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**The Royal Australasian College of
Physicians' submission to the
Environment Select Committee**

Urban Development Bill
Huitanguru 2020

Introduction

The Royal Australasian College of Physicians (RACP) welcomes the opportunity to submit feedback to the Environment Select Committee on the Urban Development Bill.

The RACP works across more than 40 medical specialties to educate, innovate and advocate for excellence in health and medical care. Working with our senior members, the RACP trains the next generation of specialists, while playing a lead role in developing world best practice models of care. We also draw on the skills of our members, to develop policies that promote a healthier society. By working together, our members advance the interest of our profession, our patients and the broader community.

Key Points

- The RACP is strongly supportive of action that will alleviate housing pressures in Aotearoa New Zealand.
- While the Urban Development Bill identifies the aspirations of Māori in housing and urban development, and includes protections for Māori interests in land, we are concerned that it may not sufficiently regard Māori interests. This includes allowing for the expression of tino rangatiratanga in the context of development in Aotearoa New Zealand.
- Gentrification is a key concern in developments enabled by the Urban Development Bill. It must be avoided as part of the mandate given to Kāinga Ora, so as to prevent harm from being done to vulnerable communities.
- Accessibility, both to public transport and to developments themselves is a key concern that must be ensured in any developments undertaken by Kāinga Ora as a result of the Urban Development Bill.

Background

The RACP believes that the lack of appropriate, affordable, and healthy housing is a key issue in Aotearoa New Zealand. We have advocated for a number of years as part of our Making it the Norm campaign for the importance of healthy housing to the achievement of health equity in Aotearoa New Zealand¹. Recently, we released our 2019 report card on the progress made on healthy housing since the 2017 election². This report card found that some progress has been made, but that there is significant room for improvement. With over 12,000 people on the waitlist for public housing, the people of Aotearoa New Zealand are struggling to find healthy, affordable and appropriate homes in which to live. As such, development that will relieve housing pressures is a key concern for the RACP.

¹ The Royal Australasian College of Physicians. Make it the Norm: Equity through the social determinants of health. [Internet]. Sydney: The Royal Australasian College of Physicians; 2017. Available from: <https://www.racp.edu.au/docs/default-source/default-document-library/make-it-the-norm-pres-letter.pdf?sfvrsn=4>. Accessed 5 February 2020

² The Royal Australasian College of Physicians. #MakingItTheNorm report card – Healthy housing. [Internet]. Sydney: The Royal Australasian College of Physicians; 2017. Available from: https://www.racp.edu.au/docs/default-source/default-document-library/policy-and-advocacy/racp-nz-making-it-the-norm-report-card-healthy-housing.pdf?sfvrsn=cf0de21a_0. Accessed 5 February 2020

Impact of Housing on Health in Aotearoa New Zealand

Aotearoa New Zealand has both a poor standard of housing, and poor housing affordability. The OECD found in 2017 that around 30 per cent of homes in Aotearoa New Zealand were poorly insulated, and that half of all renters report problems with dampness or mould³. It is likely that as a result of legislative changes put in place since the report, that this has improved somewhat; however, indoor environmental quality remains a significant problem for many whānau, as evidenced by recent news articles detailing similar issues⁴.

The lack of available properties for rent also forces whānau to take on lease agreements for dwellings which are not of suitable quality, nor protect health and wellbeing. Properties like this have a number of detrimental effects on the population, especially affecting vulnerable groups such as children, Māori, and Pasifika people.

This is prominently shown by a 2013 study examining the admission of children to Wellington Hospital⁵. The study found that Māori and Pasifika children, and those from socioeconomically deprived families were more likely to be exposed to the risk factors of cold, damp, and overcrowded housing. Resultantly, these demographics are at a higher risk for infectious diseases including rheumatic fever, meningococcal disease, skin and soft tissue infections, and pneumonia.

It has been proven internationally that housing quality and affordability have a significant impact on the mental health of occupants. This is especially true for households with a low to moderate household income⁶. Transience and housing insecurity can also play a part, having a major negative impact on the educational capability and performance of children who change schools during their education. The consequences of changing schools manifest themselves in the short to medium term, putting children behind in their schooling, making it difficult for them to catch up to their classmates and build social relationships⁷.

Compounding these risks are the ever-increasing costs of housing, the median sale prices of which rose nationally by around 40 per cent in the years 2008-2018⁸. This has been particularly evident in major urban centres such as the Auckland, Wellington, and fast-growing regions like the Western Bay of Plenty. Rents have risen in tandem with the costs of housing, leaving renters more vulnerable than

³ OECD. OECD Environmental Performance Reviews: New Zealand 2017. [Internet]. Paris: OECD Publishing. 2017. Available from:

<https://www.eds.org.nz/assets/MediaReleases/2017%20Releases/OECD%20Enviromental%20Performance%20Review%20NZ%202017.pdf>. Accessed February 5 2020

⁴ Lawrence M. Tenants evicted after mould, damp complaints: 'We didn't want to be freezing and sick'. New Zealand Herald. [Internet] 2019 July 30. Available from:

https://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=12253559. Accessed 5 February

⁵ Kelly A, Denning-Kemp G, Geiringer K, Abdulhamid A, Alabtain A ,et al. Exposure to harmful housing conditions is common in children admitted to Wellington Hospital. N Z Med J [Internet]. 2013; 126(1387): 108-26. Available from: <https://www.nzma.org.nz/issue-id/vol-126-no-1387-12-december-2013>. Accessed 5 February 2020

⁶ Bentley R, Baker E, Mason K E, Kavanagh A M. Association Between Housing Affordability and Mental Health: A Longitudinal Analysis of a Nationally Representative Household Survey in Australia. Am J Epidemiol [Internet]. 2011; 174(7): 753-60. Available from:

https://www.researchgate.net/publication/51552034_Association_Between_Housing_Affordability_and_Mental_Health_A_Longitudinal_Analysis_of_a_Nationally_Representative_Household_Survey_in_Australia.

Accessed 5 February 2020

⁷ Schwartz A E, Stiefel L, Cordes S A. Moving Matters: The Causal Effect Of Moving Schools On Student Performance. Educ Finance Policy [Internet]. 2017; 12(4): 419-46. Available from:

https://www.mitpressjournals.org/doi/10.1162/edfp_a_00198. Accessed 5 February 2020

⁸ Johnson A, Howden-Chapman P, Eaquib S. A Stocktake of New Zealand's Housing. New Zealand Government [Internet]. 2018. Available from: <https://www.beehive.govt.nz/sites/default/files/2018-02/A%20Stocktake%20Of%20New%20Zealand%27s%20Housing.pdf>. Accessed 5 February 2020

ever. These circumstances have particularly impacted on Māori and Pasifika, further reducing opportunities to enter homeownership.

Comments on the Bill

Interface with Māori Interests

Empowering Kāinga Ora to undertake more streamlined urban development has the potential to significantly contribute to the alleviation of housing pressure in Aotearoa New Zealand. Addressing structural issues in this context may allow for the construction of more intensified housing in our urban centres, which have better access to public transport, and are more accessible to our population.

One of our key concerns with the Bill, is that it may be used in a way which is incompatible with Māori interests. It is clearly acknowledged in the Bill that engaging and working with Māori is a key concern, however the RACP believes that this approach is flawed. In developments such as those that will be enabled by the Bill, Māori must be empowered within the leadership of the projects themselves. Continuing to engage with Māori in a way which considers their interests as outside that of the mainstream, and other to that of the main project goals, perpetuates racism and inequality in Aotearoa New Zealand.

Aside from this problematic conception of Māori interests, it is also of concern that while the Bill has particular clauses pertaining to the transfer or disposal of former Māori land, the development of Māori customary land, reservations, and freehold land; it does not provide a specified and reliable process by which to facilitate Māori decision-making in Kāinga Ora developments. While it is required that Kāinga Ora must seek expressions of interest from Māori in developing any land within the project area, in the case that this is not taken up, Māori should still have significant input on the use of land. However, the process is governed by vague requirements to engage with Māori and provide time for a response to be developed. This does not ensure that the opinions solicited in this engagement will be provided with any certain weight in the development, and may lead to Māori interests becoming sidelined, in favour of other stakeholders. Guaranteed Māori representation on the Independent Hearings Panel which will evaluate Kāinga Ora's draft development plans could alleviate this, however this is again impacted by the design of the Bill, as it ultimately falls to the Minister to approve the draft development plan.

Gentrification

Development of areas with residents that are primarily of a low socio-economic status often leads to gentrification, and the breakup of both communities and the important relationships which make them up. In Aotearoa New Zealand, Māori and Pasifika people are particularly impacted by this, due to income inequity, and systematic issues resulting from racism and colonisation⁹. This is a process which has commonly occurred over recent decades as a result of projects such as the Tamaki Regeneration. Undertaken by one of Kāinga Ora's predecessor organisations, the Tamaki Regeneration Project has caused significant damage to vulnerable people, separating them from their

⁹ BERL. Change Agenda: Income Equity for Māori. Tokona Te Raki. [Internet]. Available from: <http://www.maorifutures.co.nz/wp-content/uploads/2019/11/Income-Equity-for-Maori.pdf>. Accessed 5 February 2020

homes, friends, whānau and support networks¹⁰. It is crucial that further development which supports the availability of housing in Aotearoa New Zealand, does so without impacting on communities in this way.

Accessibility

It is important that in any accelerated developments made possible by the Urban Development Bill, accessibility is addressed in a number of ways. Prominently, this includes access to public transport and community facilities, alongside design aspects such as ensuring buildings are accessible to differently abled people.

The RACP believes that new housing developments must be accessible to public transport. Creating healthy and sustainable cities is crucial to wellbeing in Aotearoa New Zealand, and requires public transport to be in close proximity to housing, so as to motivate a modal switch from private vehicles such as cars to the more efficient mode of public transport. Increased physical activity and reduced carbon emissions have many positive implications for health, and can be accomplished through people-centred urban planning¹¹. These priorities are reflected in the Government Policy Statement on Land Transport, and must be reflected in the mandate of Kāinga Ora under the Urban Development Bill, if it is to be able to deliver intensified housing which is relevant to the idea of a modern and sustainable city¹².

To support wellbeing, it is also important that developments are designed with accessibility to recreational activities, social sites, green spaces, and many other elements of people centred urban design in mind. These aspects of life are key to ensuring a higher standard of living for residents¹³.

Building upon this, the developments themselves must be designed with physical accessibility to all people in mind. Aotearoa New Zealand as a society contains a huge variety of people with different levels of ability to traverse our built environment. It is incredibly important that buildings are designed with this in mind, and access anticipated for every person in Aotearoa New Zealand. To ensure that this is a priority, it should be specifically stated as a mandate for Kāinga Ora's actions under the Urban Development Bill. For example, a requirement to produce environments built around the concept of universal design, as specified in the Auckland Design Manual¹⁴.

¹⁰ Gordon R. State-led gentrification and impacts on residents and community in Glen Innes, Auckland [thesis]. Auckland: The University of Auckland; 2015. Available from: <https://researchspace.auckland.ac.nz/bitstream/handle/2292/26241/whole.pdf?sequence=2>.

¹¹ Ministry of Health. Integrating Health Impact Assessment in Urban Design and Planning: The Manukau Experience. [Internet]. 2011. Wellington: Ministry of Health. Available from: <https://www.health.govt.nz/publication/integrating-health-impact-assessment-urban-design-and-planning-manukau-experience>. Accessed 5 February 2020

¹² Ministry of Transport. Government Policy Statement on Land Transport. [Internet]. 2018. Wellington: Ministry of Transport. Available from: <https://www.transport.govt.nz/multi-modal/keystrategiesandplans/gpsonlandtransportfunding/>. Accessed 5 February 2020

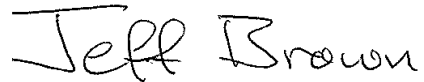
¹³ Anttiroiko, A. Wellness City : Health and Well-Being in Urban Economic Development [Internet]. London: Palgrave Macmillan; 2018 [cited 2020 Feb 5]. Available from: <https://www.palgrave.com/gp/book/9783319755618#aboutBook>.

¹⁴ Auckland Council. Auckland Design Manual [Internet] Available from: <http://www.aucklanddesignmanual.co.nz/>.

Conclusion

The RACP thanks the Environment Select Committee for the opportunity to provide feedback on the Urban Development Bill. To discuss this submission further, please contact the Aotearoa NZ Policy and Advocacy Unit at policy@racp.org.nz.

Nāku noa, nā

A handwritten signature in black ink that reads "Jeff Brown". The signature is written in a cursive, slightly slanted style.

Dr Jeff Brown
Aotearoa New Zealand President
The Royal Australasian College of Physicians