Comments on: Proposed National Policy Statement on Urban Development
From Dave Kelly
Beckenham, Christchurch 8023
Phone

BACKGROUND

I work at the University of Canterbury. I currently live in my own house in suburban Beckenham, but 1986-2018 I lived in the Victoria area of the central city (in Beveridge St).

KEY POINTS

Q7. ZONE DESCRIPTIONS

The NPS-UD apparently relies mainly on these Zone Descriptions to ensure quality outcomes (rather than new slums) when other planning rules are relaxed. After 30 years experience living in the high density (currently 45 households per hectare) central city area of Christchurch, and being involved in many Resource Consent applications, I predict the Zone Descriptions are unlikely to be effective as they will be too vague. In my experience, waffle about pleasant outlooks or nice living environments cut no ice when a developer has a plan that is too tall, out of keeping with local building styles, and so forth. The only rules that had any effect at limiting loss of amenity were precise numerical ones about recession planes, numbers of non-residents who could work in a residential zone building, vehicle movements per day, etc.

If you are going to put a lot of weight on Zone Descriptions, you are going to have to work really, really hard to make them precise and enforceable. I don’t believe it will work.

Q8: AREAS FOR INTENSIFICATION

On page 37, two options are presented for which areas should allow higher density: “descriptive” which asks local bodies to identify areas such as near centres and transport hubs, and “prescriptive” which mandates this within 1.5 km of (shopping) centres and 800 m of public transport routes.

The problem is that the latter prescriptive approach would be grossly inappropriate for Christchurch. If applied to only an 800 m strip both sides of the trunk bus routes, about half the city, including many outer suburbs, would be included. The City Council has identified more than 130 malls and shopping centres of various sizes; a 1.5 km zone around all of those ropes in about 60% of the city. It’s a failure of planning to say that high density should be encouraged in certain key areas, when those key areas turn out to be nearly everywhere.

The prescriptive approach would also zone nearly all of the Beckenham Loop for high density, because of two nearby bus routes, when the Loop is overwhelmingly detached houses with families whose children attend the local school. It’s hard to see a suburb less well suited to the “no rules required” approach.

I consider that higher density is appropriate in key areas, but only local knowledge can work out where that should be. The City Council already has areas identified for higher density housing, clustered around carefully chosen shopping areas and some logical transport routes. This can only happen if the descriptive approach (P6C option 1) is followed.

Q11: HEIGHT AND RECESSION PLANES
I strongly disagree with the statements in the NPS-UD document about height and height-to-boundary (recession plane) rules being historical and saying they could be relaxed or removed. In fact those rules serve a vital current purpose.

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 my property is perhaps the single most important aspect for continued enjoyment of my 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 (on page 45) may need to be protected by height-to-boundary (recession plane) rules.

Thirdly, in Christchurch post-quake everyone developed an aversion to tall buildings. The new District Plan has a range of lowered height limits (compared to pre-2011), the tallest being 28 m (7 stories) in the central city to lower in the suburbs. People here don’t want to live or work in tall buildings, and removing height limits here isn’t going to change that, so developers are not building them even when they could (with existing use rights). So removing height limits wouldn’t have any useful effect anyway.

I don’t really mind the other proposals to allow higher density, as a neighbour’s cramped outdoor living space, lack of car parking, etc don’t affect me. But please, don’t let a neighbour block my sunlight.

I also point out that in most of Christchurch, the new District Plan (from 2017) increased the height limits and recession planes over much of the inner areas of the city, precisely to create more room for intensification which has not yet been realised, even keeping the current height limits and recession planes. Removing them at this stage would be simply premature and impatient.

**SUMMARY**

The “areas for intensification” rules in prescriptive form would apply higher density to 50-75% of the whole of Christchurch city. Deleting height and recession plane rules would remove any ability of residents to retain and defend the most important amenity value on their own property, access to sunshine. The combination of the two would create potentially widespread negative effects across most of the second largest city in New Zealand. You have to go for less extreme options in both cases.