1 Introduction to the author of this submission
1.1 This submission is on behalf of an incorporated residents’ group—the Victoria Neighbourhood Association Inc (VNA)—located in Christchurch Central City. There currently are 111 financial members, with an additional 50 – 60 residents and/or property owners we are in touch with regularly, including contact related to this National Policy Statement.

1.2 There is a 13-member Committee, elected at the May 2019 AGM to conduct business and represent the wider community on behalf of the wider membership. The main points covered in this submission were discussed by Committee members and circulated to all other members.

2 Overview of submission
2.1 We identified five key points most relevant to us as residents/property owners in the Christchurch Central City. They are:

- Aims of the NPS (in particular pages 8, 14, 29, 33-36 in the document)
- Urban environments and amenity (pages 26-29 and 35-37)
- Reducing or removing rules such as height and height-to-boundary, limits on density and subdivisions and minimum property sizes (pages 42-45)
- Zone descriptions (pages 33-34)
- Intensification/Higher- and High-density areas (pages 15-20, 35-39)

2.2 We already have experienced the impact of policies and rules similar to those covered in the NPS. Rules related to intensification were enacted under the Earthquake Recovery Plan, later enshrined by the District Plan Review. In particular, we have experienced unintended consequences of attempting to achieve an overall density of 50 dwelling per hectare, primarily by requiring at least one unit for every 200m². This level of intensification is even less than the 60/hectare mooted in the NPS (P6C Option 2, pg 37) or the whopping 80/hectare on pg 38.

2.3 Our feedback is covered in responses under the following questions from the NPS-UD consultation document:

| Question 1 | Question 5 | Question 7 | Question 8 | Question 11 |
Question 1: Do you support a National Policy Statement on Urban Development that aims to deliver quality environments and make room for growth? Why/Why not?

2.4 The aims of the NPS are stated in several places throughout the document (e.g. pgs 8, 14, 35-36 and under Urban Amenity (pgs 26-29).

2.5 Our interpretation of the main aims are to (i) make housing more affordable (ii) reduce car dependency (iii) encourage/require growth ‘up and out’ (iv) increase residential density in areas near city centres/transport corridors (v) change the focus from the needs/wishes of existing residents to possible future residents and developers and (vi) create ‘high-quality, liveable cities that contribute to the well-being of people and the natural environment’ (pg 14).

2.6 OUR RESPONSES:

- There seldom is a simple ‘yes or no’ response to questions asked in consultations such as this. The issues are much more complex. As residents of a major central city which already has undergone intensification-by-decree, we know that aims such as the first five listed above often are in opposition to ‘high-quality, liveable' neighbourhoods. We also know that ‘high-quality’ and ‘liveable’ often are compromised or ignored in favour of the proposed development.

- The main weakness in the NPS is its underlying assumption that higher density (in terms of the number of dwellings) necessarily translates into (a) more affordable housing and (b) more people living in the targeted area. Ironically, requiring a minimum number of dwellings/hectare (or as in Christchurch, one unit per 200m²) can have the opposite effect in existing residential neighbourhoods. Specific examples are given in 2.13, below.

  (i) The majority of new builds in existing residential neighbourhoods are tall, skinny townhouses because that is the design most suited to smaller sites (under 600m²) in neighbourhoods such as ours. They cater mainly for couples and single people and are far from ‘affordable’ for most people. Small units in new apartment buildings—also suitable for only one or two people—are expensive for the amount of space provided and are being turned into short-term accommodation such as AirBnB.

  (ii) The sameness of the new builds has reduced the variety of households and the number of families in central city neighbourhoods such as ours.

- The unintended consequences of imposing specific density rules have included: (i) less variety in size and type of dwelling (ii) fewer families and long-term residents because of the type of dwellings and/or lack of outdoor space (iii) fewer trees or even small vegie gardens (iv) proliferation of short-term accommodation, primarily AirBnB and (v) a consequential reduction in number of permanent residents in some neighbourhoods.
• Whatever changes are made under this NPS, we strongly urge government to take these likely consequences into account. We are particularly concerned that relaxing building rules such as height and height-to-boundary (i.e. recession plane) would be counter-productive to the stated aim of ‘well-functioning cities that contribute positively to people’s well-being’ (pg 8)

Question 1 (sub-question): Are there any 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?

2.7 OUR RESPONSE:
• YES. Protect residential land from non-residential intrusions. In our own neighbourhood, residential land has been lost to car-parks, businesses, large churches or social service agencies and developments devoted to AirBnB commercial rentals. This is not because of the earthquakes—it started many years ago and has continued. From 1990 – 2014, there were 11 such applications approved in our small neighbourhood. This is a significant loss of residential potential.

• Non-residential intrusion is inevitable in neighbourhoods within the central city unless there is a mandate to severely limit it. Specific rules and standards need to restrict ways non-residential uses can intrude into residential areas. Too often, local authority planners or commissioners decide the impact of a non-residential activity (even very large ones) would be ‘less than minor’. Loss of residences and potential residences is not minor when the goal is to increase residential density.

Question 5 (sub-question 1): Do you think these proposals [re amenity values] will help address the use of amenity to protect the status quo?

2.8 OUR RESPONSE:
• We disagree with the assertion that the focus has been on the status quo at local authority level, at least not in Christchurch. For example, it has been much too easy for applicants to obtain approval for non-residential activities to replace residential land (‘the status quo’ in areas zoned Residential). See 2.7, above.

Question 5 (sub-question 2): Can you identify any negative consequences that might result from the proposed objective and policies on amenity?

2.9 OUR RESPONSE:
• YES. Together with other NPS proposals (e.g. relaxing or removing rules related to height and height-to-boundary), the proposals re amenity would make areas targeted for intensification much less liveable and attractive for both existing and potential new residents. It is a myth that new residents want something completely different from what attracted current residents in the first place—and what has kept many of us here for years. This has been validated several times in surveys conducted by the Christchurch City Council.
• It also is incorrect that the majority of current residents who have chosen to live within the central city are wealthy, live in expensive houses and use cars as their main mode of transport.

**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?

**2.10 OUR RESPONSES:**

• It is difficult to assess the implications of these proposals.

• We agree that Zone descriptions could give ‘communities certainty about what will be protected while enabling projects to go ahead’ (p.33).

• We agree that it’s the rules, standards and assessment criteria that drive development (not higher-level objectives and policy statements).

• There appears to be some merit in the idea, but not if it enshrines the NPS’s overall philosophies of (i) ‘one-size-fits-all’ and (ii) lack of support for people who already live in and have contributed to the development of existing neighbourhoods.

• In other submissions, the VNA has pointed out the mis-match between (i) the stated goals of increasing the number of residents in the central city and providing a variety of housing to attract a variety of people and (ii) the lack of ‘teeth’ when it comes to turning down incompatible applications. *We would welcome stronger rules to protect residential land and residential amenity such as sunlight and some privacy. This can be achieved while still increasing density.*

• **We have three concerns about the proposal re to zone descriptions:**
  (i) that Zone descriptions ‘should be consistent with the National Planning Standards’ (p.33), which makes us wonder how much latitude there would be for local authorities to develop meaningful zones and descriptions
  (ii) unless the descriptions are clearly worded and supported by clear rules, they could do more harm than good
  (iii) the process by which Zones would be identified and descriptions developed. how much consultation? with whom? would current residents within a zone have any say?

**Question 8:** Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not?

**2.11 In our responses below, we are focusing on residential neighbourhoods in or near the central city of main centres such as Christchurch. This is where VNA members live and/or own property. These neighbourhoods already are densely**
populated: the section sizes are small (many single-dwelling sections are less than 500m²); land is also relatively expensive, so multi-units are common.

2.12 OUR RESPONSES:

- **We agree that intensification should be where it would be beneficial.** Any other approach would be daft.

- **We agree that higher-density housing have not always been developed in a way that ‘enhances the urban environment...’** (pg 35). There are some horrible examples in post-earthquake Christchurch.
  
  (i) One reason is the mandated rule of one unit/household for every 200m² in the central city. This includes existing neighbourhoods already very close to the over-arching goal of 50 dwellings per hectare, e.g. the VNA calculated the density here as 49.7/hectare.
  
  (ii) Removing restrictions on minimum size of dwellings encouraged tiny apartments unattractive to long-term residents. They seem to be used primarily for short-term stays (including AirBnB commercial rentals within areas zoned Residential).

- **We disagree there is a bias towards existing residents at the expense of the ‘wider community’** (pg 35), at least not in Christchurch central city. The primary concerns of residents in the VNA area (and other central city neighbourhoods too) are (i) non-residential intrusion and (ii) loss of sunlight if over-built. Both of these concerns are relevant to most people.

- **We are concerned that the NPS assumes intensification (i.e. increasing the number of dwellings) necessarily equates to an increase in residents.** By ‘residents’, we mean people who live in an area full-time—not hotels-by-stealth as in the proliferation of small apartments used as AirBnB-type rentals. The larger multi-townhouse configurations can also result in fewer people than in the previous stand-alone houses, which also had some outdoor space for families. The VNA documented the outcomes of ‘intensification’ on the streets in our neighbourhood. Two examples are given below.
  
  (i) single house on 520m² section was home to family of 6 (with vegie garden and outdoor play area); 2 new townhouses on same site have 3 people total, with no outdoor space. Net decrease in residents = 3 (including 1 family);
  
  (ii) two older-style 2-storey houses (4 flats each) on 1200m² with back yards were demolished and four townhouses built, taking up entire area. Net decrease = 10 (including loss of 2 families)
Question 8 (sub-question 1): What impact will these policies have on achieving higher densities in urban environments?

2.13 OUR RESPONSE:
• Ignoring what makes a place attractive to a variety of people, including those specifically mentioned in the NPS will result in less cohesive neighbourhoods. Residents will come and go, rather than contribute to ‘neighbourliness’, with a commitment to the local area. The goal of intensification should not be to create short-term enclaves of people at the expense of real neighbourhoods.

• Taken as a whole, the proposals in the NPS are likely to result in a sameness of design that will cater for only certain people, excluding families.

Question 8 (sub-question 2): What option/s do you prefer for prescribing locations for intensification?

2.14 OUR RESPONSE:
• Of the two options given, definitely P6C Option 1 (Descriptive). Although the central city, where we live, would be a targeted area under either option, the 800m public transport catchment would not work for the city as a whole. It would classify over half of Christchurch classified as ‘high-density’—a ridiculous outcome. The suggestion 60 units/hectare also is too high for a prescriptive rule, even in the central city. See 2.12, above.

• Option 1 also makes it possible that even some parts of the central city (i.e. established neighbourhoods with density close to the goal) could be protected from the worst effects of unbridled intensification through the use of Zone Descriptions.

Question 8 (sub-question 3): If a prescriptive requirement is used, how should the density requirements be stated (e.g. 80 dwelling/hectare or minimum floor area/hectare)?

2.15 OUR RESPONSE:
• 80/hectare would be diabolical! We assume this is a typographical error and should be 60 (also too high as a minimum). From our experience with intensification, we disagree that rules should be this specific. The ‘one-size-fits-all’ mentality is counter-productive. Other considerations such as size of current residential sites, cost of land, what the market indicates people want and so on will drive higher density without resorting to this level of prescription.

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

2.16 No (see below). These proposals are likely to have the most significant impact on residents, particularly those living in the central city (where intensification is likely to be the most prevalent). In particular, the assertion that one of the
primary ways of achieving density is to reduce or completely remove rules that ‘constrain urban development’ (p.42).

2.17 **OUR RESPONSE:**

- **Intervention re height or height in relation to boundary (i.e. recession planes) should NOT be dictated.** Regardless of anything else that comes out of the NPS, relaxing or removing these rules in particular would be disastrous from a residential amenity perspective.

- **Instead, the rules protecting an existing dwelling (in a residential area) from losing light and sun should be strengthened.** Recession planes are the most crucial, but so is height itself. Being over-shadowed by a building much higher than those around it would be the single greatest deterrent for most people.

- We already have mentioned the consequences of very small apartments and new builds with very little outdoor space. In particular, loss of families in neighbourhoods where they are a great asset; inability to have even a small vegie garden; lack of trees, other than small shrubs.

- **We also suggest that instead of prescribing minimum sizes, size coverage etc, the relevant rules should simply make it possible to provide for the market desiring greater density.** Prescribing minimums results in the unintended consequences discussed in 2.6 and 2.12, above.

- **We also reiterate that the best way to increase density in residential areas is to limit the number and size of non-residential activities.** Small residential areas such as ours which are vulnerable to commercial intrusion because of close proximity to the CBD. There is no need for any non-residential activities except when the owner of the commercial activity lives on site.

2.18 **Christchurch provides a good example of why a more directive intervention is inappropriate.** Post-quakes, there is a strong aversion to tall buildings and rightly so. Residents made it very clear in the ‘Have a Say’ consultation that they wanted a lower-rise city. It is not just fear driving this. There have been numerous benefits: (i) reduction in wind tunnel effect (ii) more sun and light between buildings (iii) greater feeling of safety and (iv) a more human scale. This would be the same, whether it’s in the CBD itself, in residential areas near the central city and in new suburban developments.