Planning for successful cities - a proposed National Policy Statement on Urban Development

Submission Reference no: 127

Riccarton Bush-Kilmarnock Residents Association

Submitter Type: Environmental NGO/community group
Source: Web Form
Overall Position: Oppose

Clause
Question 1. Do you support a national policy statement on urban development that aims to deliver quality urban environments and make room for growth? Why/Why not?

Position
No

Notes
Christchurch is a case study of a similar approach (of central direction) to this one being recently applied after the Canterbury earthquakes, where the central city (within the "four avenues") planning was taken over by government appointees. The results have not been good for the city, with slow decision-making and politics causing the flight of investment capital from the city. Our Association appeared before the Independent Hearings Panel to argue that the Riccarton area not be zoned medium density. Our area adjoins a heritage Site; Riccarton House and Bush. The Hearings Panel agreed and we retained our suburban density zoning. Our community was stressed through the process. We should not have to go through this again. It appears from this proposal that Central Government is forcing local government to make certain planning decisions. While sufficient land needs to be available, Council should be making the determination regarding zoning. Christchurch is unique amongst major cities in that the housing supply here is ample and house prices have recently fallen. It is very disappointing to see the largely-discredited theory of Key Activity Centres being applied in the NPS-UD. One only has to look at the Australian experience to see the harm this approach can do to urban environments: In "Who Killed Melbourne 2030" (2011), Paul Mees refers to Birrell et al in "Melbourne 2030: Planning Rhetoric Versus Urban Reality" (2005) to argue that the strategy’s aim of locating most new households in nominated "activity centres" will fail, as high land and construction costs make large-scale developments in these centres too expensive, leading to urban infill spreading randomly across existing suburbs. The actual outcome is likely to be continued outward growth of a city, plus loss of neighbourhood character in existing areas. Christchurch has been through two major earthquakes and a terrorist attack. As residents we ask that either Council retains some flexibility with zoning or that the NPS-UD policy omits Christchurch.

Clause
Are there other tools under the RMA, other legislation or non-statutory tools that would be more effective in achieving a quality urban environment and making room for growth?

Notes
Three examples of tools customized to the local Christchurch environment are the Enhanced Development Mechanism introduced in the Christchurch Recovery Plan, that enables higher densities of development where specific criteria are met. A Community Redevelopment Housing Mechanism introduced through the same recovery plan is effectively an overlay providing for higher density of community and social housing. A certification regime also introduced through the Christchurch District Plan process enables the review and certifying of designs for new development by an external expert approved by Council.

Clause
Question 2. Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments? Why/why not?

Position
No

Notes
It seems incredible that, in an era of falling participation in local government (participation in local body elections in Christchurch
central government seeks to further erode the rights of local citizens. To reiterate the importance of, and the reason we have, local government: Local factors such as geography, the environment, ethnic make-up, culture, historic values and economic opportunities are better taken account of by locally elected councils charged with making decisions that affect their communities than any centrally imposed and politically motivated national policies. In making these decisions, local councils have to report to their communities in a clear and accountable way.

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<tr>
<td>Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?</td>
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<td>Notes</td>
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<tr>
<td>No, the approach used assumes that the centrally-determined strategies will deliver the best results, and this is unlikely, as we have pointed out.</td>
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<tr>
<td>Can you suggest any alternative approaches for targeting the policies in the NPS-UD?</td>
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<td>Notes</td>
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<tr>
<td>No. Such targeting should not be done at all.</td>
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<td>Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?</td>
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<td>Position</td>
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<tr>
<td>No</td>
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<td>Notes</td>
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<tr>
<td>Government should support local authorities to formulate their own FDS (Christchurch has one), rather than using a centrally-directed approach.</td>
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<tr>
<td>Do you support the approach of only requiring major urban centres to undertake an FDS? Would there be benefits of requiring other local authorities to undertake a strategic planning process?</td>
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<tr>
<td>Notes</td>
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<tr>
<td>No, there would be little benefit to anyone with the approaches outlined in these policies.</td>
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<tr>
<td>What impact will the proposed timing of the FDS have on statutory and other planning processes? In what ways could the timing be improved?</td>
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<tr>
<td>Notes</td>
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<tr>
<td>Whatever the timeframe, the impact will be adverse.</td>
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<tr>
<td>Question 4. Do you support the proposed approach of the NPS-UD providing national level direction about the features of a quality urban environment? Why/why not?</td>
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<tr>
<td>Position</td>
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<tr>
<td>No</td>
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<tr>
<td>Notes</td>
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<tr>
<td>There should not be direction at a national level, especially not direction based on flawed and discredited ideas, as we have mentioned.</td>
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<tr>
<td>Do you support the features of a quality urban environment stated in draft objective O2? Why/why not? (see discussion document, page 26)</td>
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<td>Notes</td>
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<tr>
<td>Of course we support a quality urban environment, but the NPS-UD will have the effect of eroding the urban features described in O2.</td>
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<tr>
<td>What impacts do you think the draft objectives O2-O3 and policies P2A-P2B will have on decision-making (see discussion document, page 26)?</td>
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<td>Notes</td>
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<tr>
<td>Local citizens and authorities will be disempowered by the centralized approach. Poorly-formulated, faddish plans will be imposed by central government with little or no consultation. We have seen this happen in Christchurch during the earthquake recovery, and there seems to be no end of it.</td>
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Question 5. Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not?

**Position**
No

**Notes**
Time is not a determinant. Amenity values are environmental, practical and cultural. How they are defined, measured and how they may change will differ from one community to the next depending on that community's local needs and priorities. Therefore any national policy that seeks to define amenity across the country will be deeply flawed and potentially destructive.

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<tr>
<th>Clause</th>
<th>Do you think these proposals will help to address the use of amenity to protect the status quo?</th>
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<tbody>
<tr>
<td>Notes</td>
<td>No, but they will erode amenity values of existing urban areas.</td>
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<tr>
<th>Clause</th>
<th>Can you identify any negative consequences that might result from the proposed objective and policies on amenity?</th>
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<tbody>
<tr>
<td>Notes</td>
<td>Yes, the amenity value of affected areas will deteriorate.</td>
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<tr>
<th>Clause</th>
<th>Can you suggest alternative ways to address urban amenity through a national policy statement?</th>
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<tbody>
<tr>
<td>Notes</td>
<td>No, do not use national policy to decide on local amenity values.</td>
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<tr>
<th>Clause</th>
<th>Question 6. Do you support the addition of direction to provide development capacity that is both feasible and likely to be taken up? Will this result in development opportunities that more accurately reflect demand? Why/why not? (see questions A1 - A5 at the end of the form for more questions on policies for Housing and Business Development Capacity Assessments)</th>
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<tbody>
<tr>
<td>Position</td>
<td>No</td>
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<tr>
<td>Notes</td>
<td>Christchurch has unique problems with providing land for development, for example: the central city suffers from &quot;brown fields&quot; land that is not being developed. The city council plans to address this lack of development using penalty rates. A national directive could not have achieved this outcome.</td>
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<tr>
<th>Clause</th>
<th>Question 7. Do you support proposals requiring objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description? Why/why not?</th>
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<tbody>
<tr>
<td>Position</td>
<td>No</td>
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<tr>
<td>Notes</td>
<td>This already happens in the Christchurch city plans.</td>
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<tr>
<th>Clause</th>
<th>Do you think requiring zone descriptions in district plans will be useful in planning documents for articulating what outcomes communities can expect for their urban environment? Why/why not?</th>
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<tbody>
<tr>
<td>Notes</td>
<td>These descriptions already exist in the Christchurch City plans.</td>
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<tr>
<th>Clause</th>
<th>Do you think that amenity values should be articulated in this zone description? Why/why not?</th>
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<tbody>
<tr>
<td>Notes</td>
<td>Yes, amenity values should be included in zone descriptions.</td>
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<tr>
<th>Clause</th>
<th>Question 8. Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not? (for more detail on the timing for these policies see discussion document, page 53)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Position</td>
<td>No</td>
</tr>
<tr>
<td>Notes</td>
<td>We do not support the NPS-UD policies for intensification because they will not provide outcomes suitable for Christchurch.</td>
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Clause
What impact will these policies have on achieving higher densities in urban environments?

Notes
These policies will produce perverse outcomes for Christchurch, which needs more high-density housing in the moribund central city, not in urban areas.

Clause
What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?

Position
Option 1 (the descriptive approach)

Notes
There should not be intensification in urban centres. This is toxic for Christchurch and in any case the city has, thanks to the earthquakes, large amounts of undeveloped or redeveloping land available for housing.

Clause
If a prescriptive requirement is used, how should the density requirement be stated? Please provide a suggestion below (for example, 80 dwellings per hectare, or a minimum floor area per hectare).

Notes
The densification requirement should be applied to the Christchurch city centre.

Clause
What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?

Notes
Done in the way proposed, the impact will be disastrous for Christchurch.

Clause
Question 9. Do you support inclusion of a policy providing for plan changes for out of sequence greenfield development and/or greenfield development in locations not currently identified for development?

Position
No

Notes
Christchurch does not need a huge increase in greenfield development. There are plenty of "brown field" areas existing, especially in the central city, that can be used for high density development.

Clause
How could the example policy better enable quality urban development in greenfield areas (see discussion document, page 37)?

Notes
See above.

Clause
Are the criteria sufficiently robust to manage environmental effects to ensure a quality urban environment, while providing for this type of development? (see example policy in discussion document, page 37)

Notes
See above.

Clause
To what extent should developers be required to meet the costs of development, including the costs of infrastructure and wider impacts on network infrastructure, and environmental and social costs (recognising that these are likely to be passed on to future homeowners/beneficiaries of the development)? What impacts will this have on the uptake of development opportunities?

Notes
Christchurch already has appropriate policies that cover this.

Clause
What improvements could be made to this policy to make development more responsive to demand in suitable locations beyond areas already identified for urban development?

Notes
Development is already occurring in many areas of Christchurch away from urban centres, because the cost of development close to urban centres is very high.
Clause
Question 10. Do you support limiting the ability for local authorities in major urban centres to regulate the number of car parks required for development? Why/why not?

Position
No

Notes
Car park allocation should remain in the hands of local authorities.

Clause
Which proposed option could best contribute to achieving quality urban environments?

Notes
Christchurch has locally-developed policies that adequately address parking.

Clause
What would be the impact of removing car park minimums in just high- and medium-density, commercial, residential and mixed use areas, compared with all areas of a major urban centre?

Notes
The impact would be adverse if any car parking minimums were removed.

Clause
How would the 18 month implementation timeframe impact on your planning processes?

Notes
Whatever the timeframe, the impact will be adverse.

Clause
What support should be considered to assist local authorities when removing the requirement to provide car parking to ensure the ongoing management of car parking resources?

Notes
Christchurch adequately manages car parking already, through policies developed in consultation with it's citizens.

Clause
Question 11. Do you think that central government should consider more directive intervention in local authority plans?

Position
No

Notes
We oppose this. The citizens and local government of Christchurch have a huge investment in the existing plans, which were developed in consultation between the local authorities and the citizens.

Clause
Which rules (or types of rules) are unnecessarily constraining urban development?

Notes
Reasonable urban development is not constrained in Christchurch.

Clause
Can you identify provisions that are enabling higher density urban development in local authority plans that could be provided for either nationally or in particular zones or areas?

Notes
Yes, the Christchurch plan has such provisions, as mentioned.

Clause
Should a minimum level of development for an individual site be provided across urban areas (for example, making up to three storeys of development a permitted activity across all residential zones)?

Notes
High levels of density such as the one suggested would have an exceedingly adverse impact on Christchurch urban areas. This is one example of the "one size fits all" approach of the NPS-UD eroding urban amenity values.

Clause
Given the potential interactions with the range of rules that may exist within any given zone, how could the intent of more directive approaches be achieved?

Notes
This question assumes there is a problem with existing rules, which is not so in Christchurch.
**Clause**

**Question 12.** Do you support requirements for all urban environments to assess demand and supply of development capacity, and monitor a range of market indicators? Why/why not?

**Position**

Yes

**Notes**

This already happens in Christchurch.

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**Clause**

**Question 13.** Do you support inclusion of policies to improve how local government works with iwi, hapū and whānau to reflect their values and interests in urban planning? Why/why not?

**Position**

Yes

**Notes**

This already happens in Christchurch.

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**Clause**

Do you think the proposals are an appropriate way to ensure urban development occurs in a way that takes into account iwi and hapū concerns?

**Notes**

No, this should happen at a local level. How could it not?

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**Clause**

How do you think local authorities should be directed to engage with Māori who do not hold mana whenua over the urban environment they are currently living in?

**Notes**

Local authorities are so directed already.

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**Clause**

What impacts do you think the proposed NPS will have on iwi, hapū and Māori?

**Notes**

Very likely the impacts will be negative and considerable, as for the rest of the population.

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**Clause**

**Question 14.** Do you support amendments to existing NPS-UDC 2016 policies to include working with providers of development and other infrastructure, and local authorities cooperating to work with iwi/hapū?

**Position**

Yes

**Notes**

This is mandated already.

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**Clause**

**Question 15.** What impact will the proposed timing for implementation of policies have?

**Notes**

Whatever the timing, the implementation of the NPS-UD will be adverse.

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**Clause**

**Question 16.** What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?

**Notes**

Because it is based on fundamentally flawed ideas, the NPS-UD is unlikely to be successfully implemented irrespective of the support and guidance given.

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**Clause**

**Question 17.** Do you think there are potential areas of tension or confusion between any of these proposals and other national direction? If so, please identify these areas below and include any suggestions you have for addressing these issues.

**Position**

Yes

**Notes**

We refer you to the report "Enabling Growth - Urban Zones Research" prepared by Beca for the MOE, 10/8/18.
Clause
Question 18. Do you think a national planning standard is needed to support the consistent implementation of proposals in this document? If so, please state which specific provisions you think could be delivered effectively using a national planning standard?
Position
No
Notes
A mandated national planning standard is not needed for Christchurch.

Clause
Question A1. Do you support the changes to the HBA policies overall? Are there specific proposals you do or do not support? What changes would you suggest?
Position
Yes
Notes
We do not support the implementation of these changes, or of the NPS-UD.

Clause
Question A2. What do you anticipate the impact of the proposed polices (and any related changes) would be on planning and urban outcomes?
Notes
For Christchurch, the policies will have an immediate negative impact. To quote the executive summary of the NPS-UD planning document: “Allowing for growth must not be at the expense of well-functioning, vibrant urban and natural environments. The Government wants to maximise the benefits of good urban growth, while minimising the costs and the drawbacks. The Government is seeking to deliver high-quality, liveable urban environments that foster the well-being of people and the natural environment.”

Clause
Question A3. Are the margins proposed in policies AP3 and AP12 appropriate, if not, what should you base alternative margins on? (for example, using different margins based on higher or lower rural-urban price differentials)
Position
No
Notes
The margins are not appropriate and neither is this approach in general. The centre of Christchurch has a uniquely large potential for commercial development and high-density housing that is not being taken up. The proposals in the NPS-UD do not address this at all.

Clause
Question A4. How could these policies place a greater emphasis on ensuring enough development capacity at affordable prices?
Notes
In the case of Christchurch; by better supporting more intensive development of the city centre.

Clause
Question A5. Do you support the approach of targeting the HBA requirements only to major urban centres? Why/why not?
Position
No
Notes
This approach is completely inappropriate for Christchurch. It is based on flawed and discredited notions that have been tried and discarded in, for example: Melbourne.

Clause
Unless you select one of the options below, the Ministry will consider that you have agreed to have your submission and your name posted on its website.
Notes
Note that this submission is on behalf of the Riccarton Bush-Kilmarnock Residents association, which is the name that should be published.