

Submission on Nelson City Council's Kāinga Ora Feedback

**Proposal to sell 42 Rutherford Street
and/or 69 Achilles Avenue to Kainga Ora
for social and affordable housing**

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Introduction

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Nelson City Council's Kāinga Ora proposal.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.

General support

3. NMH strongly supports proposals to increase the amount of social and affordable housing stock in Nelson and agrees with the proposal to sell 69-101 Achilles Avenue and 42 Rutherford Street to Kāinga Ora.
4. The sustainable use of land and infrastructure, compact walkable neighbourhoods promoting incidental exercise and improved social interactions, and more affordable housing for smaller household sizes are just some of the benefits that urban intensification can provide, leading to improved community health and wellbeing outcomes.
5. Nelson is facing housing shortages and requires further social and affordable housing options. Nelson-Tasman is one of the regions at the forefront of New Zealand's housing shortage, with available stock dropping by 50 per cent between December 2019-2020¹. There is a similar squeeze in the rental market, with the Trade Me Rental Price Index showing in January 2021, the median rent in Nelson/Tasman was up 10.3 per cent on the previous year to \$480 a week². The impact of this housing crisis on the community is very evident with the rising numbers of homeless people, the families living with housing vulnerability, people leaving the region or being more reluctant to move here, and a growing number of residents struggling to keep a roof over their heads,³ There are now 282 people awaiting social housing in Nelson as at June 2021 compared with 24 in June 2016.⁴
6. However, NMH considers that a range of conditions need to be added to Kainga Ora & Nelson City Council agreement to ensure that any housing built is sustainable, accessible, healthy and fit for purpose.

¹ [Nelson's housing stock halved in 2020 continuing 'long-term trend' | Stuff.co.nz](#)

² [Storage squeeze reflects housing shortage as people wait to buy or rent | Stuff.co.nz](#)

³ [Key Issue: Housing affordability and intensification | Long Term Plan 2021-2031 | Shape Nelson](#)

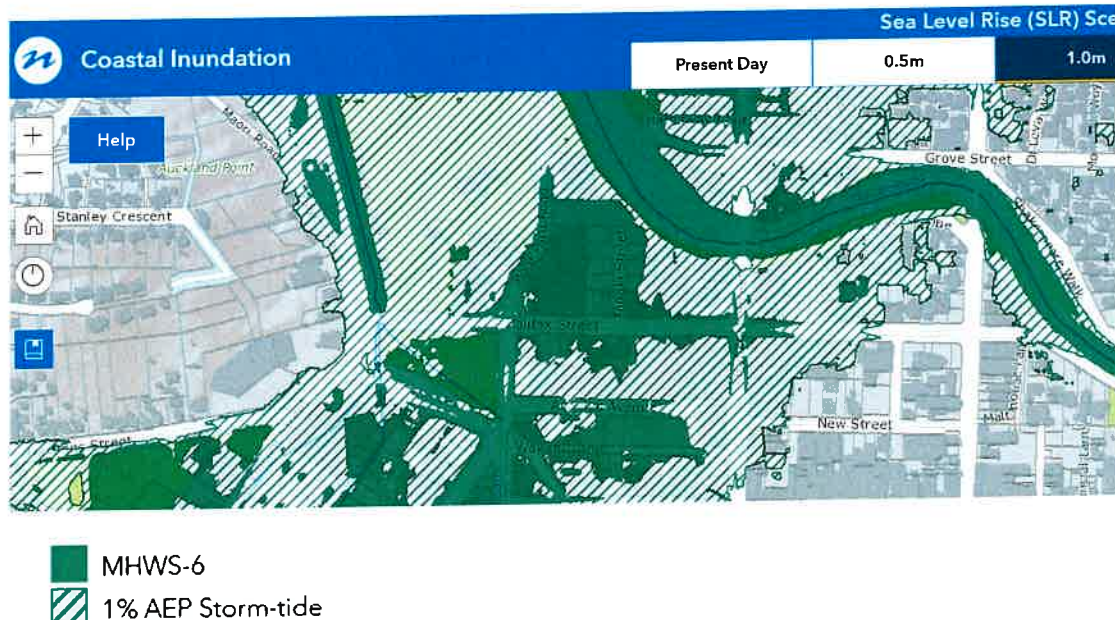
⁴ <https://www.msd.govt.nz/about-msd-and-our-work/publications-resources/statistics/housing/index.html>

Design Outcomes

7. NMH agrees with the proposed design outcomes because these will help deliver healthy housing outcomes for Central Nelson. NMH was pleased to see that Kāinga Ora had expressly stated that they would integrate a broad array of sustainability and well-being initiatives into the development (pg. 15 for the Consultation Document) including a commitment to building to 6 Homestar standards which will ensure that these new houses are warmer, healthier and more energy-efficient. NMH supports accessible design to the surrounding streets, design compatibility with the adjacent public spaces, and good connections to public transport.

Adapting to Sea Level Rise Inundation

8. NMH does have concerns about access to the proposed housing area. Currently the two sites are prone to seawater inundation during king tide events⁵. This will become exacerbated as a result of sea level rise. This is clearly seen on the NCC's Coastal Inundation maps (1.0m scenario) shown below. NMH notes that the proposed new library which is in close proximity will be built 1.2m higher than the current site and will be able to be raised further. There is little mention in this consultation document of the need for adaptive design to be incorporated in order for the buildings to adapt to sea level rise. NMH would like to see explicit mention within the Design Outcomes of adaption to sea level rise.



9. NMH notes that the Design Outcomes have stated the need for appropriate cycle storage and servicing facilities. It may be as a way of sea-level adaption, that significant cycle storage facilities are placed on the ground floor along with community spaces. These spaces could be lifted as needed over time.

⁵ [Stuff report on King Tide Flooding 2020, 2018, 2016](#)

Energy Efficiency

10. NMH supports the design for Kāinga Ora to improve the environmental performance of its housing stock. NMH recommends that in addition to building to 6 Homestar standards, consideration is also given to integrating solar power, rainwater harvesting and roof top gardens into the design.

Proportion of social housing units

11. The consultation document states that that less than 50% of household units will be social housing. This could mean that between 1 or 85 homes are allocated as social housing. This is a significant difference.
12. As socially responsible agencies, Kāinga Ora and NCC should guarantee that a significant proportion of the housing is for social housing units. In addition to this, the other housing developed on the site should comprise affordable housing with the right mix of sizes and types of units that would appeal to different whanau configurations and be priced in a way that people can move from renting into home ownership. Scarcity of affordable homes has become a major issue for Nelson which needs to be addressed. This development opportunity can put restrictions in place that provides social and affordable housing in perpetuity, rather than building for predominately for the private market.
13. NMH would like to see that at least 49% of houses are social housing units, and the remainder are affordable houses with price controls and conditions that they can only be sold back to Kāinga Ora to be resold again as affordable housing.
14. It is important that the number of social housing numbers are clearly articulated as this provides community support agencies information about the level of wrap-around services that may be required.

Housing Typology

15. NMH notes that there has been no mention of the housing typologies that would be included in the development. Nelson Marlborough has a higher proportion of its population in the 65+ year age group than other New Zealand regions.⁶ Consideration needs to be given to providing a number of 1 and 2 bedroom units to cater for older people. In addition, larger units could be added to cater for those with larger families and those living in multi-generational households.

Communal Spaces

16. NMH is pleased to see that communal open spaces are included into the design in regards to non-residential activities. NMH also recommends that residential

⁶ [Population of Nelson Marlborough DHB | Ministry of Health NZ](#)

communal spaces are also included so that residents have opportunity to casually meet or come together. The inclusion of rooftop gardens that offer good views might facilitate this. A roof-top garden could include individual garden plots that enable access to nature and the opportunity to grow food. This approach has been taken in The Commons in Brunswick Victoria.⁷ In addition The Commons fire stairwell is designed to be inviting, with operable windows that provide natural ventilation and daylight. This encourages people to walk instead of using the lift, promoting physical activity and reducing energy use. This could also be integrated into the design.

The inclusion of universal design

17. The design outcomes must include Universal design as a prerequisite for all units.
18. Dwellings have long lifetimes and at some stage in a dwelling's life it will be either occupied or visited by someone with mobility issues.⁷ Universal design ensures a home is sustainable and can be adapted to meet the life-time needs of the resident from the stage where they have young children in pushchairs to when they are elderly and/or have a disability.⁸ Specifically, it 'describes the concept of designing housing features to be aesthetic and usable to the greatest extent possible by everyone, regardless of their age, ability, or status in life'.⁹
19. Older people have more sensory and physical limitations than younger people. Housing that does not meet their needs exacerbates existing health conditions and heightens the impacts of impairment. This triggers dislocation from their communities, admission to an unnecessarily high level of care and support, and shifts the cost of what is primarily a housing problem onto the health and social services sectors.¹⁰
20. In March, 2021, the Disability Rights Commissioner has stated that "*the lack of accessible housing for disabled people had been at crisis levels for many years*". There is a shortage of accessible housing for disabled people in terms of buying, rental and social housing.¹¹
21. Universal design can also lessen the impact of falls. Nearly 400,000 medically treated injuries attributed to falls occurred in the home and community settings in

⁷ [The case for good design: Housing | Office of the Victorian Government Architect \(ovga.vic.gov.au\)](https://www.ovga.vic.gov.au/the-case-for-good-design-housing)

⁸ Lifemark. 2017. Positive changes: More access to more homes. Accessed 16 November 2017
<http://www.lifemark.co.nz/news/positive-changes-more-access-to-more-homes/>

⁹ BRANZ. N.d. *Universal Design*. Accessed 14 November 2017
https://www.branz.co.nz/cms_display.php?sn=215&st=1

¹⁰ Saville-Smith K, Saville J. 2012. *Getting accessible housing: Practical approaches to encourage industry take-up and meeting need*. Centre for Research, Evaluation and Social Assessment for the Office for Disability Issues and the Ministry of Business, Innovation and Employment.

¹¹ [Human Rights Commission :: Disabled people need to be key in Government's new public housing plans \(hrc.co.nz\)](https://www.hrc.co.nz/human-rights-commission--disabled-people-need-to-be-key-in-government-s-new-public-housing-plans)

2012.¹² A community trial in Taranaki has shown that the adoption of universal design modifications have resulted in an estimated 26% reduction in the rate of injuries caused by falls at home per year in those houses where modifications have been made.¹¹

22. BRANZ research¹³ has shown that it is considerably cheaper and less disruptive to incorporate universal design features into a new build than retrofit the same house later. As an example, the average extra cost of equipping a new house with universal design features is \$1,720 while retrofitting these new houses at a later date would cost an extra \$14,000 on average (using 2011 figures).¹⁴
23. Consideration must be given to the incorporation of universal design standards throughout the whole development.

¹² Keall MD, Nevil P, Howden-Chapman P et al. 2014. *Home modifications to reduce injuries from falls in the home, injury prevention study: A cluster-randomised controlled trial*. Otago University, Massey University and Building Research Association New Zealand.

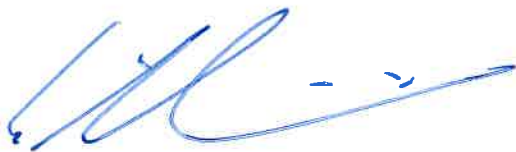
¹³ [Study report SR263 Lifetime housing - the value case \(d39d3mj7qio96p.cloudfront.net\)](#)

¹⁴ [Universal design cost estimator | BRANZ](#)

Conclusion

24. NMH thanks NCC for the opportunity to comment on the Kāinga Ora Proposal.
25. In summary, NMH strongly supports proposals to increase the amount of social and affordable housing stock in Nelson. NMH would like to see the following aspects added to the Design Outcomes:
- a. Explicit mention of adaption to sea level rise
 - b. Requirements for integrating solar power, rainwater harvesting and roof top gardens
 - c. that at least 49% of houses are social housing units, and the remainder are affordable houses with price controls and conditions that they can only be sold back to Kāinga Ora to be resold again as affordable housing.
 - d. Universal design requirements are mandatory for all homes Residential communal open spaces are included
 - e. Housing typology is included
26. While NMH supports the intent of the proposal, it considers that it could go further in providing a diversity and form of housing which caters for Nelson's ageing population and general preference to age in place, and those with a disability wanting to lead more independent lives.

Yours sincerely



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References