

Te Tuapapa Kuru Kainga
(Ministry of Housing and Urban
Development)'s
Government Policy
Statement on Housing
and Urban Development
30 July 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 Te Tuapapa Kuru Kainga (Ministry of Housing and Urban Development) consultation on the Government Policy Statement on Housing and Urban Development (GPS-HUD).
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. This submission sets out particular matters of interest and concern to NMH.

General Comments

4. NMH strongly supports the introduction of the GPS-HUD. NMH commends Te Tuapapa Kuru Kainga on the decision to focus on the right to a "healthy, secure, affordable" home, noting that a home is more than a building and is a place which can nurture people. Poor housing can exacerbate health issues and the lack of access to healthy, safe and affordable housing contributes to inter-generational, socio-economic and ethnic inequities in Aotearoa New Zealand.
5. NMH applauds Te Tuapapa Kuru Kainga in putting equity and the Te Tiriti o Waitangi at the heart of the document.
6. It is hoped that this GPS-HUD will be used by a broad range of government agencies in order to enable more people to have decent homes within Aotearoa.
7. NMH is pleased to see that the GPS-HUD includes actions that will mitigate and adapt to the effects of climate change by reducing emissions from buildings during their construction and operation as well as prioritising public transport and active modes to support new housing development in appropriate areas, reduce emissions, improve health and create well-functioning urban environments.

Specific Comments

8. *Question 1 & 2: Do you agree with this vision statement? Is there anything you would like to add?*

Yes. NMH agrees with the vision statement but notes that accessibility to all people at any stage of life has not been included. New Zealand research has shown that the current housing stock struggles to function adequately for people

with people with functional impairments and tends to be costly to adapt. The poor functionality and accessibility of New Zealand's housing stock contributes to the process by which individuals' limitations are transformed into a disability. This has resulted in

- a. People being displaced from private homes into residential facilities
- b. Costly dwelling modifications which frequently under-deliver functionality, are unaffordable for individuals, and need to be rationed because of constraints on public funding with a consequent gap between need and supply
- c. Requirements for significant in-home support provided and/or funded by families or contacted with public funding

As noted in Kainga Ora's *Accessibility Policy*: "A one-size-fits-all approach to building homes has never been ideal, and this approach is becoming even less so as New Zealand's population becomes older, experiences more instances of short- or long-term illness, injury or disability and is more culturally and ethnically diverse than it has ever been."¹

Universal design is about creating homes that are safe, convenient and accessible regardless of physical ability or life stage. Homes are designed in such a way that they are accessible to everyone – from young children to older adults. NMH recommends that Universal Design is added to the Vision Statement.

9. *Question 3 & 4: Do you agree that "Thriving Communities" is an important outcome? Is there anything you would like to add?*

Yes. NMH agrees with this outcome and is pleased to see that Te Tuapapa Kuru Kainga has taken a place-making approach to urban planning, focusing not just on the bricks and mortar elements of housing but looking at the broader environment where people live.

In addition, NMH supports the integration of climate policies within the GPS-HUD that require reduced emissions, restoring ecosystem health and preparing for the impacts of climate change.

NMH also supports increasing access to papakainga housing.

¹ [Kainga-Ora-Accessibility-Policy-PDF-FINAL-15.11.19.pdf \(kaingaora.govt.nz\)](#)

10. Question 5 & 6: Do you agree that "Wellbeing through housing" is an important outcome? Is there anything you would like to add?

Yes. NMH agrees with the breadth of topics covered including the reduction of homelessness, increase supply and range of housing typologies to adapt to people regardless of ability or age, and increasing overall housing quality.

From a public health perspective, there are positive health effects from a healthy home and then there are neighbourhood level effects which go beyond the healthiness of the physical house. These are the features that are independent of individual level risk factors e.g. air quality, noise exposure, waste disposal and amenities such as footpaths and green spaces. From a health perspective we must address both levels.

11. The availability of healthy, affordable housing of people is a major concern for NMH. People who live in warmer drier homes tend to be healthier, with fewer GP and hospital visits and fewer days away from work due to illness. Tenure uncertainty, unaffordable housing related costs, dilapidation and cold damp conditions have all been found to adversely affect health. There is an increasing number of older people in rental accommodation. Poor housing exacerbates existing health conditions and heighten 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.²

Badly ventilated and poorly heated homes reduce the occupants' comfort and can adversely affect health. An analysis conducted by the World Health Organisation found that those over 65 years of age showed increased respiratory problems when living in cold dwellings in winter and children 0 to 17 years of age showed twice the prevalence of respiratory problems in poorly heated homes.³ Energy efficient homes result in reduced energy costs, which is important for low income households on fixed incomes, as well as helping meet the Government's sustainability objectives.

In addition, consideration needs to be given to injuries that occur in the home, and ensuring that people are able to live safely. This includes reducing people's

² 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

³ Community and Public Health, (2013) *Fuel Poverty and Home Heating*, Canterbury District Health Board
<http://www.healthychristchurch.org.nz/media/16229/fuelpoverty.pdf>

exposure to the likes of lead or volatile organic compounds, and minimising pest infestations. These are also dimensions of healthy homes.

12. Question 7 & 8: Do you agree that "Partnering for Maori housing and urban solutions" is an important outcome? Is there anything you would like to add?

Yes. NMH agrees with the approach taken. NMH supports the development of culturally appropriate housing e.g. papakainga and supports the incorporation of Maori heritage and design elements into new urban developments.

Question 9 & 10: Do you agree that "An adaptive and responsive system" is an important outcome? Is there anything you would like to add?

Yes. NMH agrees with the approach taken. It would also be useful within this section to broaden the scope to include direct reference to sea level rise and the protection of highly productive land.

Given the proximity of most urban centres to the coast, it is important that the GPS-HUD ensures that new housing developments are built away from areas vulnerable to sea level rise to ensure future generations are not exposed to avoidable risk.

Moreover, the importance of protecting highly productive land for food production should also be articulated in the GPS-HUD. Enabling local food production and markets means that communities have easy access for fresh food which is important for nutrition and overall health, and reduces greenhouse gas emissions. As populations increase, there will be further demand for food which can increase prices resulting in the population's ability to access cheap food. Therefore it is important that highly productive land is protected from urban encroachment.

13. Question 11: Are there any other outcomes that you think would help us achieve our vision?

No.

14. Question 12 & 13: Do you think more affordable homes should be an area of focus? What else should we consider when ensuring that more affordable houses are being built?

Yes, NMH agrees that affordable homes should be an area of focus. Housing affordability is a social determinant of health. 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.⁴ In addition, housing is a significant part of family wealth in New Zealand with home-ownership proving a means to pass on resources between generations⁵.

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 purchasers⁶.

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.

As previously noted in this submission, it is vitally important that affordable housing is not built on highly productive land. Any policy regarding greenfield development must specifically protect and preserve highly productive land for food production. In addition, affordable housing should not be placed in areas susceptible to sea level rise.

The wording relating to Question 12 states that *"We need to create a housing market that is competitive and affordable for renters and homeowners"*.

Competitiveness and affordable could be considered as mutually exclusive terms. NMH challenges the inclusion of the term "competitive" as the purpose of this document is to re-establish housing's primary role as a home rather than a financial asset. The promotion of "competitiveness" runs contrary to that. NMH recommends the term competitive is removed from this section.

⁴ 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>

⁵ <https://www.stats.govt.nz/assets/Reports/Changes-in-home-ownership-patterns-1986-2013-Focus-on-Maori-and-Pacific-people/changes-home-ownership-maori-pacific-1986-2013.pdf>

⁶ Key Issue: Housing affordability and intensification | Long Term Plan 2021-2031 | Shape Nelson

15. Question 14: What actions do you think Government, yourself or others could take to ensure that more affordable houses are being built?

NMH would like to see support for expansion of inclusionary zoning into more local government areas in New Zealand, as part of the Natural and Built Environments Act and the Strategic Planning Act, alongside appropriate evaluation of such initiatives to see how they work in the New Zealand context. 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 programmes⁷. 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 recommends that this approach is expanded to other jurisdictions and evaluated to understand its potential role in addressing our housing crisis.

16. Question 15 & 16: Do you think the "provision of homes that meet people's needs" should be an area of focus? What else should we consider when ensuring that every New Zealander has an affordable, safe, warm, dry and accessible home to call their own?

Yes, NMH agrees with the argument outlined in the discussion document. NMH would also like to acknowledge that the right to adequate housing has been

⁷ [Research finds that having an affordable home next door provides wider community benefits with no negative effects \(communityhousing.org.nz\)](https://communityhousing.org.nz)

recognised by the United Nations as a fundamental human right because it is integral to core human rights values such as dignity, equality, inclusion, wellbeing, security of the person and public participation.⁸ NMH notes that the GPS-HUD would benefit by including reference to the United Nation's Housing Principles.

The importance of having an affordable, safe, warm, dry accessible home has been well-established. However the practical application of assessing the standard of homes is not in place although there a variety of warmer homes schemes available in pockets in different areas of New Zealand. It would be valuable for people (home owners and renters) to have access to independent assessors that can give free or cheap advice. As the Sustainability Trust has acknowledged: *"At the moment, there's no legal obligation for an independent assessment of the home. There should be "certified assessors" to complete those assessments."*⁹ In addition, renters and landlords should also have access to these assessments to ensure that rental properties are meeting the new Healthy Home standards.

In addition, there needs to be requirements for building developments to build a minimum number of units/houses that meet universal design principles. In order to meet the strategic goal of housing catering for New Zealand's changing demographic profile /increasing ageing population, NMH considers that developers need to be provided with financial incentives to incorporate universal design features within the smaller brownfield developments. 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.¹⁰

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, Australia¹¹:

⁸ [G1935390.pdf \(un.org\)](#)

⁹ [The gulf between a healthy home and a house that complies with Healthy Homes standards | Stuff.co.nz](#)

¹⁰ Lifemark. 2016. *New initiative set to reduce cost of building consents (press release).*

<http://www.scoop.co.nz/stories/AK1608/S00105/new-initiative-set-to-reduce-cost-of-building-consents.htm>

¹¹ Banyule City Council. N.d. *Liveable housing: Liveable Housing Design Guidelines.*

- 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

17. *Question 17: What actions do you think Government, yourself or others could take to ensure that every New Zealander has an affordable, safe, warm, dry and accessible home to call their own?*

NMH support the proposed actions outlined on page 46 that will provide a range of housing opportunities for people. NMH is pleased to see that "Building for Climate Change" programme has been included.

Warmer and drier homes: NMH is currently a partner in the Warmer Kiwi Homes for Nelson Marlborough which offers grants to the cost of getting insulation or heaters installed. This programme has been successful in warming about 2500 homes since the initiative started in 2014. It would benefit by extending the eligibility criteria so that more people can access this grant.

Accessible Homes: NMH is supportive of ACC to make homes accessible under certain criteria, however retrofitting is a costly exercise. The housing stock of New Zealand would greatly be improved if a larger proportion of houses were built to universal designs. This is outlined earlier in the submission.

NMH supports the proposed action (page 46) "support the increasing adoption of accessible building principles" but recommends that it is strengthened to include a requirement to mandate accessible building principles. Lack of accessible housing is major problem which will take decades to rectify therefore action needs to occur now.

Typology: 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. Consideration needs to be given by local and central government on providing mechanisms that enable regions to respond faster to enable a wider proportion of housing typologies to be built.

Rental Tenure: It has been well-established that the numbers of home owners is decreasing. There will be a growing number of older people renting in the future. Recent changes have provided more security for renters, but there is more that

could be done. A working paper on the Tenure Security for Older Tenants stated where tenure is consistently unaffordable, housing conditions are poor, or the tenancy itself is unstable, the already fragile situation of older tenants is exacerbated. In contrast, where there is tenure stability, ageing in place may be supported, as tenants can:

- a. Establish and maintain supports and connections with their community and services such as in-home care, health services and shops.
- b. Manage housing and living costs, as rental costs are more affordable and predictable.
- c. Reduce expense associated with frequent moving, which in itself can create or contribute to financial hardship.
- d. Reduce stress associated with frequent moving.
- e. Live in housing that is maintained for their comfort and safety.¹²

NMH has advocated in its submission to the Office of Seniors that the recommendations¹³ of the Population Ageing Technical Advisory Group to include a series of initiatives that support the ageing in place of tenants are included into a national strategy. The following recommendations may also be applicable to local councils. These include:

- f. Education for landlords and property managers about:
 - i. Statutory obligations
 - ii. Identifying and managing behavioural signs in older people that can lead to eviction.
- g. Accessible advice and support for tenants with housing problems and needing legal advice
- h. Provision of home care and other services to help older tenants to age in place.
- i. Increasing the percentage of low cost rental dwellings for seniors in the housing stock
- j. Greater attention to the safety and security needs of older tenants, including regular checks on older tenants.

¹²James, B. & Saville-Smith, N. (2016) *Tenure Security for Older Tenants: A country review of policy, programmes and regulation*. SmartGrowth and the Population Ageing Technical Advisory Group (PATAG) Western Bay of Plenty Sub-region pg 2
<https://www.smartgrowthbop.org.nz/media/1663/tenure-securityoverview-final-july.pdf>

¹³ Ibid, pg. 10

- k. Appropriate placement of older tenants in terms of neighbours, transport and facilities.
- l. Facilitation of moving to more suitable dwellings for those tenants who want or need to move – by providing modern, customised and higher standard properties in the right location that will encourage people to move.
- m. Addressing housing conditions affecting older tenants' health.
- n. Inter-agency sharing of information and resources to improve support for older tenants.

Affordability: Housing affordability, as noted earlier, is a key concern across the country. NMH notes that this consultation document has not discussed at any length the role of central government in regional development. Upcoming public sector reforms will lead to major changes in service delivery across the country. These changes will affect a number of government employees. Consideration could be given to strengthening the role that regional centres play rather than concentrating a large number of jobs only in major cities which could exacerbate existing housing markets. Taking a regional approach such as using minor regional hubs for key government services in places such as Blenheim would bring more employment to the regions benefiting local economies as well as communities.

The accommodation supplement does not address issues of crowding, poor quality housing and homelessness.¹⁴ Increased funding to support progressive home ownership would allow more low to modest income families a pathway out of rentals and into owner occupation providing security and control over their lives. In Nelson Marlborough, the programme is supported through Habitat for Humanity.

In terms of affordability, all housing new builds should be price pointed to ensure that there is housing affordable to those on different income levels within a region, not just to increase aggregate housing supply.¹⁵ Also consideration of a

¹⁴ Saville-Smith, K. and Mitchell, I. (December2020) . *Accommodation Supplement High Expenditure, Low efficacy*. Building Better Homes,Towns and Cities National Science Challenge

¹⁵ [Where Does Housing Fit Into Budget 2021? | Scoop News](#)

shared ownership model may assist affordability as well as reducing isolation and increasing social connection.

18. Question 18 & 19: Do you think "supporting resilient, sustainable, inclusive and prosperous communities" should be an area of focus? What else should we consider when working to support resilient, sustainable, inclusive and prosperous communities"?

Yes, NMH strongly supports this section. NMH is pleased to see that urban development and sustainability have a clear and articulated focus. NMH strongly supports the development of public transport-oriented, accessible and safe built environments. It is important to acknowledge that additional investment in regional bus services will be required and previous Budget rounds have resulted in the major cities receiving the bulk of funding. This model needs to be adjusted to support regional centres, many of which have had only basic public transport systems.

NMH notes there has been no mention of the protection of highly productive land within this section and this is an oversight. It is critically important that the provision of housing does not come at the detriment of the natural environment. As stated earlier in the submission, there is a need to protect highly productive land around urban centres and this must be acknowledged within the GPS-HUD.

19. Question 20: What actions do you think Government, yourself or others could take to support resilient, sustainable, inclusive and prosperous communities"?

NMH endorses all the actions that are proposed on page 49.

NMH continues to advocate for sustainable, inclusive communities, and we continue to advocate for additional funding for active transport modes. NMH is represented on the Tasman Regional Land Transport Committee, and we would like to see all Regional Land Transport Committees have public health representation.

20. Question 21 & 22: Do you think "investment in Maori-driven housing and urban solutions" should be an area of focus? What else should we consider when enabling iwi and Maori-driven housing and urban solutions?

Yes, NMH supports this approach

21. Question 23: What actions do you think Government, yourself or others could take to enable iwi and Maori-driven housing and urban solutions?

NMH strongly supports all the Actions identified on page 53.

NMH strongly supports the work that the Government is currently doing in relation to increasing the number and capacity of Maori housing providers, as well as supporting iwi and Maori to build their capacity to deliver housing solutions. This has been a policy gap for many years and it is pleasing to see that is being addressed now.

NMH notes that the document focuses on ensuring Maori are partnering in the design and implementation of housing solutions however the GPS-HUD remains relatively silent on Maori governance and leadership which would fit with tinorangitiritanga and a by Maori for Maori approach.

22. Question 24 & 25: Do you think "prevention and reduction of homelessness" should be an area of focus? What else should we consider when working to prevent and reduce homelessness?

Yes, NMH supports this approach.

There needs to be recognition of the diverse needs of people living with homelessness. Some may have primary affordability concerns, others have complex health and social needs including psycho-social and behavioural health needs. The types of housing including supported living arrangements needs to be cognisant of the multiplicity of reasons for homelessness. There also needs to be better coordination and collaboration between agencies to address housing as part of a complex health and social picture.

The GPS-HUD needs to ensure that there is a stepped plan for temporary accommodation for people when eviction is the only option so they do not find themselves homeless which can exacerbate mental stress.

The GPS-HUD also do not make any specific reference to migrants. Some migrants have been exposed to exploitation therefore it would valuable to ensure that there is the right to housing without discrimination for all migrants regardless of legal status and documentation.

23. Question 26: What actions do you think Government, yourself or others could take to prevent and reduce homelessness?

NMH has acknowledges that homelessness is a key concern for the Nelson Marlborough region. This is why it was identified as a work stream for the Te Tau Ihu Top of the South Impact Forum, this is a collaborative group made up of representation from government agencies in the region. This workstream contains a series of actions which are being undertaken locally to address homelessness.

One area of major concern for NMH is the lack of support for people transitioning from acute mental health and addiction inpatient units to housing. NMH is pleased to see that the GPS-HUD has included this as an action area. It can often be difficult for those with mental health issues to transition smoothly to living independently in the community, and tenancy problems can occur resulting in people being made homeless. Additional support is welcomed in this area.

24. Question 27 & 28: Do you think the "re-establishment of housing primary role as a home rather than a financial asset" should be an area of focus? What else should we consider when working to reduce speculative investment, making home ownership more accessible and supporting a more productive, resilient and inclusive economy?

Yes, NMH strongly supports this approach.

25. Question 29: What actions do you think Government, yourself or others could take to reduce speculative investment, making home ownership more accessible and supporting a more productive, resilient and inclusive economy?

No comment

26. Question 30 Do you have any feedback on the proposed approach to implementing the GPS-HUD

No comment

27. Is there anything else you'd like to tell us about what we are proposing to shape a better housing and urban future for Aotearoa New Zealand.

28. NMH notes the section on "Housing and urban development focus areas" (pages 72-73) that Nelson Marlborough has not been identified as an area of concern. Our area is facing housing shortages and we require both place-based partnerships and well as further public housing. 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 2019-2020¹⁶. 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 week¹⁷. The impact of this housing crisis in our 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 our growing tide of residents struggling to keep a

¹⁶ [Nelson's housing stock halved in 2020 continuing 'long-term trend' | Stuff.co.nz](https://www.stuff.co.nz/nelson-tasman/news/121444444-nelsons-housing-stock-halved-in-2020-continuing-long-term-trend)

¹⁷ [Storage squeeze reflects housing shortage as people wait to buy or rent | Stuff.co.nz](https://www.stuff.co.nz/nelson-tasman/news/121444444-storage-squeeze-reflects-housing-shortage-as-people-wait-to-buy-or-rent)

roof over their heads¹⁸. NMH recommends that Te Tuapapa Kuru Kainga and Kainga Ora prioritise effort and investment into Nelson, Tasman and Marlborough.

¹⁸ [Key Issue: Housing affordability and intensification | Long Term Plan 2021-2031 | Shape Nelson](#)

Conclusion

29.NMH thanks the Te Tuapapa Kuru Kainga for the opportunity to comment on the Government Policy Statement on Housing and Urban Development.

Yours sincerely

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