Submission

Consultation Title: Proposed National Policy Statement on Urban Development

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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

Residents buying into a residential inner-city area or other need certainty that their amenity will not change over time by neighboring developments being allowed despite breaking the rules. Nonresidential properties being allowed in residential areas (as has happened in my central area) undermine the objectives on increasing intensity and also ruins the neighborliness of the inner city. I support Zones if that means bringing back the special amenity residential only areas in the inner city – SAM’s but with much more residential protection from intrusion than previously.

Unless Zone descriptions are clearly worded and supported by very clear rules, unlike the ‘restricted discretionary’ or ‘discretionary’ rules have in the past, I expect developers to work around them via departures re commercial office ie nonresidential use, re height, recession planes, car parks, removal of trees etc. These Zones must take account of the character of the area and protect this for the future.

One of the important questions is the process by which Zone descriptions would be developed for the inner city area. Councils need to consult with the successful current communities already living in these inner-city areas, many may even be close to the desired intensification, and consult before any zone descriptions are developed. These successful communities can help to inform other inner-city development. Ignoring the long-term residents and present stable community for some imaginary ideal future city dweller is forgetting that people living here attract others and by choice people want to live in stable long-term communities where people know their neighbours not crime ridden cesspools full of empty flats, commercial premises and transient residents.
Question 8. Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not?

I can see the value in making 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); sounds good however how its done can be the difference of thriving communities or future slums.

I understand that we need to prevent Christchurch’s spreading suburbia as it has done in recent years, eating into our green belt and causing traffic congestion, and that the aims are noble, intensification while still creating ‘high-quality, livable cities that contribute to the well-being of people and the natural environment’ (p14).

However intensification must be done with care, rather than simply an opportunity for developers to make more money while destroying areas amenity and counter intuitively having exactly the opposite effect to desired, by decreasing the number of permanent residents in the inner city.

I have noticed the unintended consequences of intensification in the Christchurch Central City residential areas already (requiring one dwelling for every 200m² to achieve the goal of 50 households per hectare). They include (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 vegie gardens (iv) proliferation of short-term accommodation, primarily AirBnB.

In the inner city these are in competition with hotels/motels and may be preventing the financing and much needed development in Christchurch. and (v) create a consequential reduction in number of permanent residents, the exact opposite of the desired effect to get more permanent inner city residents.

If height and recession plane rules are relaxed or removed, an existing resident could lose their access to sun and/or privacy in their garden or even in parts of their house. New residents could end up with little or no choice of housing type and therefore experience the same disadvantages. Christchurch central city residents already have experienced the effects of intensification. Some of the new builds are compromised in the same way and have been slow to sell in existing neighbourhoods. To work well, intensification must be well designed, taking the above into account. This can be done in new developments, but is difficult when built alongside existing dwellings.

Development of low cost (ironically still too expensive for low income), blocks of flats with poor sound insulated and at the minimum level of insulation, that ignore the importance of community is just developing future slums. The areas that are to be
intensified should have strict rules for green spaces, community spaces, mixed type housing, subsidized homes for essential govt workers, nurses, police and low income housing association etc. and should not be developing units in competition with commercial hotels while only paying for residential land values, while ignoring the housing requirements of essential low-income workers.

I strongly disagree with the statements in the document about height and height-to-boundary rules. The reasons are:

Firstly, limits on height and appropriate height-to-boundary rules recognise the importance of not being unreasonably shaded by a new development on a neighbouring property. Access to sunlight on your property is perhaps the most important aspect for continued enjoyment of your own property.

Secondly, ‘detached housing’ is the norm in most of Christchurch (mainly in the suburbs, but also in the central city), which the NPS acknowledges may need to be protected by height-to-boundary (recession plane) rules.

Thirdly, in post-quake Christchurch, there is a strong aversion to tall buildings. The new District Plan therefore allows no new development over 28 metres (about 7 stories) in the city centre and lower limits further out. Even in the city, when new builds could have used existing rights to go taller, they have chosen not to exceed 7 stories. Advantages of fewer tall building have included a reduction in the wind tunnel effect, more sun and light between buildings, a greater feeling of safety and a more human scale.

The District Plan does include a network of height limits (significantly increased in some areas from what was allowed before), giving plenty of scope for increases in density. Removing or relaxing these height limits would be unnecessary and unpopular.

If intensification of areas around ‘frequent public transport’ means a strip 800m wide on each side of the main high-frequency bus routes (Orbiter, Blue, Yellow, Orange, Purple routes), it probably covers more than half of the entire city of Christchurch. That means that most of Christchurch would be subjected to high density developments under the Prescriptive approach. This option fails to recognise that bus routes are different from railway stations, e.g. bus routes can and do change at short notice, whereas railway stations are more permanent. Bus stops (‘frequent public transport stops’) are therefore very poor indicators of where high-density developments should be concentrated.

Whatever changes are made under this NPS, I strongly urge government to take these consequences into account.
Question 11. Do you think that central government should consider more directive intervention in local authority plans?

P6C Option 1 (Descriptive approach) is much more appropriate than Option 2 (Prescriptive approach) Although the Central City area where I have lived and owned a property for over 25 years would be included in the high-density area under either of the two approaches, the Prescriptive option could have dire consequences for Christchurch as a whole. The Descriptive approach makes it possible that some parts of the Central City could be protected from the worst effects of unbridled intensification through the use of the Zone descriptions.

The ‘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. Any new development intensification should have homes with high green star energy ratings, include providing subsidised houses for essential workers and housing association etc, while providing areas for community development. This should be at the forefront of the intensification. This would only be possible under the Descriptive approach (p37, P6C Option 1).