PROPOSED NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT

Submission by the Beckenham Neighbourhood Association Incorporated.

PREAMBLE

1 The Beckenham Neighbourhood Association (BNA) covers the suburb of Beckenham, located in South Christchurch, and is among the longest established residents’ groups (if not indeed the oldest) in the entire city, having recently celebrated its 40th anniversary.

2 We acknowledge that the current national housing situation justifies the use of the expression “housing crisis”.

3 We also acknowledge that the dimensions of the crisis are such that, if a solution is to be found, central government must play an overall leading and coordinating role in working towards it.

4 Nevertheless, we are firmly of the view that central government, in performing that role, must also respect local conditions and the role and accountability of local democratic institutions. The balance between central and local authority, and the implications for local democracy, are in our view matters of critical importance. This is an issue with regard to which Christchurch residents, who have experienced the imposition of a fast-tracked new District Plan largely dictated by central government agencies, have cause to be particularly sensitive. This issue is also topical with current concern about low voter turnout in local government elections, which we argue is driven in part by well-publicised examples of local government being neutered on key topics by central government.

5 In this regard we note with concern that at numerous points in the NPS document, and in relation to numerous matters, the NPS appears to be advocating for central government to have power to intervene directly (if not indeed coercively) in city planning, in particular with regard to planning rules.

6 As a matter of general principle, any national policy that enables central government to override or diminish the powers of urban local government authorities such as Christchurch City Council, or which denies local residents any meaningful say regarding changes in their living environment, will be unacceptable to us, and we would support the Christchurch City Council in opposing encroachment on its powers.

POLICY AIMS AND POTENTIAL CONFLICT

7 We take note of the stated aims of the proposed National Policy Statement (NPS):

7.1 Make housing more affordable and reduce car dependency by increasing residential density in areas near city centres and transport corridors (‘making room for growth’ and ‘removing unnecessary restrictions on development’, p8);

7.2 Change the focus from the needs/wishes of existing residents to those of possible future residents and developers (p 29 & 35-36);

7.3 ‘Allow growth up and out’ (p 14);

7.4 But (according to the document) to do the above while still creating ‘high-quality, liveable cities that contribute to the well-being of people and the natural environment’ (p 14).
Laudable though the overall thrust of these aims may be, in our view they contain an inherent element of conflict. Indeed, 5.1–5.3 appear to us to be in conflict with 5.4, in that the former could have major impacts on residential amenity and liveability, depending on how prescriptive they are (in a range from (i) encouraging local councils to change their District Plans to facilitate higher density, through to (ii) imposing rules that all Councils must follow).

Aim 5.2 raises the prospect of conflict between the needs and wishes of existing residents (to whom, as electors and ratepayers, a local council is accountable), versus the needs and wishes of unidentified, hypothetical ‘possible future’ residents (and of profit-seeking property developers) as conceived of in the minds of crystal-ball-gazing planners. This Aim admits the possibility of local communities having their long-established living environment turned upside-down by bureaucratic fiat. Specifically, it would appear to include the possibility of, for example, homes in a residential area being compulsorily purchased and demolished in order to make room for supermarkets and other facilities for the use of “possible future” residents.

Recent experience in Christchurch has shown that what may appear to work well on a drawing board or in a computer model can in fact be thwarted by unforeseen and unintended consequences, paradoxically resulting in fewer long-term residents where the aim was to achieve an increase (e.g. fewer potential residents being attracted because of factors such as lack of open space, less variety in property type and size which excludes families with children, etc.). This, it should be remembered, happened in central Christchurch in an area where the aim was to achieve a density less than that proposed in this NPS.

There are numerous lessons to be learned from the ongoing Christchurch experience, and in our view that experience needs to be thoroughly studied and appropriate lessons learned, especially as regards potentially unforeseen and unintended consequences, before attempting to impose a single national policy across a wide variety of local conditions and circumstances.

**SPECIFIC PLANNING ISSUES**

**Height and Recession Plane Rules**

We note with concern that this is one of numerous areas in which the NPS suggests that central government might use powers to compel changes in city planning rules. For the record our post-earthquake experience in Christchurch leads us to answer Question 11 “Do you think that central government should consider more directive intervention in local authority plans?” with an unequivocal NO.

Recession plane rules (here called ‘height to boundary rules’) have a direct impact on quality of residential life. Relaxation or removal of these rules would mean that many residents could not only lose access to sunlight but might also be deprived of privacy in their gardens or even in their homes.

Height limits afford protection to existing residents against being excessively or unreasonably shaded by neighbouring new buildings. In addition, Christchurch’s experience of earthquakes and the city’s intrinsic seismic vulnerability have created an aversion to tall buildings, which is reflected in the ban now imposed on new development exceeding 28m.

We consider it essential to retain height and recession plane rules, both in order to protect residential amenity and also, with respect to building height, for reasons of seismic safety (and
public confidence therein), and we urge that these rules should NOT be relaxed or removed in the NPS.

**Zone Descriptions**

16 The NPS suggests that Zone Descriptions, like Christchurch City Council’s current “Character Areas (such as Beckenham) are a planning device that “sets clear expectations about the type of development envisaged for an area, giving communities certainty about what will be protected while enabling projects to go ahead” – in other words, a means of mitigating the worst effects of intensification and producing good living outcomes. However, this supposed certainty is diluted by two factors: (1) the likelihood that in practice Zone Descriptions will be rendered virtually valueless by developers being allowed departures from Zone Description criteria in terms of height, recession plane etc. and (2) the statement that “Zone descriptions should be consistent with the National Planning Standards”, which strongly suggests that Councils would be constrained in formulating Zone Descriptions and that Zone residents might be afforded little if any input at all.

**Intensification/High Density Areas**

17 Our greatest concern relates to the NPS requirement for “high density” or “higher density” housing near city centres and mass transit systems. Two aspects of this requirement are of particular concern to us. The first is the definition of ‘high-density’ in the Prescriptive approach as 60 residential units/hectare, whereas the current Christchurch District Plan aims for 50/hectare in the central city (and much less in the suburbs). The second aspect is the requirement under the ‘prescriptive’ approach that district plans MUST zone for high-density ‘within 800m walkable catchment of frequent public transport stops’, as well as within 1.5 km of city centres. In this case, it is of concern that neither ‘frequent public transport’ nor ‘city centre’ are yet defined.

18 If ‘frequent public transport’ means a strip 800 m wide on each side of the main high-frequency bus routes (e.g. Christchurch’s Orbiter, Blue, Yellow, Orange, Purple routes), it probably covers more than half of the entire city of Christchurch, including nearly all of Beckenham. That means that most of Christchurch would be subjected to high-density developments under the Prescriptive approach. This would potentially take a wrecking ball to the character of many suburban neighbourhoods, including many of Christchurch City Council’s ‘Character Areas’ such as Beckenham.

19 This prescriptive option fails to recognise that bus routes and bus stops, which can and do change direction and location at short notice, are different from railway lines and railway stations (as found in Auckland and Wellington), which are more permanent. Bus stops (‘frequent public transport stops’) are therefore poor indicators of where high-density developments should be concentrated.

20 This example illustrates why the prescriptive ‘one size fits all’ approach of the NPS is not workable. The Christchurch City Council should have the authority to decide where high- or higher-density living should be encouraged or required. This would only be possible under the Descriptive approach (p 37, P6C Option 1), and it is for this reason that we prefer the Descriptive approach as being more appropriate.

**CONCLUSION**

21 Our greatest concern regarding the proposed NPS as that it suggests the application to the whole country of the kind of central government intervention in local government responsibilities that Christchurch was subjected to after the earthquakes. It seeks to apply theoretical models created
in Wellington offices with scant regard either to the very varied local realities on the ground or to local democracy.

22 As stated at the outset, we acknowledge both the existence of a housing crisis in New Zealand and the necessity for central government to play a leading role in the quest for solutions. However, we see the proposed NPS, if applied prescriptively, as an overly blunt instrument which, if put in place, will probably need to undergo numerous iterations to deal with unintended consequences, leaving in its wake a trail of failed projects and damaged or destroyed communities.

23 Far better is our clear preference for providing direction to local authorities, and leaving them, in consultation with their communities, to decide on the basis of local information how higher densities and more sustainable cities can be created while still respecting the needs of existing residents.

10 October 2019

For Beckenham Neighbourhood Association Incorporated