

TE WAIORA



Nelson Marlborough
Health

Nelson City Council

**Private Plan Change 28 –
Maitahi Bayview**

8 December 2021

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Submitter details

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 consultation on the Private Plan Change 28 – Maitahi Bayview
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.
3. NMH could not gain an advantage in trade competition through this submission.
4. Please note that the Public Health Service that prepares these types of submissions has been extremely busy with COVID response and as such this submission may not be as thorough as it could be.
5. NMH is pleased to see that there has been extensive consultation with interested parties but notes that its Public Health Service has not been identified as one. NMH would like to be considered as an interested party.

General Comments

6. NMH remains neutral regarding the Private Plan Change. However should this Plan Change go ahead, there is a number of matters of interest and concern to NMH.
7. Urban environments play an essential role in shaping human health. There are many perceived benefits of compact urban forms, which include: less car dependency thus lower emissions, reduced energy consumption, better public transport services, increased overall accessibility, the re-use of infrastructure and previously developed land, a regeneration of existing urban areas and urban vitality, a higher quality of life and the preservation of green space.

The inclusion of universal design

8. NMH notes that there is no mention of universal design within the Plan Change documents. NMH advocates for the inclusion of universal design requirements for all houses.
9. 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.¹ 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'.²

10. 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.³
11. 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.⁴
12. 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 2012.⁵ 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
13. BRANZ research⁶ 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).⁷

¹ 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/>

² BRANZ. N.d. *Universal Design*. Accessed 14 November 2017
https://www.branz.co.nz/cms_display.php?sn=215&st=1

³ 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.

⁴ [Human Rights Commission :: Disabled people need to be key in Government's new public housing plans \(hrc.co.nz\)](http://hrc.co.nz)

⁵ 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.

⁶ [Study report SR263 Lifetime housing - the value case \(d39d3mj7qio96p.cloudfront.net\)](https://www.branz.co.nz/research/study-report-sr263-lifetime-housing-the-value-case-d39d3mj7qio96p.cloudfront.net)

⁷ [Universal design cost estimator | BRANZ](https://www.branz.co.nz/research/universal-design-cost-estimator)

Additionally, NMH believes that consideration should be given to requiring the incorporation of universal design standards within a certain proportion of large multi-unit developments. The following standards are used by Banyule City Council in Melbourne, Australia⁸:

- a) 10+ dwellings = minimum 20% of dwellings incorporate Liveable Housing Design Guidelines
- b) 3-9 dwellings = minimum of one dwelling incorporate Liveable Housing Design Guidelines
- c) 1-2 dwellings = voluntary incorporation of guidelines

Recommendation: that there is a requirement for universal design for all residential dwellings and commercial buildings in the development

Affordable Housing

14. Nelson City Council's Long Term Plan 2021-31 noted that the lack of affordable housing is one of the most significant challenges facing the Nelson region. Our housing market is consistently one of the least affordable in the country given that the household incomes (recorded for Nelson, Tasman, Marlborough and the West Coast combined) are 22.9% below the national median. This results in a higher level of unaffordability for both renters and property purchasers⁹.

When houses are unaffordable, then households need to make decisions about prioritising household expenditure in terms of housing payments (mortgages/rent), heating and food choices and this could contribute to poorer health outcomes. Increases in housing costs have a more severe impact on lower and fixed-income households as the proportion of income spent on rent or mortgages rises. Rates of home ownership are at their lowest since the early 1950s, reflecting decreased housing affordability and an absence of government funded programmes to support home ownership for modest income households. Māori and Pacific families are disproportionately affected, and as a consequence are most likely to live in inadequate, overcrowded, and unhealthy housing.¹⁰

⁸ Banyule City Council. N.d. *Liveable housing: Liveable Housing Design Guidelines*.

⁹ [Key Issue: Housing affordability and intensification | Long Term Plan 2021-2031 | Shape Nelson](#)

¹⁰ St John, S., Wynd, D. 2008. Left behind: how social and income inequalities damage New Zealand children. Auckland: Child Poverty Action Group. <http://www.cpag.org.nz/resources/publications/res1213939891.pdf>

15. Housing affordability has an impact on local businesses. The Nelson Regional Development Agency has reported that local business owners in the Nelson, Tasman and Marlborough regions have found it difficult to recruit staff from outside of the region because the area is considered too expensive to find suitable housing in.

Recommendation: all housing new builds should be price pointed to ensure that there is housing affordable to those on different income levels, not just to increase aggregate housing supply.¹¹ Also consideration of a shared ownership model may assist affordability as well as reducing isolation and increasing social connection

Inclusionary Zoning

16. NMH would like to see the adoption of inclusionary zoning into this development. Inclusionary zoning can offer opportunities to expand access to affordable housing and to encourage economic opportunity by reducing the proportion of family income spent on rent, building wealth through homeownership, and creating or preserving mixed-income neighbourhoods. Local governments should be able to use inclusionary zoning, which requires a portion to be retained for affordable housing, as rental or for-sale units, in return for benefits such as fast-tracked consenting, density bonuses, zoning variances, reduced mandatory fees, or other appropriate incentives. Inclusionary zoning is one of a range of tools to use where there is a mismatch between what the market is delivering and what the local community needs to house its workforce and under-served communities. Queenstown Lakes District Council, with developer support, piloted this policy to show how low-moderate income New Zealanders can get into safe, warm, affordable homes. The Council has combined this with shared home ownership and rental programmes¹². Research on this project found no significant variation in house price changes in Queenstown between houses neighbouring affordable properties and control groups and that the benefits clearly outweigh any risks. The planning provisions need to require retention of the affordable housing in perpetuity in the social sector, or similar.

NMH was pleased to see that Community Action Nelson and Habitat for Humanity has been engaged in the process and that three social housing providers could be interested in purchasing sections in the new development.

¹¹ [Where Does Housing Fit Into Budget 2021? | Scoop News](#)

¹² [Research finds that having an affordable home next door provides wider community benefits with no negative effects \(communityhousing.org.nz\)](#)

Recommendation: that inclusionary zoning is included that requires a portion to be retained for affordable housing, as rental or for-sale units

Typology:

17. Housing typology in New Zealand has traditionally been 3-4 bedroom houses. As our population ages and also becomes more diverse, there is growing demand for both 1-2 bedroom houses as well as larger 5 bedroom houses that meet the needs of multi-generational families however the building sector has not been able to meet this demand.

Recommendation: that there is a requirement for at least 30% of the development to be 1-2 bedroom houses built at universally designed standards.

Energy Efficiency

18. NMH would like to see the promotion of low-carbon buildings. Consideration could be given to using a Life Cycle Assessment to provide useful information to support eco-efficient and to reduce the climate impact of buildings.

Recommendation: that opportunity is given to developers to build at high energy efficient standards which include options to integrate solar power, rainwater harvesting and roof top gardens into the design.

Water

19. Freshwater values, including Te Mana o te Wai, need to be protected from inappropriate use and development and those water bodies that have degraded water quality need to be restored.

Flooding

20. NMH would like to see assurances that the flood hazard risks are adequately managed so people are not put at risk. This is especially important with Nelson's ageing population as older people may be physically, financially and emotionally less resilient dealing with the effects of hazards.

Stormwater

21. NMH supports the adoption of water sensitive design principles that mitigate the potential impacts from urbanisation whilst negating the existing degraded water quality impacts from current rural land use.

Rainwater Harvesting

22. NMH notes the importance of rainwater harvesting as the population grows and there are more frequent droughts as a result of climate change. NMH supports the use of rainwater for gardening, cleaning or toilet/laundry purposes. NMH does not support the use of rainwater for drinking water purposes unless there are no alternative reticulated option and only where suitable treatment is in place to render the water potable. NMH would like to see more explicit direction in the Plan of when rainwater harvesting can be used.

Wastewater

23. NMH note it is proposed to connect the subdivision to the Councils reticulated sewerage (and water) infrastructure. In relation to waste water, NMH could not see any documentation covering an assessment of impact on the Wakapuaka Wastewater Treatment Plant (WWTP) with regards to loading, treatment efficacy and routine maintenance associated with the significantly increased flows to the WTP.

Recommendation: that the assessment of the impact on the WTP are clearly articulated.

Planned and coordinated infrastructure services and transport

24. NMH is pleased to see that active transport routes will be established to link the Nelson City. This will enable people to easily navigate their community to access their daily needs. This is important especially for our ageing population who need to easily access services so that they can stay independent. NMH supports further work on creating a good selection of trails which are well suited to families and children, this would give youth (along with people of other ages) further opportunities to keep active.

Active forms of transport, such as walking and cycling, have a range of environmental benefits, including producing no air pollution, noise pollution or greenhouse gases.

Walking or cycling for transport helps integrate physical activity into everyday life. The health benefits of active transport include increased physical activity, improved mental health and reduced risk of diseases, such as cardiovascular diseases and cancer.

Recommendation: priority is given to walking and cycling modes on local roads. In the development of intersections in new subdivisions, cars would need to give way to active modes who are travelling straight. This design appears to be working successfully in Stoke near the Railway Reserve and aligns with Waka Kotahi proposal (March 2020) to give priority to straight travelling modes rather than turning traffic.

Recommendation: NMH would like to see requirements to be added for cycle parking. This would support cyclists to cycle.

It is critical that the new development is also accessible by public transport as this provides people with more transport options and supports mode shift.

Recommendation: there is a requirement for bus stops to be added into the street design

Recreation Areas

NMH is pleased to see that the Private Plan Change will include accessible, sustainable off-road tracks that provide enjoyable and safe recreation opportunities for all users as this is beneficial to people's mental and physical health

Conclusion

25. NMH thanks the Nelson City Council for the opportunity to comment on the Private Plan Change 28 – Maitahi Bayview.

26. NMH wishes to be heard.

Yours sincerely



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