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Auckland Council

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Submission on Auckland Council Long-Term Plan 2024–2034

Thank you for the opportunity for the National Public Health Service – Northern Region, Health New Zealand – Te Whatu Ora to provide a submission on Auckland Council’s Long-Term Plan 2024–2034.

The National Public Health Service – Northern Region welcomes an opportunity to meet with you to discuss our submission.

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1. Overview

For Tāmaki Makaurau/Auckland to prosper, its people require good health, productive lives and to feel included in society. Good health is contingent upon various societal factors, including strong communities, access to socioeconomic resources, quality education, and a health-promoting physical environment. The enjoyment of the highest attainable standard of health is a fundamental human right.¹ Providing the social, economic, cultural, and environmental conditions that promote wellbeing within present and future communities is one of the main purposes of local government.²

The National Public Health Service (NPHS) is a directorate within Health New Zealand – Te Whatu Ora (Health NZ). This submission has been written by NPHS – Northern Region, a regional arm of the directorate covering Tāmaki Makaurau/Auckland and Te Tai Tokerau/Northland. NPHS cares about promoting and protecting the health and wellbeing of our communities and achieving equity within the population. Tāmaki Makaurau/Auckland faces a number of challenges such as rising inequity, increasing numbers of residents, an ageing population, climate change, a rising prevalence of long-term health conditions, and the impacts associated with harmful commodities, including tobacco and alcohol. The Long-Term Plan 2024 – 2034 (LTP) should confront the reality of growing demand for quality infrastructure and services as a result of these challenges, prioritising actions that advance equity or reduce inequity. Addressing these issues is essential to improving population health and the prosperity of Tāmaki Makaurau/Auckland.

NPHS acknowledges the complexities confronted by Auckland Council (Council) in addressing major financial challenges in a region facing significant social, economic, and environmental pressures. Consequentially, the LTP lends a pivotal opportunity for Council to be leaders and innovators in shaping an equitable and prosperous Tāmaki Makaurau/Auckland through ambitious transformational change.

This submission details some overarching concerns and recommendations with regard to the LTP consultation, before providing more specific commentary on the proposal, namely:

- 1) the overall direction, and;
- 2) funding across council service areas.

NPHS' principal concern that underpins the enclosed response is the ability of the LTP to achieve equitable outcomes within Tāmaki Makaurau/Auckland. Based on this priority and the surrounding evidence, NPHS favours the overall balance of rates and expenditure contained within the 'Pay More, Get More' proposal, as that is more likely to enhance the wellbeing of underserved

¹ <https://www.who.int/about/governance/constitution>

² Local Government Act 2002, section 10 (1)

communities. However, it is imperative to note that this alignment hinges on the understanding that Council bears accountability for advancing equitable outcomes through the implementation of the LTP. This entails ensuring that Council spending generates health gains for Māori, Pacific peoples, and other underserved communities, whilst also mitigating adverse impacts of rate rises on lower income households and residential tenants. By achieving this balance, Council can demonstrate its commitment to honoring Te Tiriti o Waitangi (in particular, Article 3 – Ōritetanga) and to achieving the goals of the Auckland Plan 2050, which recognises growing inequity as one of the three biggest challenges for Tāmaki Makaurau/Auckland.

2. Response to the consultation

Overarching comments

This section identifies opportunities for Council to improve the overall approach to the LTP consultation and provides overarching recommendations for LTP decision-making.

Te Tiriti o Waitangi

NPBS recommends greater reference to Te Tiriti o Waitangi in the LTP documents, such that acknowledgement of the articles of Te Tiriti is an integral component of the proposal. Implementing Te Tiriti o Waitangi throughout the proposal, rather than irregularly and in distinct sections, would endorse the Council's commitment to partnering with the community. Te Tiriti o Waitangi — in particular, Article 3 (Ōritetanga) — guides NPBS' approach to public health in Aotearoa/New Zealand. NPBS' role as a Crown agent is to uphold Te Tiriti o Waitangi to ensure equitable physical, mental and social wellbeing and health outcomes, for all in Tāmaki Makaurau/Auckland.

Similarly, the meaningful application of the articles of Te Tiriti o Waitangi by local government is essential to achieve optimal health and wellbeing in our communities. NPBS encourages Council to strongly consider how it can honour Te Tiriti in the adoption of the LTP and ensure that this is central to the development of future plans and policies.

Engagement and consultation

NPBS would like to see evidence of a greater commitment to engagement with diverse communities in Tāmaki Makaurau/Auckland. Council has a responsibility to ensure that the voices of Māori, Pacific peoples, disabled people, rangatahi/youth, refugees, new migrants, the LGBTQIA+ community, and other diverse communities are represented and reflected in its decision-making.

Language and tone

In addition to proactive outreach to engage more diversely with the community, accessibility of the consultation would be enhanced by a more inclusive framing and tone within the LTP documents. In particular, the documents would be improved by using language that is mana-enhancing and reflects the values of the communities that Council serves. Specific examples include:

- The terminology used to label the main proposals as 'Pay Less, Get Less', 'Central', and 'Pay More, Get More' may not be inviting for many in the community and could lead to misinterpretations. Firstly, the framing may inadvertently convey the assumption that all individuals have equal access to resources. It is important to acknowledge the role of structural drivers in shaping varying socioeconomic contexts within the population which affect people's access to the choices offered by Council. The current framing could be perceived as blame-oriented and consistent with a discourse of individual responsibility. In addition, the title of the 'Pay Less, Get Less' proposal could be misinterpreted as a reduction in rates, rather proposing a smaller increase in rates relative to the other proposals. To foster a more inclusive and accessible reading experience, NPHS recommends that future proposals employ language that is more transparent and sensitive to the broader community.
- NPHS recommends that the language used around the proposed change to the local board funding formula is amended – using the term 'equitable' instead of 'fair' would more accurately reflect Council's aim to rectify disparities (Refer to submission section '*Parks and Community*', page 9).
- A greater emphasis on the foundational values guiding the proposed LTP, that extend beyond the confines of fiscal discourse, would help the community to understand Council's visions for a thriving and prosperous Tāmaki Makaurau/Auckland.
- It is crucial that language used by Council in all documents reflects Māori as a partner under Te Tiriti o Waitangi, rather than a high needs population. Language that portrays Council's understanding of its role within this partnership could be significantly strengthened within the current LTP proposal.

Translating strategic priorities into meaningful action

NPBS supports the Council's prioritisation of wellbeing in the Auckland Plan 2050, particularly as it details the importance of supporting Māori identity and wellbeing and equitable outcomes. NPBS also supports the LTP's performance measurement framework that prioritises Māori outcomes across all investment areas. However, for Council to give effect to its strategic priorities, NPBS recommends that the LTP places greater emphasis on activities that will have a meaningful impact for Māori and groups experiencing disparities. For example:

- NPBS supports the inclusion of the '*Papakāinga and Māori Housing*' outcomes within Kia Ora Tāmaki Makaurau. Access to affordable, quality, safe housing is essential to wellbeing, and inequitable access is a significant driver of systemic health inequities in Aotearoa/New Zealand. The impacts of colonisation and breaches of Te Tiriti o Waitangi have led to an underrepresentation of Māori in home ownership in Aotearoa/New Zealand. Whilst it is encouraging to see Council's commitment to providing expert advice and investment in Māori housing, papakāinga and marae infrastructure, NPBS would like to see greater commitment to addressing the economic and structural barriers to home ownership. Such activities can also generate gains in safe housing access, and hence health outcomes, for Pacific peoples, tāngata whaikaha, and lower-income earners. The importance of Council activities in this area is detailed in this submission under '*City and local development*', page 12.
- If Council are to reduce expenditure in certain areas, NPBS urges Council to prioritise the retention of initiatives that enhance Māori wellbeing and reduce inequities. The benefits of this approach are reiterated throughout our comments on funding across Council services. This includes retaining concentrated spending on:
 - 1) infrastructure and services in areas of higher socioeconomic deprivation;
 - 2) activities that address major sources of health inequities in Tāmaki Makaurau/Auckland, including access to quality affordable housing and health-promoting transport options, and protection against harmful commodities; and
 - 3) initiatives designed and delivered in partnership with mana whenua.

Overall direction: Achieving an equitable balance of expenditure and rates

NPHS' foremost priority is that the LTP achieves equitable outcomes for communities in Tāmaki Makaurau/Auckland. Based on this priority and surrounding evidence, NPHS favours the overall balance of rates and expenditure detailed under the 'Pay More, Get More' proposal, as that most likely to enhance the wellbeing of underserved communities. However, it is imperative to note that this alignment hinges on the understanding that Council bears accountability for advancing equitable outcomes through the implementation of the LTP. To achieve this balance, NPHS recommends that Council factor the following in its decision-making:

- Increasing Council funding and service provision in parallel with raising residential rates has the potential to reduce inequity due to; 1) the inequitable distribution of homeownership in Aotearoa/New Zealand, and; 2) the opportunity for additional Council spending to achieve health gains for underserved communities. A recent report released by Health NZ found that 21% of Pacific people and 31% of Māori own their own home, as compared to 58% of European/Other people.³ In the Northern Region (Tāmaki Makaurau/Auckland and Te Tai Tokerau/Northland), non-Māori / non-Pacific live on average 8 years longer than Māori and 7 years longer than Pacific people.³ These inequities are avoidable and unjust and are a result of systemic social and economic drivers. Home ownership is one of the key platforms for wealth, particularly in Aotearoa/New Zealand. Investing rating income in a range of services available to both those who own property and those who do not is a mechanism for enabling all to benefit from our public resources.
- The Local Government Act 2002 states that the purpose of local government is to “*promote the social, economic, environmental, and cultural well-being of communities in the present and for the future*”. Consequently, it is incumbent upon Council to balance financial levers in a way that addresses current inequities in Tāmaki Makaurau/Auckland whilst also safeguarding the interests of future generations.
- Whilst a parallel increase in both Council activities and residential rates presents opportunities for Council to reduce current inequities and promote intergenerational equity, it is crucial to consider the potential impacts of rate rises on lower income households, as well as residential tenants (via rent increases). NPHS urges Council to factor these impacts into decisions around

³ Health New Zealand – Te Whatu Ora (2024). Aotearoa New Zealand Health Status Report 2023. <https://www.tewhatauora.govt.nz/publications/health-status-report/>

the level of rate increases, and to take steps to mitigate any impacts, such as by increasing rate remissions for low-income homeowners. NPHS also encourages Council to consider the accessibility of the rate remission scheme and minimise the complexity of the application process to the most practicable extent.

- To ensure an equitable approach, it is vital that any increases in Council investment or operational spending, address disparities in opportunities across groups in Tāmaki Makaurau/Auckland. To monitor this, NPHS encourages Council to develop a consistent equity monitoring framework across Council group activities that sits alongside the measurement frameworks for ‘*Climate mitigation and adaptation*’ and ‘*Māori outcomes*’. NPHS notes the inclusion of ‘*Communities of greatest need*’ in the performance measurement framework diagram provided on page 7 of the Supporting Information document. However, the detail provided on the performance measurement framework on page 651 (*Section 8.2*) of the Supporting Information document and page 30 of the Consultation document do not identify an equity measure. In addition, the performance measures listed under each Council service area do not appear to monitor the extent to which activities will address disparities. If an equity monitoring framework already exists, it would be encouraging to see these details clearly reflected in the LTP documents.

Funding across Council service areas

This section provides specific commentary on the proposed activities and initiatives across the service areas identified in the LTP.

Transport

- NPHS encourages Council to progress with planned active transport projects and is concerned about the impacts of reductions to expected cycleway extensions under the ‘Pay Less, Get Less’ proposal. A connected and safe cycling network is one of the biggest drivers of increased active transport use. Active transport has considerable positive effects on physical and mental health of individuals, improving heart health, reducing risks of some cancers and improving sleep quality and stress. Furthermore, the provision of safe active transport infrastructure is vital for protecting Aucklanders from the health impacts of air pollution and for reducing carbon emissions. Council has recognised the importance of promoting safe and equitable access to active transport in the Climate Action Plan and the Auckland Plan 2050 (*Outcome: Transport and Access*). Giving effect to these goals within the current LTP can demonstrate Council’s commitment to supporting an equitable, healthy, thriving, sustainable Tāmaki Makaurau/Auckland.

- NPHS encourages Council to retain the planned funding for transport safety projects and continue to take meaningful steps towards reducing deaths and serious injuries on the roads in Tāmaki Makaurau/Auckland. The implementation of safe speeds, raised pedestrian crossings, red light cameras, and other traffic calming measures are cost-effective methods to reduce road deaths and serious injuries.^{4,5} Implementation of the current Katoa, Ka Ora proposal is expected to reduce Death and Serious Injuries (DSI) by approximately 184 over the next 10 years.⁵ In addition, the perception of safety is one of the main barriers preventing Aucklanders from walking and cycling. Research in Tāmaki Makaurau/Auckland found that parents and children would be more likely to walk and cycle if there were more road safety features.⁶ Ensuring that transport safety projects are adequately funded is crucial for Council to meet both its goals under the Auckland Plan 2050 (*Outcome: Transport and Access, Area 6*) and its obligations under the Local Government (Auckland Council) Act 2009, which requires Auckland Transport to contribute to a safe transport system.
- NPHS supports the introduction of time of use charging within Tāmaki Makaurau/Auckland, if implemented in an equitable manner and in tandem with improving access to other transport options. If done well, a time of use charging scheme can present multiple co-benefits, including reduced carbon emissions, improved air quality, and additional Council revenue that can be allocated to other health-promoting initiatives.

The London congestion charging scheme was found to reduce harmful emissions (particulate matter and nitrogen dioxide) from vehicles and contributed (alongside other air quality interventions) to better air quality.⁷ In 2016, over half of all Aucklanders (59.4%) were exposed to levels of nitrogen dioxide (NO₂) higher than the current World Health Organization's Air Quality Guidelines, with higher rates for Pacific Peoples (74.5%).⁸ These exposure levels were overwhelmingly from vehicle emissions. This is estimated to have caused 685 premature deaths and 3504 respiratory and cardiovascular hospitalisations in Tāmaki Makaurau/Auckland,

⁴ Fisa, R., Musukuma, M., Sampa, M. et al. Effects of interventions for preventing road traffic crashes: an overview of systematic reviews. *BMC Public Health* 22, 513 (2022). <https://doi.org/10.1186/s12889-021-12253-y>

⁵ <https://at.govt.nz/media/1990950/auckland-transport-speed-management-plan-high-level-economic-assessment.pdf>

⁶ Smith M, Amann R, Cavadino A, Raphael D, Kearns R, Mackett R, Mackay L, Carroll P, Forsyth E, Mavoia S, et al. Children's Transport Built Environments: A Mixed Methods Study of Associations between Perceived and Objective Measures and Relationships with Parent Licence for Independent Mobility in Auckland, New Zealand. *International Journal of Environmental Research and Public Health*. 2019; 16(8):1361. <https://doi.org/10.3390/ijerph16081361>

⁷ Beevers, S. D., & Carslaw, D. C. (2005). The impact of congestion charging on vehicle emissions in London. *Atmospheric environment*, 39(1), 1-5.

⁸ ⁹ Kuschel et al (2022). Health and air pollution in New Zealand 2016 (HAPINZ 3.0): Volume 1 – Finding and implications. (Report prepared by G Kuschel, J Metcalfe, S Sridhar, P Davy, K Hastings, K Mason, T Denne, J Berentson-Shaw, S Bell, S Hales, J Atkinson and A Woodward for Ministry for the Environment, Ministry of Health, Te Manatū Waka Ministry of Transport and Waka Kotahi NZ Transport Agency, March 2022).

alongside 6144 new cases of asthma among children. The annual social costs are estimated to be \$3.2 billion from both direct hospital costs and restricted activity days where people could not work.

To avoid any unintended consequences for the wellbeing of Aucklanders, it is important that the introduction of time of use charging in Tāmaki Makaurau/Auckland parallels the provision of accessible and safe public and active transport infrastructure. Furthermore, these charges should be implemented according to international experiences of minimising negative impacts on those experiencing higher levels of socioeconomic disadvantage, including by omitting routes that are pivotal to the connection of higher deprivation areas.

Water

- NPHS supports investment in infrastructure that will both mitigate the public health risks associated with future wastewater overflows into the harbours and protect Aucklanders from the impacts of future flood events. Importantly, the rollout of these infrastructure upgrades should be focused in areas of higher socioeconomic deprivation.

Parks and Community

- NPHS supports Council's proposed change to the local board funding formula that gives a greater weighting to deprivation in the distribution of funds. However, the use of the term 'equitable' rather than 'fair' within the LTP documents would more accurately reflect Council's intentions. 'Fair' is subjective and can lead to misunderstandings. Conversely, 'equitable' explicitly conveys the idea of addressing inequity or imbalance in resource distribution. It shifts the focus from an ambiguous notion of fairness to a deliberate effort to ensure communities have access to the resources they need to thrive.
- NPHS supports the continuation of \$700 million of operational funding to transition from a traditional asset-based delivery model supporting direct service provision, to a model focused on integrated services, partnerships, and digital services. A shift towards working in a more flexible, modern environment will be important for delivering on recognised gaps in service provision and providing greater benefits to communities.
- NPHS supports the retention of grant funding for play activations and is concerned about the impacts of a potential reduction in funding under the 'Pay Less, Get Less' proposal. Amid the challenges of urban redevelopment, the vital role of play activations in fostering children's creative and physical development becomes increasingly pronounced. Play is not merely a

pastime; it's a foundational element in children's holistic development, offering a myriad of benefits across cognitive, physical, social, and emotional domains. Play evolves from simple exploratory actions in infants to structured, complex activities in older children, significantly impacting their social, physical, and cognitive skills. Integrating play activations within urban environments is not just an investment in children's immediate enjoyment but a strategic move towards nurturing the next generation's well-being and development.^{9,10} By continuing to fund play activations, Council can demonstrate its commitment to honouring Te Tiriti o Waitangi by promoting equitable access to health and wellbeing for all children, particularly benefiting Māori, Pacific peoples and underserved communities. These have the potential to reduce long-term healthcare costs through fostering early physical and mental health. Additionally, supporting play activations adheres to the mandates of the Local Government Act 2002 for Councils to enhance community wellbeing.

- NPHS supports the proposed funding of \$35 million toward indoor sports facilities. By increasing access to such facilities, especially in areas experiencing higher levels of socioeconomic deprivation, Council can promote physical activity and social cohesion. These facilities will be especially crucial for promoting the health and wellbeing of tamariki/rangatahi in Tāmaki Makaurau/Auckland.
- NPHS supports the retention of current opening hours of community facilities and is concerned about the impacts of a potential reduction under the 'Pay Less, Get Less' proposal. Reducing the operating hours for sports and recreation centres will affect opportunities for physical activity and, consequently, community wellbeing and social cohesion. Recreational facilities play a critical role in enhancing community wellbeing by serving as essential spaces for physical activity, mental relief, and social interaction. They act as communal grounds that encourage healthier lifestyles, aiding in the reduction of diseases associated with sedentary living. Socially, these facilities foster a sense of community, building social networks and support systems crucial for emotional wellbeing. Protecting the accessibility and operational readiness of these centres is not only about facilitating leisure or physical activities; it's about securing a foundation for a healthier, more cohesive, and inclusive Auckland.¹¹ By protecting the opening hours of these facilities, Council can demonstrate its commitment to Te Tiriti o Waitangi to ensure equitable health opportunities for all demographics, including Māori, Pacific peoples, tāngata whaikaha, and other underserved groups.

⁹ <https://sportnz.org.nz/resources/five-phases-of-regional-play/>

¹⁰ <https://theeducationhub.org.nz/what-is-play-and-why-is-it-important-for-learning/>

¹¹ <https://sportnz.org.nz/resources/the-value-of-sport/>

- NPHS recommends ensuring that access to safe, clean drinking water (and related infrastructure) is prioritised through any decisions on asset disposal or service reduction. This includes the provision of drinking fountains and refill stations, especially in spaces used frequently by children such as parks and playgrounds. Equitably ensuring that all communities have access to clean drinking water in public spaces promotes water drinking, protects teeth and reduces potential for plastic single use bottles. This aligns strategically with Auckland Plan 2050 (*Outcome: Belonging and Participation*) and Auckland's Climate Plan.
- Council plays a pivotal role in shaping local food environments. To meet its legislative obligations to promote community wellbeing under the Local Government Act 2002, councils need to take all practicable steps to ensure that these environments promote healthy food choices. NPHS recommends Council incorporates the following actions into its planning:
 - a) Commit to healthy environments within Council itself as well as within community facilities (for example through embedding the Healthy Environment Approach) to support healthy options as the first and easiest choice.¹²
 - b) Prioritise policies that promote health-oriented marketing environments within Council-controlled Organisations (CCOs) to promote healthy lifestyle choices. An existing example is Auckland Transport's policy on marketing that does not permit the promotion of alcohol, gambling, tobacco or vaping.¹³ Policies such as this could be strengthened by emphasising the importance of preventing marketing to children for ultra-processed food and drinks.
- NPHS encourages Council to ensure the funding of community gardens is protected under the current LTP. Community gardens generate a range of health benefits via improvements to social, economic, and cultural wellbeing. They are a practical setting that offer opportunities to practice and revitalise traditional Māori kai practices.¹⁴ In addition, community gardens play a vital role in supporting local food security, as identified in Te Tāruke-ā-Tāwhiri: Auckland's Climate Plan (Action Area 4). Their role as a climate adaptation tool further extends to their

¹² <https://healthyfamiliessouthauckland.nz/showcasing-the-impact-of-healthy-environment-approach-in-local-government-3/>

¹³ [Advertising policy \(at.govt.nz\)](#)

¹⁴ McKerchar C, Bowers S, Heta C, Signal L, Matoe L. Enhancing Māori food security using traditional kai. *Glob Health Promot.* 2015 Sep;22(3):15-24. doi: 10.1177/1757975914543573. Epub 2014 Aug 1. PMID: 25085479.

ability to provide buffering effects against climate change as an urban green space.¹⁵ Funding of these important community assets not only provides the required physical resources, but also supports paid staff who hold expertise and skills that enable the gardens to function. The retention of this funding is strategically aligned with the Auckland Plan 2050 (*Outcomes: Homes and Places; Māori Outcomes and Wellbeing*), the Auckland Climate Action Plan, and enables Council to meet its obligations under Te Tiriti o Waitangi and the Local Government Act 2002.

City and local development

- NPHS supports Council investment in the urban regeneration programme and are concerned about the impacts of potential reductions in projects that contribute to improving quality compact form and equitable housing access in Tāmaki Makaurau/Auckland.

Access to affordable quality housing is a fundamental human right and a key social determinant of health. A study analysing data from 2010-2017 estimated that illnesses attributable to unsafe and substandard housing in Aotearoa/New Zealand resulted in \$141 million of direct costs to the public sector annually. Furthermore, the study estimated 229 deaths attributable to these conditions annually, resulting in a cost to society of \$1 billion.¹⁶ Access to optimal housing conditions is inequitably distributed within society, and a direct contributor to health inequities.¹⁷ The provision of affordable, safe, quality housing is essential for achieving health gains for Māori, Pacific peoples, tāngata whaikaha, and low-income earners. By continuing to invest in activities that will catalyse the development of affordable quality housing, Auckland Council can continue to take meaningful steps towards achieving the goals of the Auckland Plan 2050 (*Outcomes: 'Belonging and Participation', 'Māori identity and Wellbeing', and 'Homes and Places'*), and demonstrate its commitment to supporting Māori outcomes and meeting its obligations under Te Tiriti o Waitangi.

In addition to improving access to affordable quality housing, the urban regeneration programme is important for fostering the physical conditions required for thriving communities, including by improving access to key amenities, such as public and active transport, supermarkets, green spaces, and community facilities. Improving the overall

¹⁵ Clarke, Mysha & Davidson, Melissa & Egerer, Monika & Anderson, Elsa & Fouch, Nakisha. (2019). The underutilized role of community gardens in improving cities' adaptation to climate change: a review. *People, Place and Policy Online*. 12. 241-251. 10.3351/ppp.2019.3396732665.

¹⁶ Riggs L, Keall M, Howden-Chapman P, Baker MG. Environmental burden of disease from unsafe and substandard housing, New Zealand, 2010-2017. *Bull World Health Organ*. 2021 Apr 1;99(4):259-270. doi: 10.2471/BLT.20.263285. Epub 2021 Feb 1. PMID: 33953443; PMCID: PMC8085632

¹⁷ Review of the Impact of Housing Quality on Inequalities in Health and Well-Being
Philippa Howden-Chapman, Julie Bennett, Richard Edwards, David Jacobs, Kim Nathan, David Ormandy. *Annual Review of Public Health* 2023 44:1, 233-254

quality of new and existing neighbourhoods has multiple co-benefits, including reducing carbon emissions, improving air quality, increasing community resilience, and promoting economic, social, and physical wellbeing.¹⁷

If urban regeneration activities do need to be reduced, NPHS urges Council to do so equitably and in a way that will continue to protect public health in Tāmaki Makaurau/Auckland. This can be achieved by retaining projects that will have the greatest benefit for Māori and Pacific peoples, are focused in areas of higher socioeconomic deprivation, and are dedicated to enabling the delivery of affordable quality housing and accessible health-promoting transport infrastructure.

Environment and regulation

- NPHS supports ongoing investment in community-led environmental initiatives. NPHS is concerned about a proposed reduction in support for these initiatives, particularly with regard to decreased support for mana whenua to exercise kaitiakitanga. Continuing these activities contributes to thriving communities, increases social cohesion, and supports cultural wellbeing. Ongoing investment will demonstrate Council's commitment to supporting Māori outcomes, honouring Te Tiriti o Waitangi, and promoting thriving, resilient communities.

Council support

- NPHS supports an increase in Kia Ora Tāmaki Makaurau funding within the central proposal as a key avenue through which Council can support Māori outcomes and deliver on its Te Tiriti o Waitangi obligations.
- NPHS would like to see a reassurance within the LTP that funding for the remaining Council-operated childcare centres in Tāmaki Makaurau/Auckland will be maintained.

The provision of these services is strategically aligned with The Auckland Plan 2050, which acknowledges that children have a right to an education and that there is consistent evidence linking good quality education, especially childhood education, with improved skills development and lifelong learning. In addition, Council's Child and Youth Strategic Action Plan (I Am Auckland) prioritises children and young people supported at all levels of education, from early childhood education.

Importantly, Kauri Kids services increase equitable access to high-quality education from a young age by providing a low-cost and highly flexible option as compared to for-profit private

providers. Aotearoa/New Zealand has some of the highest childcare costs in the Western world. According to the latest OECD data from 2018, a typical couple who both earn the average wage and have two kids spends 28% of their income on childcare.¹⁸ Furthermore, Kauri Kids centres are sites of best-practice community initiatives that promote the health and wellbeing of tamariki and whānau. All services are located within or next to existing Council facilities (community houses, pool or leisure centres) that promote supportive environments for whānau to participate in community initiatives.^{19,20} In addition, Kauri Kids centres are also case studies on healthy kai and wai through initiatives such as the Healthy Environment Approach.²¹

- It is important that Council's current resource allocation for alcohol licensing services is maintained at or above its current levels to ensure whānau and communities in Tāmaki Makaurau/Auckland are safe from alcohol-related harm. Alcohol causes substantial harm to individuals and communities, with some communities, including Māori, experiencing higher levels of harm than others from the wide availability of alcohol.^{22,23} Continuing to provide adequate resource to Council's regulatory role within alcohol licensing is key to controlling the availability of alcohol, ensuring that Council meets its goals under the Alcohol Harm Minimisation Strategy (2022) and its commitment to equitable health outcomes for Māori under Te Tiriti o Waitangi.

North Harbour Stadium

NPBS does not take a position on the Council's approach to managing the future of the North Harbour Stadium precinct. However, NPBS wishes to raise the potential public health risks associated with a move to a private sponsorship model, which may allow access for harmful commodity industries such as alcohol and ultra-processed food companies.

Keeping North Harbour Stadium free from alcohol marketing is vital for Auckland Council to meet its commitment to minimise alcohol-related harm in Tāmaki Makaurau/Auckland.²⁴ There is a causal

¹⁸ Organisation for Economic Co-operation and Development (2021). Net childcare. <https://data.oecd.org/benwage/net-childcare-costs.htm>

¹⁹ Auckland Council (2023). Kauri Kids early childhood education centres. <https://aucklandleisure.co.nz/kaurikids>

²⁰ Ministry of Education, New Zealand Government (2021). Education Counts, Early childhood services: ECE directory builder. <https://www.educationcounts.govt.nz/directories/early-childhood-services#>
<https://www.educationcounts.govt.nz/directories/early-childhood-services#>

²¹ The Southern Initiative (2023). Resources. <https://www.tsi.nz/resources>

²² World Health Organisation. (2022). *Alcohol*. Retrieved from:
<https://www.who.int/news-room/fact-sheets/detail/alcohol>

²³ Alcohol Health Watch. (2024). *Harm to Māori*. Retrieved from:
<https://www.ahw.org.nz/Issues-Resources/Harm-to-M%C4%81ori>

²⁴ [Our Statement of Commitment on Minimising Alcohol-Related Harm in Tāmaki Makaurau Auckland](https://www.aucklandcouncil.govt.nz/Our-Statement-of-Commitment-on-Minimising-Alcohol-Related-Harm-in-Tamakai-Makaurau-Auckland) ([aucklandcouncil.govt.nz](https://www.aucklandcouncil.govt.nz))

relationship between youth exposure to alcohol marketing and earlier uptake of drinking.²⁵ Māori and Pacific childrens' exposure to alcohol marketing is five and three times that of Pākehā children, respectively.²⁶

In addition to concerns around alcohol marketing, a shift to a private sponsorship model may result in an influx of advertising, sponsorship and/or promotion of ultra-processed food brands. Adopting a Healthy Environment Approach would minimise unintended negative consequences for children's exposure to harmful food and drink marketing in this setting and align with the Council's role under the Local Government Act 2002 to promote the overall well-being of the community.¹²

If the North Harbour Stadium does move to a private sponsorship model, NPHS urges Council to ensure that this does not result in any marketing of alcohol, ultra-processed food brands, tobacco and vaping, or gambling to the community.

Conclusion

Thank you for the opportunity to submit on Auckland Council's Long-Term Plan 2024–2034. NPHS and Council share a commitment to reduce inequities and achieve wellbeing for all within Tāmaki Makaurau/Auckland under Te Tiriti o Waitangi. This submission highlights opportunities for Council to meet this commitment under the current LTP, namely through the equitable provision of affordable quality housing, accessible healthy transport options, early childhood education, healthy kai, drinking water, and community facilities; investment in community-led initiatives; and activities to mitigate the inequitable impacts of extreme weather events and harmful commodities. NPHS welcomes the opportunity to discuss any of the points raised in this submission.

²⁵ Sargent JD, Babor TF. The Relationship Between Exposure to Alcohol Marketing and Underage Drinking Is Causal. *J Stud Alcohol Drugs Suppl.* 2020 Mar;Sup 19(Suppl 19):113-124. doi: 10.15288/jsads.2020.s19.113. PMID: 32079567; PMCID: PMC7063998.

²⁶ Chambers T, Pearson AL, Kawachi I, Stanley J, Smith M, Barr M, Mhurchu CN, Signal L. Children's home and school neighbourhood exposure to alcohol marketing: Using wearable camera and GPS data to directly examine the link between retailer availability and visual exposure to marketing. *Health Place.* 2018 Nov;54:102-109. doi: 10.1016/j.healthplace.2018.09.012. Epub 2018 Sep 22. PMID: 30253378.