To whom it may concern

Planning for Successful Cities: Regenerate Christchurch submission on the proposed changes to National Policy Statement – Urban Development

Regenerate Christchurch supports the National Policy Statement on Urban Development, which will empower regions with the scale and capability to deliver cohesive public services, with support from central government. This submission provides Regenerate Christchurch’s high-level comment on the NPS document.

The NPS is a mechanism to deliver long term and lasting change, improve urban environments within New Zealand, and ensure consistency across planning (and funding) for high quality urban amenities. In doing so, there must be support for local authorities to focus on the immediate issues that also recognises and enables consideration of long-term outcomes for future generations.

Regenerate Christchurch supports the proposed direction of the National policy statement to ensure:

- a national narrative and vision that is shared across all major urban areas, which also supports smaller, growing urban areas
- formal agreement between Crown and Councils, providing a foundation for private sector confidence in partnership and investment
- a shared understanding on planning and economic development priorities, and a commitment to delivering on these priorities
- an agreed programme of infrastructure and investments, understanding that different urban areas may have bespoke requirements and taking a market-based approach to prioritisation
- engaged communities and private sector organisations, focusing on transparent, outcomes-focused decision-making, investment and policy that supports residents and businesses
- vibrant, healthy and affordable living and housing to meet the community’s needs, with good access to jobs, education, amenities, services, and infrastructure.

Making room for growth
Regenerate Christchurch understands and acknowledges the proposed approach of targeting the most directive policies to our largest and fastest growing urban environments as a starting point,
however urban policies should ideally cater for cities of all sizes, not just major cities. If the NPS is exclusively focused on major cities, it may bias national policy and pit urban and regional areas against each other. Urban areas, regardless of size and growth rates, are facing several new challenges – including climate change and inequality – and need policies that are both innovative and inclusive.

Central government should consider more directive intervention in local authority plans to support and achieve sustainable and affordable urban planning and design outcomes. Currently, too much emphasis is placed on the existing urban or suburban character, trying to fix a place at a certain point of time, rather than allowing it to adapt and change as a city grows. Regenerate Christchurch supports policies to enable intensification in the locations where its benefits can best be achieved to make best use of existing infrastructure, particularly public transport, or to allow for the development of new public transport infrastructure.

Regenerate Christchurch supports removing unnecessary restrictions on development to allow for up-and-out growth, Christchurch requires greater residential density within its central city rather than encouraging further greenfield development. A focus on the central city would satisfy the aims of the Urban Growth Agenda, where improved housing choice and affordability within Christchurch’s central city would support reduced emissions, improve access to urban amenities and promote confidence for further development and investment in the central city.

Regenerate Christchurch supports limiting the ability for local authorities in major urban centres to regulate the number of carparks required for development. The market will determine the correct number of spaces for a development; as land becomes valuable the less likely it will be used for low value carparking (some high value carparking will always exist). District plans previously provided a minimum number of required carparks (and in many zones still do) which imposes fundamental constraints on the development potential of a site and the building typology proposed. Equally, creating maximum carpark numbers in some zones but not in others creates a disincentive for the establishment of certain activities in a ‘no or maximum carpark’ zone where it is perceived that tenants want carparks. An effective method could be removing all requirements in all zones except General Residential.

Decision-making and engagement
To secure the ongoing prosperity and wellbeing of communities, decision-makers have a collective responsibility to ensure that our cities meet the needs of current and future generations through building resilient urban areas that are prepared for future climate and environmental change. This includes coordination to plan and manage finite resources such as water, changes to our built form, physical environment and community behaviours to ensure our regions remain strong and sustainable. Decision-makers must ensure that economic growth can be sustained and increased without uncontrolled compromise of the natural environment or our quality of life.

Urban environments often have higher rates of population and economic growth. As such, they are constantly changing to reflect the needs of their communities. While urban environments share common characteristics, they also have unique local characteristics; the traits that make one urban
environment different from another. Regenerate Christchurch supports the inclusion of proposals to recognise and clarify that amenity values are diverse and change over time. Many councils place significant value on existing values without also explicitly considering the value of future benefits that could result from a specific development. Instead of maintaining the status quo, decision-makers must acknowledge that cities and towns change - and need to change over time - to provide a suitable standard of living for growing populations.

Prioritising a more granular understanding of the current and future patterns of employment, activity and residential opportunities will help inform and shape future decisions on infrastructure provision, land-use decisions. Initiatives should be developed that have the specific objective of enabling community led approaches to neighbourhood creation or renewal. Engagement with should seek to identify and listen to ‘future residents’ in respect of their views on location, affordability and ownership – the ideas should originate from within the neighbourhoods and reflect community aspirations.

**Strengthening the role of iwi and hapū**

Effective engagement requires identifying potential issues and concerns for iwi and hapū and understanding the cultural significance of places or land and the obligations under the Treaty of Waitangi before ground is broken. Innovative policies should draw from local and indigenous knowledge. Urban planning must incorporate indigenous knowledge and prioritise Māori values to shape the environment. Māori knowledge can address urban planning challenges through kaitiakitanga (guardianship and conservation) and ki uta ki tai (interconnected resources and ecosystems).

Decision-making frameworks should integrate indigenous knowledge into engineering design and investment planning, such as the Mauri model. This model translates Māori values and concepts to create common ground with scientific or engineering concepts. The aim is to create a level playing field between two knowledge systems to identify areas of agreement and difference.

Strengthening iwi relationships with local government and private industries not only provides opportunity for cultural consideration and integration at planning stages but ensures future success for generations to come. Proposals can be analysed in terms whether they enhance or detract from mauri – the energy which binds and animates all things in the physical world – in relation to the environment (integrity of the ecosystem), hapu (integrity of cultural identity), community (well-being of society) and whanau (economic wellbeing).

**Concluding statement**

Overall, Regenerate Christchurch considers the proposed National Policy Statement on Urban Development would provide positive guidance for Local Councils. It would give certainty for developers to provide higher densities to support, utilize existing, and create new infrastructure, while protecting high-value productive land. Incorporating indigenous knowledge and decision-making frameworks would ensure future success for generations of iwi and hapu, as well as achieving alignment of cultural values with urban planning, infrastructure and engineering. The
development capacity focus should include matters that contribute to well-functioning and well-designed urban environments, which will support local councils to deliver sustainable and high-quality urban development. Further to this, the NPS-UD should recognise the importance of valuing of potential benefits to offset potential adverse effects, while also explicitly recognising that urban amenity values change over time and are not static.

Successful cities are a key to unlocking enhanced wellbeing outcomes for all New Zealanders, and the NPS-UD will direct and support local decision-makers to achieve success.

Yours Sincerely

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Regenerate Christchurch