

TE WAIORA



Nelson Marlborough
Health

**Submission on the
Environment
Committee's Resource
Management (Enabling
Housing Supply and
Other Matters)
Amendment Bill**

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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 Environment Committee's Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.
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 the purpose of the Proposed Bill to encourage medium density housing close to the town centres, providing this is supported by sustainable investment in infrastructure including supporting active and public transport.
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, contributing to improved community health and wellbeing outcomes.
5. Consideration also needs to be given to the importance of character within towns and cities. Character which can be dynamic and evolving is acknowledged as a key element in the Urban Design Protocols. New buildings and spaces need to be appropriate to their location and compliment the surrounding historic identity which builds community pride.¹ Moreover, it is essential that intensification is suitable to the surrounding infrastructure in terms of the three water networks, transport network and local community infrastructure in order not to exacerbate existing issues². Intensification needs to be planned in a coordinated way.
6. However, NMH considers that the Bill needs to go a step further in order to effectively provide a diversity and form of housing which caters for New Zealand's ageing population and/or those living with disabilities.

Housing that caters for older people and people with disabilities

7. Nelson Marlborough has a higher proportion of its population in the 65+ year age group than other New Zealand regions.¹ NMH believes that allowing the

¹ [New Zealand Urban Design Protocol \(environment.govt.nz\)](http://environment.govt.nz)

² [Wellington's water can't be kicked down the road any longer | Stuff.co.nz](http://stuff.co.nz)

intensification of brownfield locations, close to amenities and services, is necessary in providing for the ageing population to “age in place” (live at home into your older years). Older persons generally state a strong preference for living in their own home or non-institutional community settings.² Private homeownership has been associated with better health outcomes for older people as it alleviates the financial pressures and anxiety associated with high accommodation costs and minimal security of occupancy.³ Subsequently there is a growing demand for smaller houses and properties.⁴

8. Additionally, adults living with a disability are more likely to be living alone or with a partner only.⁵ NMH considers that an increase in the availability of smaller, easy care properties close to amenities and services may go towards providing greater independence and more housing choice.
9. However, in addition to encouraging smaller compact properties, housing also needs to be functional. Key factors include accessibility (ease of entering and navigating in and around the home) and adaptability (to cater for changing needs such as experiencing an injury or disability).
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.⁶
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.⁷
12. The Explanatory note of the Proposed Bill refers to the need for a wider variety of housing types. However, NMH considers that these high level provisions need to be underpinned and strengthened by policy and methods which support the implementation of universal design principles to ensure that housing is accessible and the opportunity to age in place or live independently is provided for.
13. Universal housing suits a family’s needs over a lifetime and can easily be adapted with minimal cost to meet individual and specialist needs. 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

14. 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 2012.¹⁰ 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
15. BRANZ research⁸ 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 \$16,990 on average.
16. The uptake of universal design principles is more critical given that the proposed Bill allows an increased building height up to three stories. Specific universal design features must be incorporated during the build phase of a two- or three-storey home, otherwise it is unlikely to be suitable for ageing residents and/or those living with a disability.
17. NMH considers that developers need to be provided financial incentives to incorporate universal design features within the smaller brownfield developments that the plan change is seeking. Incentives may include measures such as reducing development contributions and reserve financial contributions, structuring policy and rules to reduce uncertainty and costs for building consent processes, and/or allowing an increased building coverage for homes that incorporate universal design standards as done by Thames-Coromandel District Council.¹¹
18. 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, Australia¹²:
 - 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.

Relief sought

19. That Bill is strengthened by making the following recommended amendments:

*Schedule 3A MDRs to be incorporated by relevant territorial authorities, Part 2
Building Standards*

20. That consideration be given to requiring the incorporation of universal design standards within a certain proportion of large multi-unit developments.
21. That standards include the ability to use financial incentives for developers that incorporate universal design features within medium density housing developments e.g. reduced development contributions and reserve financial contributions, reduced uncertainties and costs for the building consent process, allowing an increased building coverage.

Conclusion

22. NMH thanks Environment Committee for the opportunity to comment on the Environment Committee's Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.
23. While NMH supports the intent of the Proposed Bill, it considers that it could go further in providing a diversity and form of housing which caters for New Zealand's ageing population and general preference to age in place, and those with a disability wanting to lead more independent lives.
24. NMH **does not wish to be heard** in support of its submission.

Yours sincerely



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References

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- ¹¹ Lifemark. 2016. *New initiative set to reduce cost of building consents (press release)*. Accessed 16 November <http://www.scoop.co.nz/stories/AK1608/S00105/new-initiative-set-to-reduce-cost-of-building-consents.htm>
- ¹² Banyule City Council. N.d. *Liveable housing: Liveable Housing Design Guidelines*. Accessed 16 November 2017