender)

There are many measures internationally of community resilience. One that could be adopted for local government use in New Zealand is WARM – the Wellbeing and Resilience Measure¹⁹

We are pleased to see health outcome data recognised as a measure of community wellbeing and equity. The data reported should be expanded to include the following

Life expectancy at birth

Routinely reported at DHB level by deprivation and ethnicity, reporting possible at regional level

Children achieving a good level of development aged 5

Reported from Before School checks

%people in households on means tested benefits

Available from census data at individual and household level

%children living in crowded houses

Available from Census data

Strategic Directions 2:

Enable Maori aspirations through recognition of the Treaty of Waitangi and customary rights

The PHA is very pleased to see the Council actively reflecting the Council obligations to Māori.

However it is not clear to us from the plan if the targets and action (eg for papakainga are what Māori want. It would have been particularly helpful here if there was greater information on the views of those with Mana Whenua to assist in making comment

Targets and Measures:

“Increase the number of Papakainga in the Auckland region by 15 by 2040” change this to “If agreed by relevant hapū, increase by a minimum of 15 Papakainga housing”,

Proposed target: That by 2013 all decisions in regards to the use of natural resources involve 100% engagement by Mana Whenua .

Strategic Direction 3:

Integrate Arts, Culture, Heritage and lifestyle into our every day lives.

The ability of citizens to adopt healthy lifestyles is influenced by many Council decisions. The plan here seems to consider organised sporting activity as the only relevant Council activity, whereas non-team-sport play on Community recreation areas also contributes to healthy physical activity, as does walking and running on (safe) streets. Council sponsored community houses have also have important roles as venues for arts and cultural groups to meet and as sites for new migrants to learn language skills and make connections with local people and New Zealand lifestyles.

Protecting all the mountains and cones (such as by early adoption of the UNESCO World Heritage status for the volcanic field) would not only protect culture and heritage but would also increase the ability of these areas to be used for safe healthy lifestyles

All waahi tapu should be fully protected, both for cultural and heritage reasons. To know where these places are, Māori community leaders must be involved to recognise their knowledge.

Targets and Measures:

Rather than just measure the fields that are ‘usable throughout the year’, incorporate a measure that shows an increased rate in physical activity. Both SPARC and the New Zealand Health Survey collect relevant data that could be used.

UNESCO World Heritage status for the volcanic field by 2015

Register of all marae and waahi tapu developed by 2013.

Strategic Directive 4:

Develop an economy that delivers opportunity and prosperity for all Aucklanders and New Zealand

The measures focuses greatly on GDP. This is a narrow view of economic wellbeing. Exclusive focus on GDP can drive actions that are in direct conflict with other Strategic Directions. For example, increasing alcohol and tobacco sales and use will increase the GDP – but is highly undesirable. Alternatively, increasing consumption of silverbeet from home and community gardens will reduce purchase of other (probably less healthy) foods and decrease GDP – but is highly desirable. The longer you sit in your car on congested roads, the more petrol you need to buy and the GDP goes up – but this is highly undesirable.

Another concern about the simplistic use of GDP as a measure of Auckland's economic wellbeing is that it does not appear to take into account equity/disparity.

Further, one of the greatest barriers to the Council meeting meaningful economic goals is ill-health and health inequities.

Greater Manchester’s strategy for economic growth²⁰ recognises ill-health as a barrier to prosperity: “The greater the levels of poverty, the greater the levels of ill-health, the greater negative impact in economic terms.” It includes as one of its strategic

objectives to “improve the economic prospects of adults in our most deprived communities by reducing the number of people with limiting illnesses and out of work due to ill health”.

Having the reduction of ill-health as an economic goal would therefore be worthwhile. The National Heart Forum of England demonstrates how local councils and public health in partnership can utilise existing planning legislation to meet local government responsibilities²¹ for ill-health prevention through three priority activities: access to healthy food, increasing active transport, creating activity-friendly places. These priority actions on the part of Auckland Council would assist it in meeting its economic goals.

Targets and Measures:

Use ‘economic wellbeing’ not just GDP, measure as green economy or GPI.

Measure inequality in economic wellbeing.

Add a target for increased employment.

Strategic Directive 5:

Acknowledge that nature and people are inseparable

In comparison with the elegance of many of the other Strategic Direction titles this is not action focused and need to be reshaped. We suggest
"Protecting Eco-Systems will also ensure future human wellbeing:"

This is perhaps one of the Strategic Directions that would most benefit from considering co-benefits and cross referencing actions, measures and targets.

Examples of inter-related actions from other strategic directions are

- carrying capacity of Auckland: e.g. water./ natural resource
- the role of Mana Whenua in decisions on resource use
- housing
- climate change
- transport

Challenges for Unitary Councils

When the current Local Government structure was established in New Zealand, one of the reasons for splitting the functions of Regional and City/District Councils was to manage the conflicting interests between the desire of City /District Councils to expand and reduce costs and the regulatory role of Regional Councils to protect and manage resources. Unitary Councils that have in one body the roles of both Regional and City/District councils, (such as Auckland is now) have a particular challenge to manage what is now an internal conflict of interest.

This challenge is apparent for several Strategic Directions such as SD 5.

While the Parliamentary Commissioner for the Environment and the Controller and Auditor-General²² has noted that it is possible for Unitary Councils to manage the internal conflict of interests, not all manage that internal conflict well.

There is little in the draft plan to indicate how the Council processes will manage the conflict, and protect ecosystems for future human wellbeing

Targets and measures:

Expand Measure 3 environmental quality to reflect the range of water quality measures already captured by other agencies (for example by Regional Public Health recreational water quality)

Clearly and transparently separate regulatory and service delivery functions

Subject environmental management performance to routine, independent audits, and make the results of such audits be made public

Ensure that priority is being given to monitoring, reviewing and reporting on the overall effectiveness of environmental management

Strategic Directive 6:

Contribute to tackling climate change and increasing energy resilience

As climate change is perhaps the biggest ecological (and therefore human -including economic) challenge facing us the wording of this Strategic Direction should be much stronger, as should the related action and measures.

We suggest the title become "Address climate change and increase energy resilience".

Auckland is well-placed to demonstrate leadership in New Zealand in addressing climate change, and needs to have adopted a significantly higher target than in the draft plan. Although the plan proposes a target higher than the current New Zealand government target for the whole country, this would be no great achievement. New Zealand's targets take into account the difficulty with reducing agricultural greenhouse gas emissions. However, Auckland's emissions are not significantly agricultural, and could therefore be reduced easily with co-benefits to health and equity.

The plan should include approaches to reduce energy use and increase use of non-carbon energy sources, not just increase energy efficiency. There are several ways to do this that have significant co-benefits in other strategic directions. For example, making better villages and towns, with better, safer footpaths and streets the benefits will be more active transport (walking and cycling) fewer child pedestrian deaths and injuries, and improved living satisfaction as well as reduced carbon consumption.

Climate change target

While we applaud that the draft Plan has a climate change target, the actual target and the government's 50% by 2050 target are very likely to be inadequate as much greater emission reductions will be required, particularly by developed cities and countries.

The 2007 Fourth Assessment Report by the IPCC (Intergovernmental Panel on Climate Change²³) stated that in order to stabilise the atmosphere [at a level where there is a **reasonable chance** of global average temperatures not exceeding 2 deg. Celsius above preindustrial levels], developed countries would need to reduce greenhouse gas emissions **25- 40% below 1990 levels by 2020, and 80-95% below 1990 levels by 2050.** [ref IPCC 2007]

Global carbon dioxide (CO₂) levels are tracking along the worst-case scenario of the IPCC with levels currently at about **390 ppm** (parts per million) and rising.

It is very important to note that **350 ppm of CO₂** is the level now considered by many leading climate scientists to be the upper level of what is safe²⁴. [refs Hansen 2008 and Rockstrom 2009] Current levels of CO₂ significantly increase the risk of irreversible climate change, such as the loss of major ice sheets, sea-level rise, ocean acidification and abrupt changes in forest and agricultural systems.

The Plan should therefore include a target in keeping with IPCC recommendations – in other words a halving of total emissions compared with 1990 levels by 2020 and moving towards an 80% reduction by 2050.

Mitigation strategies

We support mitigation initiatives as there are significant co-benefits for health, the environment and other strategic directives. For example, improved housing can reduce energy use and costs and result in warmer and healthier houses. Making better villages and towns, with better, safer footpaths and streets the benefits will be more active transport (walking and cycling), fewer child pedestrian deaths and injuries, and improved living satisfaction as well as reduced carbon consumption.

We support the Auckland Council's intention to develop "Energy and Greenhouse Gas Emissions Reduction Strategies and action plans for adoption in 2012. This will be done in partnership with key industries and partners".

Recommendation: That the health sector, public health and academic sectors are involved in the development of the "Energy and Greenhouse Gas Emissions Reduction Strategies and action plans".

We note the particular areas of focus in Box 6.2 for the Auckland Greenhouse Gas Reduction Strategy and other comments in the draft Plan for mitigation actions. We agree broadly with these areas; however, with some caveats, comments and recommendations (see table below).

Areas of focus in the draft Plan	Comments and recommendations
<p>Public transport, travel demand management, biofuels and electric vehicle technologies.</p>	<p>Note that there have been many concerns with biofuels and that the Council should proceed with caution. Full life cycle analyses should be conducted to ensure they genuinely reduce emissions and are sustainable. Adverse effects such as deforestation, impacts on food prices or displacement of people are among a number of potential concerns.</p> <p>The Greenhouse gas emissions reduction and Energy strategies needs to include active transport.</p> <p>See other comments in the submission regarding transport.</p>
<p>Renewable and distributed energy generation.</p> <p>New and emerging technologies (e.g. advanced metering and smart grid networks).</p>	<p>We note the Plan’s support of the national aspirational target of 90% renewable energy by 2050; however, the Council should adopt a real target of 90% not an aspirational target.</p> <p>We support reducing the barriers to distributed generation and supporting community level energy generation.</p> <p>The Council can act as powerful catalyst for change by only sourcing electricity for the Council from electricity providers that do not use fossil fuels for energy generation.</p>
<p>Sustainable buildings and low impact design</p> <p>Low emission precincts, neighbourhoods, communities, development zones.</p> <p>Quality compact urban form</p>	<p>We strongly support these initiatives, as buildings and the urban form are significant contributors to greenhouse gas emissions and there are significant co-benefits for health and wellbeing.</p> <p>Suggestions to consider include:</p> <ul style="list-style-type: none"> • Markedly increased energy efficiency standards • Consider the Passivehouse standard • Adoption of building energy certification • Encouraging small houses initiatives • Consent fees and rates related to building size, energy ratings and other sustainability criteria • Disincentives to the use of cars • Integration of active transport and public transport in developments/redevelopments
<p>Waste management practices.</p>	<p>We support strong sustainable waste management practices and these include full user pays for waste disposal to discourage dumping in landfills, marked increase in recycling and support for reuse, use of landfill gas, reduction in packaging, organic waste management</p>

Areas of focus in the draft Plan	Comments and recommendations
Agriculture , forestry and green infrastructure (e.g. green roofs).	We support a dramatic reduction in fossil fuel intensive and dependent agriculture; supporting urban gardening and agriculture initiatives; reforestation; agriculture carbon footprinting; and greening of the urban environment
Council leading by example as a catalyst for change	We strongly support the Council leading by example in reducing its own emissions and acting a strategic catalyst to help enable all parts of society to reduce their emissions.
Directive 6.1 “...take a coordinated approach to transitioning Auckland to a “green economy”.	<p>We strongly support transitioning the Auckland to a green economy.</p> <p>We strongly support a move away from a GDP focus to full cost accounting approaches such as the GPI (Genuine Progress Index).</p> <p>We support the use Life cycle analyses or “cradle to grave” analyses.</p> <p>Transportation is a particular area where full cost accounting is invaluable in helping to ascertain the true scope of benefits and harms.</p> <p>For example, the <i>GPI Transportation Accounts: Sustainable Transportation for Nova Scotia</i> found that the true cost of road transport in Nova Scotia was at least \$6.2 billion. Direct costs as well as indirect costs were assessed e.g. air pollution, crashes, public funds spend on roads, parking, enforcement, greenhouse gas emissions. www.gpiatlantic.org/publications/environmental.htm www.gpiatlantic.org/gpi.htm</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • Review of full cost analyses approaches • Adoption of full cost analyses by the Auckland Council as the prime focus rather than GDP • Encourage the use of Life cycle analyses

Procurement - Suggested area of focus to add when developing the Energy and Greenhouse Gas Emissions Reduction Strategies

Procurement is an area that should strongly considered for addition as the production of goods and services are a very significant source of emissions.

An example from the public sector is the English National Health Service (NHS) which found that procurement was the number one (59%) source of emissions followed by building energy (24%) and travel (17%). The NHS then went on to develop a carbon reduction strategy²⁵.

The Auckland Council employs large numbers of people and has considerable purchasing power and therefore potential influence on the supply chain to reduce emissions.

Recommendation: That the Council lead by example and adopt sustainable procurement practices and support sustainable procurement in the Auckland region.

Climate change adaptation

We support the Directive 6.3 to “Develop a climate change adaptation strategy, focused on increasing the resilience of Auckland’s natural and built environments to the impacts of climate change, and monitor for changes over time.”

However, given the potential impact of climate change on wellbeing, we suggest expanding the directive to explicitly include increasing the resilience of people and communities to the impacts of climate change.

As an illustration of the importance of monitoring the latest climate projections, recent estimates found that sea-level rise by 2100 could be as high as 1.0-2.2 metres²⁶. It is important that the Auckland Region has risk management approach that takes account of potential future changes and that planning does not lock in vulnerability should more extreme scenarios occur.

Targets and measures:

- Auckland undertakes a review of its emission reduction target.
- Auckland adopts a significantly higher 2031 target than in the draft Plan.
- Auckland adopts a 2020 and 2050 target of consistent with the IPCC range above.
- Auckland reviews its targets regularly in light of updated evidence.

Strategic Directive 7:

Keep rural Auckland productive, protected and environmentally sound

There do not appear to be specific targets. This is of concern given the apparent conflict with the intent to make available sufficient land for housing the increased population

Targets and measures:

All subdivisions need an integrated impact assessment (as part of resource consent process)

Measure: No loss of food productive land.

Strategic Directive 8:

Create a stunning city centre with well connected quality towns, villages and neighbours.

We agree with the importance of having a vibrant city centre for all Aucklanders (not just tourists) However this should not be at the expense of towns, villages and neighbourhood. Healthy towns, villages, and healthy marae need to be considered as communities in their own right and supported with sustainable social infrastructure.

Communities should be supported to find their own solutions to local problems. The draft Plan should facilitate Community Board capability to support local action to address strategic priorities creatively. In its role as facilitator Council should provide resources to support and guide local initiatives. This is the internationally recognised approach that WHO Healthy City and Safer Community programmes adopt.

Community resilience is an important, measurable way to consider the "quality" of towns, villages and neighbourhoods.

Economic development in town centres should be planned so people can shop closer to home and reduce travel costs. This means more than a local shopping centre being more than several takeaway outlets, a TAB, a videostore and a liquor outlet. Particularly pertinent in the Southern initiative region where industry targets businesses focussed on selling gambling products, alcohol and unhealthy food.

Council should

- restrict such negative business developments including regulation to prohibit gambling, liquor and fast food outlets being established in close proximity to schools.
- plan to and support sustainable businesses in towns and villages
- retaining current community infrastructures focussed on libraries, community facilities, recreation centres and town centres (e.g. Farmers' Markets, local cultural festivals and community events).

The importance of supporting cultural diversity in the city centre and different parts of the city is a co-benefit

The Southern Initiative

This great initiative is an effective way to integrate several SD.

Building a greater health focus (such as noted above in 2.6) are ways to build and strengthen existing community initiated projects (for example around healthy food and reduction of gambling outlets) that will strengthen not just the south but all of Auckland

Targets and Measures:

Reduce number and density of shops selling energy dense takeaways, alcohol, and gambling

Increase access to green spaces.

Report recreational use of space such as green space and other communal spaces.

Measure: safety of communal and green spaces (options for this include police data, ACC data for location of intentional injury)

Strategic Directive 9:

Appropriately house all New Zealanders

We are very pleased to see that housing has such a high priority in the plan by having a SD to itself. Given the importance of housing, it would be better to change the SD title to “*Affordable, safe, sustainable and healthy houses for all*”.

Regulatory action on housing standards is a core Council activity.

Housing is one of the inter-connected aspects of human life that crosses over many SDs. Actions here can have great co-benefits – good housing improves health; stable tenure reduces changes in school and so improves educational achievement; neighbourhood stability increases community interaction and resilience and makes streets and neighbourhoods safer; insulated houses are warmer and more energy efficient.

Targets and measures:

Add target: 100% of houses insulated by 2020

Strategic Directive 10:

Plan, deliver and maintain quality infrastructure to make Auckland liveable and resilient

The PHA is very pleased that the fundamental importance of local government infrastructure to the health of people is recognised here. However the crucial importance of local government for safe, well, protected communities is not captured well here, nor is it reflected well elsewhere. As custodian of Auckland City, for the people and the place, the City Council has a range of protective functions.

Given the importance of this role, it would be better to change the SD 10 title to ***“Plan, deliver and maintain quality infrastructure to make Auckland safe, well protected, liveable and resilient ”***

However, you may consider that some of these issues are better placed in other strategic directions – but the importance of a safe, well protected Auckland is essential to achieving other high level objectives.

Both the people and the place need protection – and there are a range of laws that place that protective responsibility with the Council.

The major issues for immediate safe protection of people are

- community safety, including unintentional injuries, family and community violence and road safety
- Hazardous substances and activities (in particular tobacco, alcohol and gambling)
- Damp, unsanitary and overcrowded houses
- Food safety
- Water, sewage and rubbish disposal

Strategic Directions 5 (*Acknowledge that nature and people are inseparable*) 7 (*Keep rural Auckland productive, protected and environmentally sound*) 9 (*Appropriately house all New Zealanders*) and 10 (*Plan, deliver and maintain quality infrastructure to make Auckland liveable and resilient*) go some way to capture some protective responsibilities. Others are noted (but only in passing) elsewhere.

The PHA endorses the Plans intentions in the areas of safe urban environments, housing, road/cycle safety, food safety and emergency planning.

A Strategic Direction for a safe, well protected Auckland would enable more comprehensive links with other Strategic Directions. For example, The Draft Plan has a wonderful aspiration for a child-friendly city - the draft plan's only reference to injury is traffic accident related, which does not reflect the Council's role in injury prevention - both unintentional and intentional.

It is possible to easily use existing data systems and apply local action for Government strategies. For example, Government's Taskforce for Action on Violence in Families has measures in its national monitoring and reporting of its Programme of Action www.msd.govt.nz

Auckland will not deserve Liveable City status if our rates of child abuse and neglect and preventable hospital admissions for children continue to be shamefully high

Clarify and cross link

This SD is yet another in which there is significant cross over and co-benefits between strategic directions. If the intention is for SD 10 to refer only to the aspects of infrastructure that are not covered in other SD then this should be clear, and it should be clear where these other infrastructure elements are covered in the plan.

The language of this and other sections is somewhat confusing. It is unclear if by "infrastructure" this SD refers to all of the Core Services of s11A of the Local Government Act, or only to Network infrastructure as defined in s 197 of the same Act. Either way, this SD does appear to cover the range of infrastructure under the Act.

Infrastructure such as libraries, museums, and, recreational facilities, provide vital points of social encounter and information exchange and their role in promoting social capital / resilience local communities needs to be acknowledged and sustained

It is also confusing that there are transport is covered in this SD and also in SD 11. This could be managed by better cross referencing.

Water

The focus on water needs to extend to water quality and contamination

Approaches to water conservation must ensure protection for the most vulnerable communities on water availability and ensure that any cost structure does not worsen inequalities. Water availability should be considered more broadly. For example, the high local rainfall in Auckland makes it an ideal place to incentivise citizens to collect rain water for gardens and toilet flushing. As with all financial incentive approaches, it is essential that there is adequate education on water conservation.

Transport

Comments on transport-related matters are all included in SD 11

Recommendations

Modify the SD title or add a Strategic Direction for a safe and well protected Auckland.

Enhance existing community safety targets/measures by adding measures /targets for such as hospital admissions or ACC data for assault, child injury, with an explicit subset of child pedestrian injuries by locality.

Facilitate partnerships with government and community organisations working to improve community safety

Reduce maximum annual potable water network losses to less than 12% of total network volume by 2040, to Zero outflows (Stormwater/ sewerage/ Industrial material) and earlier than 2040.

Introduce a target for improved overall water quality of drinking water

Introduce a target for sea, lake and river (recreational) water quality(Cross refer to other SD s)

Strategic Directive 11:

Create better connections and accessibility within Auckland, across New Zealand and to the world

The PHA supports the Council's direction to improve public transport in Auckland. A good public transport system should contribute to the Council's equity and economic objectives by prioritising access to education, employment, goods and services by deprivation and ethnicity. These objectives should be accounted for in the prioritisation of public transport investments. Projects need to demonstrate how they will contribute to these high level objectives.

Transport user hierarchy

We strongly recommend the adoption of a transport users hierarchy²⁷ for strategic planning and implementation of all transport and urban design projects. Such a hierarchy prioritises active transport first, then public transport, followed by business and freight, and finally the use of private vehicles for personal transport. We believe this as being essential for the development of world class transport and urban systems and if adopted, would also lead to the best outcomes for human health and environmental sustainability.



* Note: Pedestrians with mobility problems are given the highest priority

Active transport

The Marmot review (*Fair Society, Healthy Lives*), England's National Heart Forum²⁸ and international experts on climate change and health²⁹ all emphasise the role of prioritising investment in cycling and walking for transport (active transport) for achieving health, equity and sustainability goals. It is therefore with concern that we note the lack of focus, targets and prioritised investment in creating a city for safe cycling and walking for transport.

In an economic environment where the price of transport is projected to increasingly curtail access to goods and services, and central government is scrutinising the costs

and benefits of transport projects, active transport investments have clearly demonstrable benefits for low cost.

One potential risk of promoting cycling for transport in Auckland is that cycling on Auckland's road network is currently more dangerous than in many cities of the world. Without adequate attention to infrastructure reflecting international best practice, there is a risk that both mode shift and safety targets will not be met. We recommend that the Council adopt cycling infrastructure recommendations from countries and cities that have extensive experience with cycling and have successfully increased cycling's mode share without incurring an unacceptable injury toll.

Road safety - Adopt of 30 km/h as the default speed for all residential zones

Traffic danger is an important barrier to walking and cycling. Given this, reducing vehicle speeds is a promising approach to enabling safer walking and cycling. Vehicle speed is perhaps the most important factor influencing road traffic injuries, especially for walkers and cyclists. Pedestrians struck by vehicles travelling at 30 km/h have a 10% chance of being killed. At 40 km/h, the risk of death is approximately three times higher. At 50 km/h, the risk is eight times higher³⁰.

This has led to the introduction of 30 km/h (or 20 mph) zones in many cities in Europe and the United Kingdom which has resulted in significant reduction in road traffic injuries particularly for children. These zones lead to a more equitable city and reduce health inequalities^{31 32}.

Substituting car use with walking and cycling also reduces greenhouse gas emissions. Reducing motor vehicle speeds is also likely to reduce community noise levels. Finally, as illustrated by the diagram on p117 of *Auckland Unleashed*, streets with lighter traffic have stronger social connections within streets.

Access to health facilities

Under SD 10 there are targets for access to health facilities. There are two issues with these targets. They are of limited use unless you identify (i) that public transport is the key form of transport for access time to be measured, and (ii) what type of health facility eg hospital or a primary care service.

Water based transport

In addition, there is an absence of specific discussion about water-based transport. Auckland is a water city, with plenty of opportunity to increase the role of small, environmentally sound forms of water-based transport such as those being used currently in Brisbane. Such a system of small vessels would greatly enhance Auckland's public transport system in a way that reflects Māori culture and traditions of water-based transport in the region.

Targets and measures:

Cycling infrastructure guidelines for Auckland based on best practice from the international literature developed by 2012 and in use by 2013

Target for the proportion of Auckland that is accessible by safe walking and cycling (target for the infrastructure, as well as target for how many people use the infrastructure)

Include ambitious and separate targets to increase cycling and walking mode shares for all trips (we suggest 20% of all trips by cycling and 30% of all trips by walking) ie increase the non-car trip target to 50% of all trips

Signal the development of a specific plan to transform the current system of water-based transport.

Adopt 30 km/h as the default speed for all residential zones as a priority.

¹ Local Government Act 2002

² Health Act 1956

³ Building Act 2004

⁴ Acheson, D. (1998). *Independent inquiry into inequalities in health*. London: HM Stationery Office.

⁵ Reinken McLeod & Murphy *Health & Equity* Dept of Health, Wellington. 1985

⁶ Public Health Advisory Committee *Healthy Places Healthy Lives* (2010)

<http://www.phac.health.govt.nz/moh.nsf/indexcm/phac-healthy-places-healthy-lives>

⁷ s23 Health Act 1956

⁸ Public Health Advisory Committee *Healthy Places Healthy Lives* (2010)

<http://www.phac.health.govt.nz/moh.nsf/indexcm/phac-healthy-places-healthy-lives>

⁹ As has been done in the previous Manukau city

¹⁰ As had been done in the previous Waitakere city

¹¹ <http://www.childfriendlycities.org/>

¹² http://www.who.int/ageing/publications/Global_age_friendly_cities_Guide_English.pdf

¹³ Integrated Recovery Planning Guide 2011 <http://www.healthychristchurch.org.nz/focus-areas/integrated-recovery-planning-guide.aspx>

¹⁴ Ministry of Health. 2007. *Whānau Ora Health Impact Assessment*.

Wellington: Ministry of Health. [http://www.moh.govt.nz/moh.nsf/pagesmh/6022/\\$File/whanau-ora-hia-2007.pdf](http://www.moh.govt.nz/moh.nsf/pagesmh/6022/$File/whanau-ora-hia-2007.pdf)

¹⁵ <http://www.maorihealth.govt.nz/moh.nsf/0/1c22c439ddc5f5cacc2571bd00682750> Durie M. 1994.

Whaiora: Māori Health Development. Auckland: Oxford University Press, Durie, Mason (1999), 'Te Pae Mahutonga: a model for Māori health promotion', *Health Promotion Forum of New Zealand Newsletter* 49, 2-5 December 1999.

¹⁶ S10(b) Local Government Act 2002

¹⁷ Carroll, P., & Witten, K. (2010). *Community houses in Manukau: A Snapshot*. Manukau: Community Advisory Services, Manukau City Council.

¹⁸ S10(a) Local Government Act 2002

¹⁹ Mguni N, Bacon N. Taking the temperature of local communities: The Wellbeing and Resilience Measure (WARM). London: Young Foundation, 2010. <http://www.youngfoundation.org/our-work/advising-public-service-innovation/warm/wellbeing-and-resilience-measure-warm>

²⁰ ". (Prosperity for All: The Greater Manchester Strategy, August 2009)

(<http://www.healthylives.org.uk/>).

²² *Local Government Environmental Management A Study of Models and Outcomes* Parliamentary Commissioner for the Environment and Controller and Auditor-General http://www.pce.parliament.nz/assets/Uploads/Reports/pdf/local_govt.pdf

²³ Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report: Climate Change 2007. Working Group III: Mitigation of climate change. Box 13.7 http://www.ipcc.ch/publications_and_data/ar4/wg3/en/ch13-ens13-3-3-3.html

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- ²⁴ Hansen, J et al. Target atmospheric CO₂: Where should humanity aim? *Open Atmos. Sci. J* 2008;2:217-31
- Rockström, J et al. A safe operating space for humanity. *Nature* 2009;461:472-75
- ²⁵ (www.sdu.nhs.uk/publications-resources/26/NHS-Carbon-Footprint/)
- ²⁶ The Royal Society of New Zealand. Emerging issues – Sea level rise. 2010. Available from URL: www.royalsociety.org.nz/publications/policy/2010/emerging-issues-sea-level-rise/
- ²⁷ City of York Local Transport Plan 2011 – 2031 (LTP3). www.york.gov.uk/transport/ltpltp3/default/
- ²⁸ <http://www.healthyplaces.org.uk/>
- ²⁹ Woodcock J, et al 2009 Public health benefits of strategies to reduce greenhouse-gas emission: urban land transport *Lancet*
- ³⁰ Peden M, Scurfield R, Sleet D, et al. World report on road traffic injury prevention. Geneva: World Health Organization; 2004. <http://whqlibdoc.who.int/publications/2004/9241562609.pdf>
- ³¹ Grundy C et al. Effect of 20 mph traffic speed zones on road injuries in London, 1986-2006: controlled interrupted time series analysis. *BMJ*, 2009, 339:b4469. <http://www.bmj.com/content/339/bmj.b4469.full>
- Steinbach R et al. The impact of 20 mph traffic speed zones on inequalities in road casualties in London. *J Epidemiol Community Health*, 2011, 65(10):921-6. <http://jech.bmj.com/content/early/2010/11/15/jech.2010.112193.short>
- ³² <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+IM-PRESS+20110620IPR21904+0+DOC+XML+V0//EN&language=EN>