Proposed National Policy Statement on Urban Development

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This submission is on behalf of the Avon Loop Planning Association.

This submission refers to Questions 7, 8 and 11 from the consultation document.

AIMS OF THE NPS
The aims sound good but the first three often are in opposition to the last one. Proposals could have major impacts on residential amenity and liveability, depending on how prescriptive they are.

URBAN AMENITY (pages 26-29)
The “urban village” is the basic building block of thriving cities. If you can create that village, you can get a healthy society. To break down the barriers in society, we need to live in housing that is appropriate for a wide variety of ages, singles, solo parents with children, blended families, and incorporating technology (e.g. electric cars). A desirable place to live is a place where you have local shops, local parks, supermarket, bars and cafes. The design means that people discover that they live in a community. It attracts people who want to live with these community values. Planning should focus on attracting a variety of people and mindful of organization that works to get people to mix. We know that isolation causes mental health problems in society. The best way to create community is to plan for communal space and land, with outlooks towards green space and sun.

REDUCING OR REMOVING HEIGHT & RECESSION PLANE RULES (pages 42-45)
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.

We strongly disagree with the statements in the document about height and height-to-boundary rules. Our reasons are:
1. 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.

2. “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.

3. 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.

To summarise:-
1. Limits on height and maintaining height-to-boundary (recession plane) rules are absolutely vital for protecting the amenity and liveability of residential areas—much more so than for any of the other proposals in this NPS.

2. Although other potential changes listed in the document (regarding site coverage, property size, outdoor space) also could have a negative effect on amenity, the effects would be less than those associated with height and recession planes—taken together, the other changes would give plenty of scope for increasing density. These two rules should therefore NOT be relaxed or removed by the NPS.

ZONE DESCRIPTIONS (pages 33-34)
The proposed approach looks much more detailed than similar policy-level statements in the current Christchurch District Plan (residential amenity and diverse dwelling types to attract a variety of residents, for example). However, previous experience with how higher-level objectives work in practice does not give us confidence that the Zone descriptions will provide any more protection or certainty to existing or new residents than previous attempts.

For example under the previous Christchurch District Plan, Special Amenity Areas (SAMs) were identified – one being in the Avon Loop area. However, unless Zone descriptions are clearly worded and supported by very clear rules, with more teeth than the ‘restricted discretionary’ or ‘discretionary’ rules have, we expect developers to work around them via departures re height, recession planes, car parks etc.

Zone descriptions ‘should be consistent with the National Planning Standards’ (p33), so it’s unclear just how much latitude local Councils would have to develop Zones where the worst effects of intensification could be mitigated. It’s difficult to assess the implications of this section of the NPS, but the impact of Zones will probably be significant. One of the important questions is the process by which Zone
descriptions would be developed. How much consultation? How much authority would Councils have? Would current residents within a Zone have any say?

INTENSIFICATION/HIGH DENSITY AREAS (pages 19-20 and 35-39)
1. The definition of ‘high-density’ in the Prescriptive approach is 60 residential units/hectare. Currently the Christchurch District Plan aims for 50/hectare, i.e. one dwelling for every 200m² came from. Those of us who live in the Central City already have experienced unintended consequences of intensification of this level within an existing neighbourhood.

We are familiar with unintended consequences of intensification in the Christchurch Central City residential areas (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 – excluding different groups in NZ society, e.g. physically disabled, ethnic groups with larger family groupings etc
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
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 consequences into account.

2. If ‘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.

This example shows why 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 or required. This would only be possible under the Descriptive approach (p37, P6C Option 1).

CONCLUSION:
P6C Option 1 (Descriptive approach) is much more appropriate than Option 2 (Prescriptive approach) for the reasons given above. Although the Central City (where most of us live and/or own property) 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 also 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.

Town planning is not town cramming.