Submission on
NATIONAL POLICY STATEMENT – URBAN DEVELOPMENT

This submission is made by the Christchurch Civic Trust, which welcomes the opportunity to comment on the proposed National Policy Statement on Urban Development (NPS-UD). We would like to say, however, that we think it is highly regrettable that the Ministry has allowed such a short space of time for people and groups such as ours to make submissions on this extremely complex and important matter.

At the outset we would like to comment that at this time, when climate change and environmental sustainability are at the forefront of attention, both national and international, a national policy statement on urban development must consider first and foremost the explicit and implicit environmental costs in any recommendations it makes.

The Christchurch Civic Trust has a long-standing concern for the quality of urban design and for the retention of the city’s built heritage and urban spaces. Hagley Park in Christchurch, which is a case in point, is constantly under the threat of encroachment and privatisation of the commons involving commercialisation.

The Trust has considered the impact the proposed statement will make with respect to the country’s heritage buildings and other buildings of importance, including character buildings; we believe that the NPS-UD has the potential to make radical and negative changes to the distinctive heritage character of sections of New Zealand urban environments.

Too often in New Zealand the demolition of existing buildings is seen as the only way to create higher density urban areas. The proclivity of developers for scorched-earth demolition of remediable buildings, heritage and other, needs to be replaced by a recognition of the need to “retain, restore, reuse”, given that a significant part of the world’s climate change problem is a direct result of the construction of the built environment. Cement manufacture alone accounts for about 8% of world CO2 production.
“The greenest building is the one standing”, a mantra often repeated by heritage advocates, means that the production of materials used in the construction of existing buildings has already wrought environmental damage. Unnecessary demolition means wasted energy, loss of the building’s embodied energy and waste removal of greenhouse gases production – all for a repeat of the building cycle: all environmentally irresponsible.

Other countries - including many European ones - deal with retention of heritage buildings in a more considered and constructive manner.

The Christchurch Civic Trust is concerned that the proposed NPS-UD may well undermine the protection of historic heritage from inappropriate development which is a matter of National Importance under section 6(f) of the Resource Management Act 1991.

The proposals put forth in the NPS-UD will require high-growth cities to make room for growth regardless of their present planning and rules designed to protect historic heritage from inappropriate development.

While the Christchurch Civic Trust is not opposed to development or intensification per se, it is strongly opposed to inappropriate development which threatens heritage protection and has the potential to destroy heritage buildings and important urban spaces in New Zealand cities. It is also opposed to feeding developers’ desire for growth at the expense of the environment (as explained above.)

The NPS-UD undermines the RMA’s existing standard by its use of the weaker term “reflecting” heritage in the scope of what constitutes a quality urban environment.

We advocate for all urban regeneration and green-field developments to consider the energy efficiencies of alternative design elements, taking into account energy consumed in alternative transport systems that serve those developments, with encouragement for use of renewable energy sourced as locally as possible. In addition we support protection for highly productive soils and avoidance wherever possible of covering those agriculturally productive soils with housing.

The Christchurch Civic Trust urges the Ministry of the Environment to produce a NPS-UD which acknowledges heritage in a much more positive and definitive manner and also ensures that future urban development is undertaken in a way that is as environmentally responsible as possible.

Christchurch Civic Trust

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