



TOI TE ORA PUBLIC HEALTH

Bay of Plenty + Lakes Districts



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Submission: He Papakāinga, He Hāpori Taurikura - A Strategy for Homes and Thriving Communities

The Lakes District Health Board (Lakes DHB) is responsible for planning, funding and providing health services to the Lakes Region and has a vision of Mauriora (Healthy Communities). Lakes DHB is required by the Public Health and Disability Act 2000 to improve, promote, and protect the health of people and communities; to promote the inclusion and participation in society and independence of people with disabilities; and to reduce health disparities by improving health outcomes for Māori and other population groups.

Health care services are important health interventions; their primary purpose is to manage disease, ill-health and trauma at an individual level. The health and wellbeing of a community is strongly influenced by a wide range of influences beyond the health sector. For these reasons, Lakes DHB is committed to working collaboratively with Rotorua Lakes Council and Te Arawa Whānui and welcomes the opportunity to comment on the Te Pou pou Rautaki – Homes and Communities Strategic framework.

Toi Te Ora¹ Public Health (Toi Te Ora) is funded by the Ministry of Health and is the public health unit for Lakes DHB. Our purpose is to improve and protect the health of the population, with a focus on reducing inequalities in health. Toi Te Ora has prepared this submission on behalf of Lakes DHB.

Many of the crucial underlying factors that contribute to population health and wellbeing are directly influenced by the decisions and activities of councils. For this reason, Toi Te Ora and Lakes DHB welcome the opportunity to:

- a. provide feedback to the Rotorua Lakes Council on its proposed housing strategy; and

¹ Toi Te Ora represents the ideal of the ultimate and enduring wellbeing. 'Toi' is the name of a celebrated ancestor in the Eastern Bay of Plenty and 'Ora' is to be alive, well and healthy.

- b. assist Rotorua Lakes Council to achieve the objectives listed in the plan that relate to public health.

The vision, purpose and goals of Toi Te Ora are closely aligned with those of Council.

Lakes DHB supports the vision and the intent of Te Pou pou Rautaki Homes and Thriving Communities Strategic Framework and acknowledges the partnership approach and consultation to bring the framework this far. Lakes DHB appreciates this opportunity to provide further written feedback.

The first part provides feedback on the objectives and the second part focusses on the proposed workplans.

Objectives

Te Arawa, local and central government are partners in the governance and delivery of this Housing Strategy

Lakes DHB supports the collaborative approach with Te Arawa for implementing the strategy, as well as the measures to ensure this happens.

Safe emergency housing options that meet differing needs are available for short-term use

It is important that any housing, and particularly housing for people in vulnerable situations, is of good quality and is warm and dry. The DHB agrees and supports the objective and the measures for this objective. We support the requirement that emergency housing meets the standard for residential-purpose housing at a minimum. Response actions to emergency situations should not increase the likelihood of poor health.

Increase the supply of transitional and social homes and locate through a range of mixed communities

Lakes DHB supports increasing the supply of transitional homes and locating the social homes through a range of mixed communities.

Lakes DHB **recommends** the council and Kāinga Ora Homes and Communities consider the evidence reviews from the UK to further develop the Rotorua mixed communities' approach.

Lakes DHB believes that the measure to support locating homes through a range of mixed communities will be insufficient to prevent neighbourhoods of social and transitional homes. A limit of 33% concentration of transitional and social homes in any one SA2 has been proposed as a measure of success for this objective. SA2 are large areas. In Rotorua district the median number of dwellings in SA2 areas (excluding SA2 areas with no dwellings) is 639 as of the 2018 census. At the median, the 33% concentration would allow for clusters of 213 dwellings. This would increase for SA2 areas with higher than the median number of dwellings. The 33% concentrations would not achieve the desired objective of mixed communities. Lakes DHB **proposes** that the 33% measure be applied to the smaller SA1 areas. This would maintain 33% within SA2 area and ensure there are no significant clusters within SA2 areas.

Increase the supply of rental and owner-occupier homes to meet population needs

Lakes DHB **supports** the objective. Lakes DHB notes that the measures of success for increasing the rate of home ownership by Te Arawa people, as well as increasing the number of homes built on Māori-owned land will be critical to the success of this objective, given that the proportion of Māori living in Rotorua district is projected to increase from 38% in 2018 to 45% in 2038 and the special status Te Arawa holds as a Treaty partner.

Support services (to move from emergency to stable housing) are readily accessible

Lakes DHB **supports** the objective and believes the measures will provide a foundation for its achievement.

Improve the quality of housing stock to a healthy standard

Lakes DHB **strongly supports** the objective to improve the quality of the housing stock to a healthy standard.

Lakes DHB commends the Council for striving to upgrade the 9,000 sub-standard homes to meet the Healthy Homes Standards. Toi Te Ora offers its support to Council to achieve this outcome.

The healthy homes standards represent a minimum standard to support the health of people living in rental properties who are not considered vulnerable. The healthy home standards require that the living room is capable of being heated to 18 degrees with an efficient heat source². The healthy home standards do not require the other areas of a dwelling, including the bedrooms, to achieve 18 degrees. Throughout the development of the Healthy Homes Standard Lakes DHB advocated for a higher indoor minimum temperature of 20 degrees and for all rooms in the home to be able to achieve 20 degrees. The World Health Organization guidelines³ suggest that a higher indoor temperature is required to support the health of vulnerable people. A higher indoor temperature of 20 degrees would support the health of vulnerable people including elderly, young children, people with chronic conditions and disabled people. Lakes DHB **recommends** that an additional measure be added stating: homeowners and landlords will be given advice to enable them to upgrade their homes so they can achieve an indoor temperature of 20 degrees throughout the home.

Homes are part of well-designed, thriving and connected communities for the future

Lakes DHB supports this objective and its recognition of how the wider context of where a home is located effects its suitability and affordability. Lakes DHB also **recommends** the inclusion of 'healthy' and 'equitable or fair' to this objective to acknowledge the evidence-based links between urban development and the health of communities, including the distribution of health⁴.

² Ministry of Housing and Urban Development. Health homes standards. Retrieved from: <https://www.hud.govt.nz/residential-housing/healthy-rental-homes/healthy-homes-standards/>

³ World Health Organization. WHO Housing and health guidelines. Geneva: World Health Organization; 2018. Retrieved from: <https://www.who.int/publications/i/item/who-housing-and-health-guidelines>

⁴ BC Centre for Disease Control. (2018). Healthy Built Environment Linkages Toolkit: making the

The list of supporting measures identified are reasonably comprehensive, and it is excellent to see social equity and child equity measures included. To further enhance these equity measures, Lakes DHB **recommends** all data collected be disaggregated by population sub-group where appropriate, to measure any differences in uptake or effects of development. Portland, in the United States of America, provides an excellent example of equity-focused community and urban planning (see appendix).

Well-designed, thriving, connected, healthy and equitable communities must also be food secure, and urban planning can assist in achieving this. Lakes DHB **recommends** the following measures to promote food security:

- Increased proportion of low-income population living in urban areas that are within a walkable distance of a full-service supermarket
- Increased number of sites in urban areas that are currently in use for growing food, or have potential for urban agriculture, particularly if the soil and other factors indicate that the sites are good for growing kai. Urban agriculture may include community gardens but is not limited to this form of urban agriculture. OMG⁵, run by For the Love of Bees, in central Auckland is a good example of urban agriculture that provides training, employment and volunteer opportunities in an urban garden, while supplying locally grown food to local people.
- Decrease distribution, density and number of fast food and alcohol outlets through provisions in a local alcohol policy, district plans and alcohol bylaws.
- Accessible environments and transport make an important contribution to a connected and affordable community. Lakes DHB recommends that in addition to the broad measure to increase “active and public transport use compared to private vehicle use”, the following also be monitored:
 - Access to jobs, education, nature and social and health services, by non-car modes (eg could use [Walkscore](#)⁶), and by population sub-groups
 - Commute mode share
 - Increased active transport to and from school

Access to nature and urban green space is well-documented as a positive contributor to improved public health outcomes for communities. In addition to promoting active recreation and social connection, green spaces provide areas where physical, mental and spiritual wellbeing can be enhanced through observation of and interaction with natural flora and fauna. Lakes DHB recommends addition of a specific measurement point for green spaces in relation to this objective:

links between design, planning and health, Version 2.0. Vancouver, B.C. Provincial Health Service Authority. Retrieved from http://www.bccdc.ca/pop-public-health/Documents/HBE_linkages_toolkit_2018.pdf

⁵ For The Love Of Bees. Retrieved from <https://www.fortheloveofbees.co.nz/omg>

⁶ Walkscore (2020). Retrieved from <https://www.walkscore.com/methodology.shtml>

- Improved indicators of quality and equity in access to green spaces, parks and representations of natural environments.

Increase local economic development, employment and training

The development of more social housing should be used as an opportunity to upskill existing professionals and tradespeople in the building of highly efficient homes that can achieve Homestar or Passive House Certifications. Rotorua could position itself to become a centre of excellence for building affordable but highly efficient homes that can achieve Passive or Homestar certification. Lakes DHB proposes a measure to support this:

- Training pathways are developed to support the building of high-rating HomeStar homes or Passive House certified homes.

Reduce cumulative negative impacts of emergency housing on the inner city and improve perceptions of safety

Lakes DHB notes that there is concern about the behaviours of some of the night shelter users and their associates. The actions taken during COVID-19 demonstrated that with the right support some of the night shelter users could be transitioned into more appropriate accommodation.

Lakes DHB does not consider that excluding emergency accommodation from the CBD will prevent anti-social behaviour. Lakes DHB **recommends** removing the measure “No Night Shelter or emergency housing in the CBD”. We recommend replacing it with an alternative measure; “When a night shelter is required it will provide support services to transition users into more appropriate housing based on for example, the Auckland City Mission model⁷”. We recommend that the objective “Reduce cumulative negative impacts of emergency housing on the inner city and improve perceptions of safety” be reworded so that emergency housing is not seen as having negative impacts on the surrounding area.

Work Streams

Develop a community safety plan

Lakes DHB notes the absence of reference to the Local Alcohol Policy (LAP)⁸ in relation to the development of a community safety plan. Alcohol is a significant cause of harm in the community and street drinking currently takes place within the CBD and nearby parks. The community safety plan may not be able to achieve its objectives if consideration is not given to the LAP.

The Rotorua Lakes Council LAP was in provisional form from 2015 and was adopted on 18 February 2019. The council must review the LAP at least every six years. Liquor ban areas are separate from the LAP and new areas could be created before the policy is reviewed to support the community safety plan.

⁷ <https://www.aucklandcitymission.org.nz/what-we-do/homeless-services/>

⁸ <https://www.rotorualakescouncil.nz/our-services/permitsfoodliquorlicensing/Liquor/Pages/Local-Alcohol-Policy.aspx>

The Council has a statutory obligation to consult the Medical Officer of Health when reviewing the LAP. Lakes DHB **recommends** that the community safety plan be developed in conjunction with the review of the LAP.

As noted in the objective section Lakes DHB recommends removing the 'No night shelter or other emergency housing in the CBD' measure.

Emergency Transition Accommodation

No comment.

Temporary Transitional Housing

No comment.

Social Housing

The Council should encourage Kāinga Ora Homes and Communities to build high quality homes that will perform for the occupants, help achieve air quality targets and support climate change CO₂ reduction. Kāinga Ora Homes and Communities has committed to building HomeStar 6 homes (6 is the lowest HomeStar rating although it is a higher standard than building to code).

The Council should encourage Kāinga Ora to build new social housing units to the highest possible standard to future proof a critical infrastructure that is going to be part of Rotorua for the next 50 years or more. Lakes DHB **suggests** two measures:

1. Rotorua Lakes Council works with Kāinga Ora to develop demonstration social home/s that achieve Homestar 10 rating or Passive Home certification.
2. Undertake a feasibility study for building social homes to a HomeStar 6 standard or higher.

Exeter City Council in the UK have been building passive⁹ social housing homes for the last eight years¹⁰. In terms of cost, in the UK once volume was achieved it is estimated passive house premium decrease from an additional 8% build costs to 4%¹¹. Passive home construction is still in its infancy in New Zealand with fewer than 30¹² passive homes in New

⁹ "The Passive House standard is a rigorous, systems-based approach to closing the gap between the anticipated and actual performance of buildings. The first certified Passive House home in New Zealand was completed in Auckland in 2012. Over 20 have followed since.

The idea is to construct buildings that are healthy and comfortable year-round, while needing very little energy to operate. This is achieved through a quality assurance regime that starts with the design and ends with the as-built certification". retrieved from: <http://www.level.org.nz/passive-design/passive-house/>

¹⁰Exeter City Council, Low Energy Development Information Pack, retrieved from: <https://www.houseplanninghelp.com/wp-content/uploads/2016/09/Exeter-City-Council-Scheme-Information.pdf>

¹¹ Passivhaus Trust, Research Report - Passivhaus Costs & Benefits, https://www.passivhaustrust.org.uk/guidance_detail.php?gId=41

¹² BRANZ, Passive Design, retrieved from: <http://www.level.org.nz/passive-design/passive-house/>

Zealand. Rotorua, with an ambitious target for its social housing, could be a centre of excellence and knowledge for the building of passive homes or highly rated HomeStar homes in New Zealand, that are affordable and not necessarily architectural show homes. Having these sorts of measures for social housing would link the social housing work plan to job creation and the Employment Pathways workplan.

Rural and Urban Papakāinga

All homes including Papakāinga homes need to meet and whenever possible exceed the Healthy Homes Standards. The proposed measures focus on volume of homes but not the quality of the new homes being built. A further success measure for new homes achieving passive status or a high HomeStar rating is suggested by Lakes DHB. Having a quality measure would ensure the homes perform as expected and are healthy for their occupants. It would also make them more economically and environmentally sustainable in the long term. As outlined in the social housing section, developing capacity to build high rating HomeStar homes or passive homes would contribute to job creation, industry expansion and the Employment Pathways workplan.

Lakes DHB note that the measure of 50 new Papakāinga in the next three years is a significant increase on current Papakāinga builds. In the last three years no Papakāinga homes have been constructed and there is significant lead in time between whanau expressing a desire to develop Papakāinga homes and homes being constructed. Lakes DHB supports this measure but suggests the timeframe may need to be reassessed.

Thriving Communities

The adoption of integrated planning/urban design guidelines will be valuable for Rotorua. Lakes DHB supports this workstream and is willing to provide public health advice via Toi Te Ora, early in the process.

Locality Plans

Lakes DHB supports and notes this workstream and wishes to highlight Toi Te Ora's interest to provide public health advice to Council early in the process.

Healthy Homes

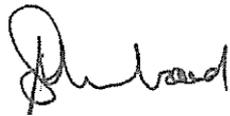
Lakes DHB supports the Healthy Homes work plan. Lakes DHB already works with Sustainability Options and Rotorua Energy Charitable Trust on the 20 Degree Healthy Homes project through Toi Te Ora. The 20 Degree Healthy Homes project will contribute to the 350 homes per year being supported to develop improvement plans and receive grants to undertake critical home repairs.

Enabling Infrastructure

Lakes DHB notes this workstream and is interested in any opportunities to provide a public health advice lens early in the process through Toi Te Ora, resources permitting at the time.

Job Creation and Employment Pathways
Lakes DHB supports this workstream.

Lakes DHB and Toi Te Ora thanks Rotorua Lakes Council for the opportunity to provide feedback on its proposed housing strategy.



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APPENDIX: Portland, USA: An example of equity focused community and urban planning.

[Portland](#) is an example of a city that has put advancing equity at the centre of its community planning. Portland defines equity as “when everyone has access to the opportunities necessary to satisfy their essential needs, advance their well-being and achieve their full potential. We have a shared fate as individuals within a community and as communities within society. All communities need the ability to shape their own present and future. Equity is both the means to healthy communities and an end that benefits us all”.

Portland states that “the promise of opportunity is real when:

- All Portlanders have access to high-quality education, living wage jobs, safe neighbourhoods, basic services, a healthy natural environment, efficient public transit, parks and green spaces, safe and sound housing and healthy food.
- The benefits of growth and change are equitably shared across our communities.
- No one community is overly burdened by the region’s growth.
- All Portlanders and communities fully participate in and influence public decision-making.
- Portland is a place where your future is not limited by your race, gender, sexual orientation, disability, age, income, where you were born or where you live.
- Underrepresented communities are engaged partners in policy decisions”.

Portland states that “to close the gaps, we will:

- a. Collect the data we need to understand the conditions and challenges facing communities with disparities. We will use alternative data sources and research methods where needed.
- b. Track and report spending and public service measures by place and community.
- c. Raise awareness, increase understanding and build capacity to identify critical disparities in an inclusive manner.
- d. Assess equity impacts of policies, programs, public services, investments and infrastructure delivery that may appear fair, but marginalize some and perpetuate disparities.
- e. Develop strategies to mitigate equity impacts, including reallocating public resources to address critical disparities.
- f. Build a public database of what works. Prioritize policies, programs and actions to make measurable progress towards more equitable outcomes.
- g. Tailor approaches to disparity reduction so they are relevant to the primary needs of each at-risk community”.

Excerpt from the [2035 Portland Comprehensive Plan](#)

Vision: Portland is a prosperous, healthy, equitable and resilient city where everyone has access to opportunity and is engaged in shaping decision that affect their lives.

Guiding Principles: Not just where but HOW Portland will grow.

The Comprehensive Plan includes five Guiding Principles to recognize that implementation of this Plan must be balanced, integrated and multi-disciplinary. The influence of the Guiding

Principles is seen throughout the Plan as they shape many of the individual policies and projects.

1. Economic prosperity
2. Human health
3. Environmental health
4. Equity
5. Resilience

[Chapter 3: Urban Form](#)

Policy 3.3 Equitable development.

Equitable development. Guide development, growth, and public facility investment to reduce disparities; encourage equitable access to opportunities, mitigate the impacts of development on income disparity, displacement and housing affordability; and produce positive outcomes for all Portlanders.

3.3.a. Anticipate, avoid, reduce, and mitigate negative public facility and development impacts, especially where those impacts inequitably burden communities of colour, under-served and under-represented communities, and other vulnerable populations.

3.3.b. Make needed investments in areas that are deficient in public facilities to reduce disparities and increase equity. Accompany these investments with proactive measures to avoid displacement and increase affordable housing.

3.3.c. Encourage use of plans, agreements, incentives, and other tools to promote equitable outcomes from development projects that benefit from public financial assistance.

3.3.d. Incorporate requirements into the Zoning Code to provide public and community benefits as a condition for development projects to receive increased development allowances.

3.3.e. When private property value is increased by public plans and investments, require development to address or mitigate displacement impacts and impacts on housing affordability, in ways that are related and roughly proportional to these impacts.

3.3.f. Coordinate housing, economic development, and public facility plans and investments to create an integrated community development approach to restore communities impacted by past decisions. See Policy 5.18.

3.3.g. Encourage developers to engage directly with a broad range of impacted communities to identify potential impacts of private development projects, develop mitigation measures, and provide community benefits to address adverse impacts.