



Central Hawke's Bay Proposed District Plan

Hearing Stream 2

Submitter statement of Forest & Bird, submission S75 and further submission FS9

17/03/2022

1. Forest & Bird's submissions addressed many matters throughout the proposed plan, including seeking retention of provisions we support, seeking clarification of wording, and seeking amendments. All of our submission were intended to ensure the plan provides for the protection, maintenance, and enhancement of the natural environment.
2. In the s42A report, the officer sought a clarification from Forest & Bird as to what we meant in our original submission regarding a point about housing provisions. This statement clarifies that point.
3. The officer's report stated (key point highlighted):

5.3.8 Royal Forest and Bird Protection Society NZ (Forest & Bird (S75.008)) seek to amend Policy SSB-P1, to refer to promoting 'medium-high density housing with small footprints', to ensure a minimal environmental footprint, smaller requirement for new infrastructure, and reduced use of highly productive soils.

5.3.9 Based on the respective zone chapters within the PDP, medium-to-high density housing will not be appropriate in every location. The only zone that promotes medium density development is the General Residential Zone (GRZ-P4).

5.3.10 I am uncertain what the submitter means by 'small footprint'. It may be that the submitter is referring to housing with a small gross floor area, or that housing should have a small environmental footprint/effect? It would be useful for the submitter to clarify this at the hearing.

5.3.11 The SSB – Sustainable Subdivision and Building chapter seeks to promote incorporation of water and energy-use efficiency, on-site management of stormwater and sustainable building design features are a significant part of avoiding or mitigating adverse effects on the environment. I consider that the chapter already promotes a 'smaller requirement' for new stormwater infrastructure by encouraging the utilization of low impact stormwater solutions for developments.

5.3.12 If the submitter seeks to ensure that the physical size of the footprint of houses is constrained, such that there remains an area of land within each site that is retained as impermeable area, then under PDP provisions that is achieved through a combination of standards under the residential zone provisions relating to minimum building setback from boundaries, residential density limits, and provision of outdoor living spaces and outdoor service spaces. I note that there is no building coverage standard in the General Residential Zone

4. In this context, we were seeking the policy promote housing that has a small *physical* footprint. This is because physically smaller houses use less materials, consume less energy, are easier to heat, can be put closer together (and put closer to transport routes and shopping centres – thereby requiring less use of personal cars etc.), use up less land, create less stormwater runoff, provide for more land being left as a permeable soak for rain, etc. – and thereby have a smaller environmental footprint.
5. We appreciate the officer’s point that the impacts of stormwater and minimising its impact are dealt with in part in the SSB section of the plan. However we do not consider this deals with the physical size of buildings and promoting ‘lower-impact’ housing from that perspective. We also note that provisions on “minimum building setback from boundaries, residential density limits, and provision of outdoor living spaces and outdoor service spaces” will not necessarily mean areas remain impermeable – e.g. these areas could easily be concreted or otherwise covered. And they don’t address all the other benefits smaller homes present (as above).
6. We acknowledge this is dealt with in part in the zoning chapter. E.g. **GRZ-P4: To promote medium density development as the predominant residential character.**
7. However, we were seeking one more explicit direction to promote smaller house size that tied in with the other SSB provisions – i.e. that fitted alongside other concepts of sustainable design. We considered that while the other SSB design provisions/principles are good, these do not alone promote a ‘low impact’ house. For example, a house can be well designed, oriented to the sun, have a ‘sustainable’ stormwater system (e.g. a green roof), but could still be substantial in size - using a lot of materials and having a much larger *environmental* footprint than other houses. While the average house size in New Zealand has reduced from 200 square meters in 2010 down to 156 square meters in 2019¹, this is still much larger than in 1990, when houses were 125 sqm.²
8. Our submission simply sought to promote a transition back to smaller (in terms of physical footprint), more sustainable, housing.

¹ <https://www.latitudehomes.co.nz/blog/what-is-the-average-house-size-in-new-zealand/>

² <https://thespinoff.co.nz/society/15-05-2017/why-does-new-zealand-keep-building-such-massive-houses>