

# **Ministry for the Environment**

## **National Policy Statement on Urban Development**

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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 Ministry for the Environment's National Policy Statement on Urban Development.
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 in regards to the protection of highly productive land, housing affordability, ageing population and building quality urban environments.

## **Specific Comments**

4. NMH welcomes the opportunity to comment on the Proposed National Policy Statement on Urban Development (NPS-UD). It is important that urban growth is planned for so that people have easy access to services, open spaces and infrastructure they need, to avoid hazards and to protect highly productive land. Urban development and the urban form can influence the conditions in which people are born, grow, live, work and age and therefore effect people's wellbeing.
5. NMH is pleased to see that the intention of the NPS-UD is to ensure that urban planning enables people and communities to provide for their social, economic, and cultural wellbeing through development that supports quality urban environments.
6. NMH notes that the proposal defines two categories of urban environment: local authorities in all urban environments and local authorities in major urban centres. NMH sees the two categories as being too limiting for those towns that are not classed as major urban centres but are facing housing pressures such as Nelson Tasman. It would be useful for local authorities in high growth areas that are not listed as major urban centres to have tools that allow for more intensified housing, greater housing typologies and the protection of productive land.
7. The preface of the consultation document highlights the need to address housing affordability. However the mechanisms within the document do not seem to enable the provision of affordable housing. The rules make mention for greater density and smaller lot sizes, however this does not guarantee that small, more

dense houses will be affordable by those on average incomes. Housing affordability is a major issue in our area with Tasman and Nelson now becoming the second and third least affordable region for home buyers according to the Massey Home Affordability Index to June 2019<sup>1</sup>. Furthermore rental prices have continued to increase in the region.

8. 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 lead to poorer health outcomes. Increased in housing costs have a more severe impact on lower and fixed-income households. 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.<sup>2</sup> In addition, housing is a significant part of family wealth in New Zealand with home-ownership proving a means to pass on resources between generations<sup>3</sup>.
9. 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.
10. NMH recommends that the NPS-UD includes mechanisms that will enable more affordable housing to be built through lowering consent and building costs.
11. **Future Development Strategy:** NMH supports the proposed changes to future development strategies. NMH notes that under the draft objectives and policies under future development strategy there is no direct reference to either climate change, sea level rise or the protection of highly productive land.
12. Given the proximity of most urban centres to the coast, it is important that strategic documents provide direction on strategies to reduce the impacts of sea level rise. NMH recommends that P1D includes an additional bullet point that

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<sup>1</sup> <https://www.stuff.co.nz/life-style/homed/houses/115597449/housing-affordability-worsens-in-nelsontasman-region>

<sup>2</sup> 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>

<sup>3</sup> <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>

*Every FDS must identify i) areas where there will be sea level rise.* Whilst it is expected that Councils will be aware of the effects of coastal erosion and inundation in their areas, it is important that this information is clearly articulated to the public through any relevant future development strategy.

13. Moreover, the importance of protecting highly productive land for food production should also be articulated in a future development strategy. 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 protective land is protected from urban encroachment. NMH recommends that P1D includes an additional bullet point that *Every FDS must identify j) areas where there is highly productive land.*

14. NMH recommends that Future Development Strategies are formally recognised within the Resource Management Act. They are currently non-binding documents however in order for them to be fully effective they should be given statutory weight.

15. **Describing quality urban environments:** NMH supports the rationale regarding quality urban environments and agrees that these should include the likes of *reducing the impact on the natural environment, using ecologically sensitive design, enhancing safety and good health, promoting resilience, providing transport options and reflecting heritage*. However none of the aforementioned descriptors have been mentioned within the proposed objectives or policy mechanisms, therefore it is difficult to see how a quality urban environment would be created without explicitly including these descriptors.

16. In addition, NMH notes that accessibility and universal design have not been included. It is well acknowledged that New Zealand's population is ageing but there has been no mention about how the urban environment may need to be modified to make it more accessible in terms of street or house design, house typography or universal design.

17. 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<sup>4</sup>. 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. 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.<sup>5</sup> 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.'<sup>6</sup>

18. NMH considers that developers need to be provided incentives to incorporate universal design features within 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<sup>7</sup>.
19. *Typology*: The NPS-UD also needs to give consideration to the needs of a changing population. New Zealand's population is ageing, in addition there is an increasing number of single-person households and smaller family sizes<sup>8</sup>. Quotable Value notes that average sizes of new builds increased from 166.4 metres in 1990 to 205.3 square metres in 2010 onwards<sup>9</sup>. A Stocktake of New Zealand's Housing report stated that "Construction companies believe this is where the greatest demand is (and margins)". This has led to a shortage of smaller dwellings. The NPS-UD needs to enable developers to build a greater number of smaller houses to cater for changing demographics.

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<sup>4</sup> 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.

<sup>5</sup> Lifemark. 2017. Positive changes: More access to more homes. <http://www.lifemark.co.nz/news/positive-changes-more-access-to-more-homes/>

<sup>6</sup> BRANZ. N.d. Universal Design. [https://www.branz.co.nz/cms\\_display.php?sn=215&st=1](https://www.branz.co.nz/cms_display.php?sn=215&st=1)

<sup>7</sup> 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>

<sup>8</sup> Bryson, K. & Natalie Allen (2017) *Defining medium-density housing*. BRANZ Report SR376 [https://www.branz.co.nz/cms\\_show\\_download.php?id=8f539a4cd06da4fe57e215051ec5374eeb25628b](https://www.branz.co.nz/cms_show_download.php?id=8f539a4cd06da4fe57e215051ec5374eeb25628b)

<sup>9</sup> Johnson, A., Howden-Chapman, P., Eaquib, S., (2018). *A Stocktake of New Zealand's Housing report* <https://www.beehive.govt.nz/sites/default/files/2018-02/A%20Stocktake%20Of%20New%20Zealand%27s%20Housing.pdf>

20. NMH also advocates for the inclusion of the recognition of sea level rise and the protection of highly productive land to be included within criteria relating to managing environmental effects to ensure a quality urban environment.

### **Providing for further greenfield development**

21. As previously noted in this submission, it is vitally important that highly productive land is not used for urban development. Any policy regarding greenfield development must specifically protect and preserve highly productive land for food production.

### **Removing minimum car parking requirements**

22. Easy access to car or bike parking is a major factor influencing daily commute.<sup>10</sup> The availability of parking induces car ownership and car use. Trip frequency does not change with car ownership or access to home parking, but it does affect mode share. Minimum parking requirements can cause an over-supply of parking, and negatively affect living costs, construction costs, land use, car ownership and mode share.<sup>11</sup> NMH is supportive of the removal of minimum car parking requirements and advocates for maximum car parking requirements which will have positive benefits by an increasing walkability, a reduction in congestion and carbon emissions, a reduction in housing costs.<sup>12</sup>

23. NMH recommends that the NPS-UD includes minimum cycling requirements. Access to bicycle parking must be easy and convenient. It should be as barrier-free as possible, weather-protected, theft-secured and provided in sufficient numbers in or near the entrance to buildings, taking bicycle ownership as well as (projected) daily/regular use into account. Facilities to accommodate the increasing diversity of bicycles, such as tricycles, cargo bikes and bike trailers should also be provided.<sup>12</sup>

24. Existing developments without bicycle parking should be retro-fitted, either by converting car parking spaces into bicycle parking or by providing parking facilities near/adjacent to buildings. An adequate number of power sockets should be installed for recharging e-bikes

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<sup>10</sup> <https://www.smartcitiesworld.net/news/news/france-top-for-sustainable-parking-policy-3997>

<sup>11</sup> Küster, F. and Peters, M. (2018). *Making buildings fit for sustainable mobility – Comparing regulations for off-street bicycle and car parking in Europe*. European Cyclists' Federation. Brussels. November 2018. [https://ecf.com/system/files/Bicycle%20vs%20Car%20Parking%20in%20Building%20Codes\\_ECF\\_ONLINE.pdf](https://ecf.com/system/files/Bicycle%20vs%20Car%20Parking%20in%20Building%20Codes_ECF_ONLINE.pdf)

<sup>12</sup> <https://www.citylab.com/perspective/2019/09/parking-lot-urban-planning-transit-street-traffic-congestion/598504/>



25. Large parking facilities should have a focus on managing mobility by including cycle parks, bike/ride sharing, charging points for electric cars and bikes.
26. Furthermore, housing development should occur in higher density neighbourhoods where mobility needs are met primarily by walking, cycling, public transport and shared/pooled services.
27. NMH recommends that Option 2: removing the ability for local authorities to set minimum parking requirements is adopted.
28. NMH recommends that these restrictions should not only apply to major urban centres but should be applied nationally because many towns throughout New Zealand are seeking compact forms with mixed use and higher residential density not just the major urban centres.<sup>13,14</sup>
29. NMH agrees that parking spaces for those with limited mobility are not included within the scope of this policy. The total number of mobility parking for people with disabilities need to be maintained when removing minimum parking requirements. This can be achieved by directing councils to adjust the ratios of spaces required to be allocated for mobility parking in off-street car parks and to prioritise remaining on-street parking for disabled parking, taxis, and service vehicles. NMH encourages the Ministry to consider increasing the number of these type of parking spaces to cater for demand as the population ages.

## Conclusion

30. NMH thanks the Ministry for the Environment for the opportunity to comment on the National Policy Statement on Urban Development.
31. NMH **does not wish to be heard** in support of its submission.

Yours sincerely



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<sup>13</sup> Genter, J.A, Schmitt, L., Donovan, S. (n.d) The Missing Link: Parking as the integration of transportation and land use [https://www.transportationgroup.nz/papers/2008/Genter\\_Schmitt\\_Don\\_Parking\\_IPENZ.pdf](https://www.transportationgroup.nz/papers/2008/Genter_Schmitt_Don_Parking_IPENZ.pdf)

<sup>14</sup> <https://www.tasman.govt.nz/my-council/key-documents/more/future-development-strategy/>