
Submission on Napier City Proposed District Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Napier City Council - Planning Unit

Date received: 15/12/2023

Submission Reference Number #:181

This is a submission on the following proposed plan (the **proposal**): Napier City Proposed District Plan

Submitter:

Ben Hasselman

Address for service:

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Email: ben@lifemark.co.nz

Attachments:

Napier Council Proposed District Plan - Lifemark® Submission.pdf

I wish to be heard: Yes

I am willing to present a joint case: No

Could you gain an advantage in trade competition in making this submission?

- **N/A**

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- **Yes**

Submission points

Point 181.1

Section: MRZ - Medium Density Residential Zone

Sub-section: MRZ - Medium Density Residential

Sentiment: Amend

Submission:

Universal Design:

Universal Design is a people-centred approach to design aimed to deliver inclusive built environments and products that support high levels of performance and usability for the widest range of people. The benefits of Universal Design are undisputable and include enabling independence, social participation and delivering safer and more liveable homes and communities for everyone, regardless of age or ability. In New Zealand, Universal Design is currently an “above the building code” approach to housing design.

See attached doc

Relief sought

see attached doc

Point 181.2

Section: MRZ - Medium Density Residential Zone

Sub-section: Objectives

Provision:

MRZ-O1: Housing supply and diversity

Land is used efficiently for medium-density residential living that increases housing supply and choice.

Relates to GRZ-11

Sentiment: Amend

Submission:

Napier City Proposed District Plan – Medium and High Density Residential Zones

Napier City Council has the opportunity through ‘Proposed District Plan’ to become more actively involved in ensuring that housing stock meets the populations needs, especially considering the requirements for the provision of housing that will accommodate people throughout every age and stage of their life. Currently there is a shortage of housing that can accommodate those with access needs, and this will be intensified through allowing two- and three-story walk up residential builds, apartments and town housing being consented without the requirement for Universal Design or any reference to accessibility.

Medium Density Residential Zones – Topic Summary Document

“Housing demand has increased significantly across New

Zealand, including in Napier,

and we need to provide a range of housing types to meet the needs of our communities.”

High Density Residential Zones – Topic Summary Document

“Housing demand has increased significantly across New Zealand, including in Napier, and we need to provide a range of housing types to meet the needs of our communities. Enabling high density development in close proximity to the City Centre and to Taradale Town Centre provides an opportunity for vibrant, urban terraced and apartment living opportunities in Napier.”

Neither document refers to the accessibility / usability / Universal Design of the housing which is leaving a large gap in providing for the needs of our community. We have seen “the market” and social housing providers consistently fail to meet any significant levels of accessibility or Universal Design which results in housing stock that is not adequate for the community needs.

The recent discussion document for the new Ageing Strategy noted that a limited supply of accessible housing and difficulty modifying existing properties may cause problems for an ageing population (Office for Seniors, 2018, pp. 15, 25-26). It is also important to note that inaccessible housing can become unsafe for many people as they age and result in injuries (Keall, 2017).

In the 2013 Disability Survey, 17% of people with physical impairments, or 107,440 people, and 16% of people with vision impairments, or 26,880 people, had an unmet need for housing modifications (Statistics New Zealand, 2017).

Figure 2 - Issues raised in workshops with the community, providers/agencies, and advisory groups, 2017



Figure 3 - Issues raised by older people in the community workshops, 2017



Above Figure 2 and 3 taken from Napier Positive Ageing Strategy – December 2019 Note in both figures 2 and 3 the word ACCESSIBLE which is a major issue identified by

community, providers/agencies, advisory groups and older people. Universal Design is the answer.

With an ageing population, the number of people who need accessible housing is rapidly growing. Previous research has found

strong evidence of a significant undersupply of accessible private homes and social housing (Saville-Smith, James, Fraser, Ryan, & Travaglia, 2007, pp. 50-53).

Given the growing number of people who will need housing modifications and the difficulty and expense of making homes accessible once built, we need more housing built to Universal Design standards. Research by BRANZ has shown that it is considerably cheaper to build homes with Universal Design features, than to retrofit existing houses. Universal Design means developing housing that works for all people of all abilities at any stage of their life. (BRANZ).

It is important to recognise the ageing population of the Napier District and the fact people prefer to age in their own homes rather than ageing out, therefore the adoption of a strategy to incentivise the use of Universal Design standards in future builds would make a significant contribution to the future of the district.

Relief sought

Recommendation

Transformational change is not easy. Within 30 years, five out of every six houses we will ever need will have already been built. With currently just 5% of all homes 'accessible' our targets from now need to be bold to ensure the housing we develop meets our future population needs.

Regulations and incentives are the main tools to drive change. The regulatory approach requires enforcement of regulation. Guidance documents while helpful do not achieve the desired outcome.

We encourage Napier City Council to develop and adopt an initiative that will provide an incentive to designers and developers to increase the number of Universally Designed/Lifemark® homes being built throughout the district. Lifemark® has successfully worked in partnership with other councils to provide accessible homes through the utilisation of the star rating system and can support Napier City Council with exploring options that would be beneficial for the community.

Incentives create opportunities for change. Incentives work and are becoming more commonplace. The challenge is to identify how to use the incentive tools available, such as operating supplements, to reinforce the outcomes that are desired.

In 2016, Thames Coromandel District Council incentivised private developments to build to a Universal Design standard (Lifemark 3 star) by offering increased site coverage. Today nearly 40% of all new builds use this incentive with 80% of homes being built, voluntarily, above the minimum.

In 2018, Hauraki District Council incentivised private developers to build secondary dwellings to a Universal Design standard (Lifemark 3 star).

In 2021, Hamilton City Council incentivised private developers to build inner city developments to a Universal Design standard (Lifemark 3) through lower development fee contributions.

In 2022, Wellington City Council has taken a bold innovative approach and established a fund, to support new developments built to a future focussed accessible and environmental standard. This innovative incentive supports Wellingtons goals to be an inclusive, people-friendly place to live.

These are future focussed policies that support housing strategies which are aligned to the United Nations Human Rights approach to provide adequate housing and establish a vision where all people are well housed. Lifemark® in conjunction with Napier City Council can explore initiatives to increase the number of Universally Designed homes built in Hastings to meet the needs of the community.

Point 181.3

Section: HRZ - High Density Residential Zone

Sub-section: Objectives

Provision:

HRZ-O1: Housing supply and diversity

Land that has good accessibility by existing or planned active or public transport to a range of commercial activities, public open

space, and community services, is efficiently used for high-density urban living that increases housing supply and choice.

Relates to GRZ-11

Sentiment: Amend

Submission:

Napier City Proposed District Plan – Medium and High Density Residential Zones

Napier City Council has the opportunity through 'Proposed District Plan' to become more actively involved in ensuring that housing stock meets the population's needs, especially considering the requirements for the provision of housing that will accommodate people throughout every age and stage of their life. Currently there is a shortage of housing that can accommodate those with access needs, and this will be intensified through allowing two- and three-story walk up residential builds, apartments and town housing being consented without the requirement for Universal Design or any reference to accessibility.

Medium Density Residential Zones – Topic Summary Document

“Housing demand has increased significantly across New Zealand, including in Napier,

and we need to provide a range of housing types to meet the needs of our communities.”

High Density Residential Zones – Topic Summary Document

“Housing demand has increased significantly across New Zealand, including in Napier, and we need to provide a range of housing types to meet the needs of our communities. Enabling high density development in close proximity to the City Centre and to Taradale Town Centre provides an opportunity for vibrant, urban terraced and apartment living opportunities in Napier.”

Neither document refers to the accessibility / usability / Universal Design of the housing which is leaving a large gap in providing for the needs of our community. We have seen “the market” and social housing providers consistently fail to meet any significant levels of accessibility or Universal Design which results in housing stock that is not adequate for the community needs.

The recent discussion document for the new Ageing Strategy noted that a limited supply of accessible housing and difficulty modifying existing properties may cause problems for an ageing population (Office for Seniors, 2018, pp. 15, 25-26). It is also important to note that inaccessible housing can become unsafe for many people as they age and result in injuries (Keall, 2017).

In the 2013 Disability Survey, 17% of people with physical impairments, or 107,440 people, and 16% of people with vision impairments, or 26,880 people, had an unmet need for housing modifications (Statistics New Zealand, 2017).

Figure 2 - Issues raised in workshops with the community, providers/agencies, and advisory groups, 2017

Figure 3 - Issues raised by older people in the community workshops, 2017

Community support services



Above Figure 2 and 3 taken from Napier Positive Ageing Strategy – December 2019 Note in both figures 2 and 3 the word ACCESSIBLE which is a major issue identified by

community, providers/agencies, advisory groups and older people. Universal Design is the answer.

With an ageing population, the number of people who need accessible housing is rapidly growing. Previous research has found strong evidence of a significant undersupply of accessible private homes and social housing (Saville-Smith, James, Fraser, Ryan, & Travaglia, 2007, pp. 50-53).

Given the growing number of people who will need housing modifications and the difficulty and expense of making homes accessible once built, we need more housing built to Universal Design standards. Research by BRANZ has shown that it is considerably cheaper to build homes with Universal Design features, than to retrofit existing houses. Universal Design means developing housing that works for all people of all abilities at any stage of their life. (BRANZ).

It is important to recognise the ageing population of the Napier District and the fact people prefer to age in their own homes rather than ageing out, therefore the adoption of a strategy to incentivise the use of Universal Design standards in future builds would make a significant contribution to the future of the district.

Relief sought

Recommendation

Transformational change is not easy. Within 30 years, five out of every six houses we will ever need will have already been built. With currently just 5% of all homes ‘accessible’ our targets from now need to be bold to ensure the housing we develop meets our future population needs.

Regulations and incentives are the main tools to drive change. The regulatory approach requires enforcement of regulation. Guidance documents while helpful do not achieve the desired outcome.

We encourage Napier City Council to develop and adopt an initiative that will provide an incentive to designers and developers to increase the number of Universally Designed/Lifemark® homes being built throughout the district. Lifemark® has successfully worked in partnership with other councils to provide accessible homes through the utilisation of the star rating system and can support Napier City Council with exploring options that would be beneficial for the community.

Incentives create opportunities for change. Incentives work and are becoming more commonplace. The challenge is to identify how to use the incentive tools available, such as operating supplements, to reinforce the outcomes that are desired.

In 2016, Thames Coromandel District Council incentivised private developments to build to a Universal Design standard (Lifemark 3 star) by offering increased site coverage. Today nearly 40% of all new builds use this incentive with 80% of homes being built, voluntarily, above the minimum.

In 2018, Hauraki District Council incentivised private developers to build secondary dwellings to a Universal Design standard (Lifemark 3 star).

In 2021, Hamilton City Council incentivised private developers to build inner city developments to a Universal Design standard (Lifemark 3) through lower development fee contributions.

In 2022, Wellington City Council has taken a bold innovative approach and established a fund, to support new developments built to a future focussed accessible and environmental standard. This innovative incentive supports Wellington's goals to be an inclusive, people-friendly place to live.

These are future focussed policies that support housing strategies which are aligned to the United Nations Human Rights approach to provide adequate housing and establish a vision where all people are well housed. Lifemark® in conjunction with Napier City Council can explore initiatives to increase the number of Universally Designed homes built in Hastings to meet the needs of the community.



Napier City Proposed District Plan

Introduction:

Firstly, I would like to thank you for the opportunity to provide feedback on the Napier City proposed district plan. My name is Ben Hasselman and I represent Lifemark® in my role as an Assessor. I advocate for better access by striving for inclusive, accessible communities with a focus on Universal Design (UD) in residential housing.

Lifemark®, a division of CCS Disability Action, developed a globally recognised process to ensure homes could be designed to be safe and accessible and provide better living options both now and in the future. This voluntary process, in use across New Zealand since 2012, incorporates design criteria based in Universal Design Best Practice with an independent review of proposed building plans and assurance delivered with a performance rating system.

Universal Design:

Universal Design is a people-centred approach to design aimed to deliver inclusive built environments and products that support high levels of performance and usability for the widest range of people. The benefits of Universal Design are undisputable and include enabling independence, social participation and delivering safer and more liveable homes and communities for everyone, regardless of age or ability. In New Zealand, Universal Design is currently an “above the building code” approach to housing design.

Napier City Proposed District Plan – Medium and High Density Residential Zones

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Thank you

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TE HUNGA HAUĀ MAURI MŌ NGĀ TĀNGATA KATOA



Bibliography

Keall, P. (2017, March 21). *Evidence supports nationwide roll-out of home safety measures*. Retrieved from University of Otago: <https://www.otago.ac.nz/news/news/otago639044.html>

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Napier Positive Ageing Strategy

https://issuu.com/napiercitycouncil/docs/2020-03_final_positive_ageing_strategy_-_backgroun?fr=sM2UxOTU4Njg1NQ