

Feedback from Bay of Plenty District Health Board (Bay of Plenty DHB) on the Urban Form and Transport Initiative (UFTI) Interim Report

Overall support and commendation

The Bay of Plenty DHB commends the UFTI interim report for its comprehensive and transparent analysis which has been supported by purposeful stakeholder engagement throughout. In particular, the process of generating a long list of options and then assessing these against multiple lens criteria to arrive at a sensible shortlist is a high quality approach which has been missing from SmartGrowth over the years.

It is encouraging to see that the top three options that have become the short list in the interim report are all healthier, more sustainable and more equitable than the current development trajectory, and that this is now clearly articulated via comparison with the base case assessment. It should be pointed out that this finding validates what SmartGrowth partner forums have been advocating (unsuccessfully) to SmartGrowth for some time. Hence it is with much hope and anticipation by the BOPDHB that this report, containing its concrete analysis, may finally lead to concrete action that will protect and promote health and wellbeing for all in the Western Bay community as the future arrives.

Recommendation 1: Make an explicit commitment to advancing equity

Advancing [equity](#) is a paramount objective for the BOPDHB and is an important component of wellbeing and sustainable development in New Zealand. Reducing inequalities is also Goal 10 of the UN's Sustainable Development Goals and guides that policies should be universal in principle, paying attention to the needs of disadvantaged and marginalized populations.

Urban environments have a substantial role to play in advancing equity due to the influence these environments can have over the distribution in access to 'resources for daily living' such as health, education, employment, healthy food, natural environments, opportunities for socialising and so forth. Hence, advancing equity must be an explicit commitment in any plan relating to the urban environment.

In the context of UFTI, having a commitment to advancing equity is essentially about considering 'who wins' and 'who loses' as a result of development and change. That is, are the winners' already privileged groups in the community, or will this change help to 'level the playing field'? Advancing equity would require UFTI/Smartgrowth to look beyond general trends and indicators to also investigate the distribution of these within a community. Data needs to be disaggregated into population sub-groups and analysis must be undertaken into the impacts on disadvantaged communities.

[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”.

The BOPDHB strongly recommends the UFTI final report make an explicit commitment to advancing equity and that, using the above example from Portland (and its 2035 Comprehensive Plan – see appendix) as guidance, this commitment be weaved throughout the report, for example via its investment objectives, indicators and subsequent implementation programme.

For example, it is positive that the prosperity benefit statement contains “our economic productivity and prosperity is improving *for all*” however there is no method or intended action contained in the report to monitor if this benefit will indeed be realised. Housing affordability may generally improve over time, but is it improving for the most vulnerable, or more so for the middle and upper class?

It is also positive that there is an inclusive access goal; however until 100% of the population have inclusive access across all transport modes, analysis must be taken to understand who is without access and whether these are already disadvantaged groups.

The people profiles are a potentially useful idea, but they do not represent the most vulnerable sub-groups and hence this analysis is a missed opportunity for advancing equity. For example the extreme severance and social exclusion that could be experienced as a result of continued car-dependency by someone with more limited means is not explicit in the stories told about the base case scenario.

Finally, in areas where regeneration is expected (eg Te Papa Peninsula) a commitment to understanding and monitoring gentrification, as well as identifying and investing in mitigation strategies is essential.

Recommendation 2: Set bold and aspirational investment objectives

The Bay of Plenty DHB generally supports the investment objective themes identified, however given the seriousness and scale of future challenges such as climate change, bold and aspirational investment objectives are required to generate the necessary magnitude of action. This is especially important given the 50 year outlook of this plan. To determine that the objectives identified in the

UFTI interim report meet these criteria, there needs to be comparative baseline information provided. What is the current status of inclusive access, economic prosperity and environmental sustainability? How well will planned action ensure the achievement of these investment objectives?

The Bay of Plenty DHB suggests the current objectives do not meet all SMART criteria, as most lack targets. There is no target set for the proportion of the population living within travel thresholds of key social and economic opportunities and benchmarking against other NZ cities for equitable transport access is not bold when NZ as a whole is a car dependant nation. What improvement in housing affordability and freight network efficiency and effectiveness is planned for over the next 50 years? A small improvement over this length of time is not going to make a difference to the benefits sought.

Recommendation 3: Housing affordability investment objective (p5)

The housing affordability measure (as measured by the ratio of average income to average dwelling purchase price/rent) appears to be worded incorrectly. Does this measure try to describe the median multiple measure? If so, it should be worded as “the ratio median house price by the median gross [before tax] annual household income”. It is a very important difference because if the measure currently described is used, a small number of very high income households could make it look like affordability is improving.

Recommendation 4: Key performance indicators

It is acknowledged that aside from the investment objectives, a number of other key performance measures to monitor progress and guide investment and deliver decisions. BOPDHB recognises this as a critical piece of work for future transparency and accountability. The [Integrated Planning Guide for a healthy, sustainable and resilient future 3.0](#) published by Canterbury District Health Board contains a list of example performance measures which may be of assistance.

Noting the preceding comments on equity, it will be important to disaggregate data to measure the difference between population sub-groups, as appropriate.

Minor alteration: existing asset commitments (p8)

Please add the following statement to the ‘Existing asset commitments’ section which describes BOPDHB: “Support people to age-in-place and providing care and support in the community close to where people live”.

Thank you for this opportunity to provide feedback.

Appendix: 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 color, 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.