ICON - Inner City West Neighbourhood Association Incorporated
Christchurch 8140
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ICON is a Christchurch community/residents’ organisation, formed in the 1980s and formally incorporated in 1996, for the area bounded by the Avon River from Carlton Mill Road/Bealey Avenue to Cambridge Terrace, bounded on the west by Hagley Park/Botanical Gardens and on the east by the Avon River/Durham Street.

ICON had made many submissions to development proposals and district planning over the decades, having for example, major involvement in the 1975 plan developed through the Inner City Charrette, The Shape of Christchurch – within the frame of the 4 avenues¹). This current opportunity is welcomed, and, consistent with ICON submissions to District Planning over the decades, we submit the following responses to the National Policy Statement on Urban Development (NPS-UD) questions.

Q1. Do you support a National Policy Statement on Urban Development that aims to deliver quality urban environments and make room for growth? Why/Why not?

Are there 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?

ICON has long supported the need for a National Policy Statement on Urban Development, presuming this will promote better planning under a big-picture future-oriented framework, keeping the best of the past while planning for the future, as opposed to opportunistic, profit-oriented fragmented development.

ICON supports the concept of affordable/social housing, high quality public transport and alternative transport modes, in order make for more equitable, accessible and healthy communities within environmental and cultural restrictions.

Seeing ourselves as part of the city beyond the neighbourhood, ICON has always been concerned about the encroachment (urban sprawl) on highly productive land especially in Christchurch’s ‘green belt’. So, ICON supports the NPS-HPL policy direction to ensure that primary production potential is protected for primary production, and urges the need for future growth to be contained within urban boundaries. (This may require modification of the Urban Growth Agenda which might contradict the protection of versatile soils).

¹ A plan developed though the Inner City Charrette facilitated by Lucas Associates – landscape planners, for residents groups, retailers (ICPT) and professional organisations (HTP, NZIA, NZILA), instigated by the Civic Trust and supported by the Christchurch City Council
ICON has submitted on these matters in numerous District Plan consultations.

However, ICON advocates promotion and planning for quality urban environments, including livable and sustainable neighbourhoods in which protection of heritage, character, cultural institutions, and adequate open space are integral. We want cities built for citizens, for communities that last and live in and for the city as well as those who might commute (via high quality public transport links) to work in our city. We want our cities to enhance our lives, not just to be places to work and sleep in. Such urban development requires careful planning and monitoring that a good Regional Policy Statement - Urban Development should promote.

ICON finds aspects of this proposed NPS-UD disturbing, particularly as it seems despite some wording about things that contribute to a quality environment, and “quality urban environment” and “high-quality, liveable cities that contribute to the well-being of people and the natural environment,” there is insufficient clarity as to what quality is. Indeed, the proposed NPS-UD seems overly focused on growth to the detriment of the values that might make for quality in an urban environment and successful city.

Philippa Howden-Chapman and director of the New Zealand Centre for Sustainable Cities Professor of Public Health at the University of Otago (Wellington) has done much research particularly into european examples of sustainable and social housing with health and energy efficiency as outcomes of good design. This knowledge should be incorporated into guidelines.

What is a successful city? The proposed RPS-UD has insufficient analysis and direction as to what makes a successful city. For example, why, considering other Government priorities, is this RPS not framed by the objectives of building sustainable, liveable, healthy, low-carbon cities? And considering that even the Treasury has identified the importance of historic protection and cultural connectedness for the healthy wellbeing of the nation and its population, the NPS-UD must have stronger objectives and requirements for protecting these (C.f. also s.6(f) of the Resource Management Act 1991) beyond a statement in the preamble (page 27).

ICON recommends including objectives of sustainability, liveability, and low-carbon urban development and protection of historic heritage and character.

It is disappointing there is no evidence-based analysis or vision of what makes for “successful cities”. What are the examples were considered? The vision behind this NPS-RPS does not seem to be the likes of Paris or other much-loved European cities, with strict planning rules setting urban limits, heights, commercial spaces, enabling the design or retention of family homes and apartments, heritage and green space, cultural frameworks and institutions, and agricultural land, all connected by publically-funded highly efficient public transport that diminish car dependency. In such cities people live well, and businesses are attracted or evolve bringing jobs and prosperity

ICON submits that transport should be the defining tool to a quality urban environment and making room for growth.

In much research, high-quality transport is seen to be the key to densification rather than abandoning of rules in a way that could undermine success. To quote Jeff Kenworthy², Professor of Sustainable

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² Jeffery Kenworthy is Professor in Sustainable Cities at the Institute for Sustainability and Technology Policy at Murdoch University in Perth. He is best known for his international comparison of cities around the theme of automobile dependence. He has published extensively in the transport and planning fields for 26 years and is co-author with Peter Newman of Sustainability and Cities: Overcoming Automobile Dependence (1999) and The Millennium Cities Database for Sustainable Transport (2001) with Felix Laube. Address: Institute for Sustainability and Technology Policy, Murdoch University, Perth, Western Australia, 6150; e-mail: J.Kenworthy@murdoch.edu.au
Cities, Murdoch University, in his publication *The eco-city: ten key transport and planning dimensions for sustainable city development:

“Making existing cities and new urban development more ecologically based and liveable is an urgent priority in the global push for sustainability. This paper discusses ten critical responses to this issue and summarizes them in a simple conceptual model that places the nexus between transport and urban form at the heart of developing an eco-city. This involves compact, mixed-use urban form, well-defined higher-density, human-oriented centres, priority to the development of superior public transport systems and conditions for non-motorized modes, with minimal road capacity increases, and protection of the city’s natural areas and food-producing capacity.

These factors form the framework in which everything else is embedded and must operate, and if they are not addressed only marginal changes in urban sustainability can be made. Within this framework, environmental technologies need to be extensively applied. Economic growth needs to emphasize creativity and innovation and to strengthen the environmental, social and cultural amenities of the city. The public realm throughout the city needs to be of a high quality, and sustainable urban design principles need to be applied in all urban development. All these dimensions need to operate within two key processes involving vision-oriented and reformist thinking and a strong, community-oriented, democratic sustainability framework for decision-making.”

The importance of public transport contributing to New Zealand “success” has been analysed well in the work of its transport planners including Mark Bachels when working for Canterbury Regional Council.

ICON recommends that transport planning precedes densification planning in the UD-Strategy, with public transport and major public transport corridors being the key to growth.

ICON recommends that growth takes place along major transport corridors especially around commercial nodes but with discretion to retain urban village/communities

ICON recommends that growth on greenfields be on public transport links (especially rail) and on low quality (less productive) soils (following the example of the planned development of Rolleston in Canterbury) and green or brownfields developments should be designed as high-density high-liveability development. (In Christchurch, the Ngai Tahu development on the old Sunnyside Hospital site provides a notable example in terms of quality high-density development).

Any Urban Development Plan should spell out what makes a quality environment and ensure these factors have equal status with those allowing multiple buildings to be built on small patches of land. Features of quality urban environments include
- a ratio of buildings to open spaces, including spaces where people can meet neighbours
- numbers of trees and/or greenery per street or hectares
- maintenance of a quiet neighbourhood
- protection of heritage sites and structures
- accessibility to public transport

(accessibility to include frequency and the provision of stops that can be reached by a wide range of ages and abilities…for example in Christchurch a guideline has been that bus stops should be proved every 300m and that frequency is every 10 minutes on major bus routes 20 minutes at weekend, and 30 minutes on suburban routes.)

Planners could certainly improve on and expand such lay suggestions, provide acceptable allowable ranges and require measurable essential basics.

**ICON recommends that there are clearer definitions of what makes for quality urban environment:** e.g. per km access to green spaces and gatherings spaces; quality design criteria to be applied; family-consideration planning; access to public transport, education, cultural and recreation facilities; retention of heritage and character.

It is disturbing that in this RPS-UD there is no consideration of what contributes to city communities and the amenities and values that keep these together – indeed the proposed approach might well destroy the very things that make communities long-lasting and cohesive…the amenities, family homes, cultural institutions, and social fabrics built around the character and physical identities of neighbourhoods.

**ICON recommends that there is a clear objective of retaining and building communities and urban villages within the cities.**

**Q2. Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments? Why/why not?**

- Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?
- Can you suggest any alternative approaches for targeting the policies in the NPS-UD?

ICON supports the concept of a Regional Policy Statement – Urban Development, but does not think that this NPS-UD is appropriate at this time to Christchurch, nor to all other urban centres. Christchurch does not have a housing shortage, and has many empty houses including in subdivisions. There are empty sections in landbanks, as well as unrepaired and empty sections through-out earthquake-damaged Christchurch. There has been detrimental impact of high density developments on neighbourhood amenity and character. The lack of quality design has contributed to this as units remain empty. Other units are specifically built for, it seems, AirBnB and other short term renting. Such development does not contribute to communities and instead contribute to the housing shortage.

**ICON recommends direction for urban centres to monitor and restrict inappropriate short-term accommodation and limit unnecessary speculative development while sections are sitting in landbanks.**

**Q3. Do you support the proposed changes to future development strategies (FDSs) overall? If not, what would you suggest doing differently?**

- Do you support the approach of only requiring major urban centres to undertake an FDS? Would there be benefits of requiring other local authorities to undertake a strategic planning process?
- What impact will the proposed timing of the FDS have on statutory and other planning processes? In what way could the timing be improved?

ICON supports productive soils around all urban developments should be identified and protected from further urban sprawl and development.

As well, there should restrictions on any rural land high quality (productive) soils being built over in new developments. For example, around over the last four decades there has been subdivisions built in fragmented fashion across some very productive soils e.g. between the Main North Road to Rangiora or between Christchurch through Templeton and Halswell to Lincoln. Seemingly, district councils are/were seduced by the increase to the rating base and were not concerned by the acceleration in car dependence and infrastructure ramifications. This approach is not appropriate to sustainability and the capacity to produce food and textiles.
Q4. Do you support the proposed approach of the NPS-UD providing national level direction about the features of a quality urban environment? Why/why not?

- Do you support the features of a quality urban environment stated in draft objective O2? Why/why not?
- What impacts do you think the draft objectives O2–O3 and policies P2A–P2B will have on your decision-making?

ICON would support a direction for quality urban environments when quality urban environment is better defined and it is clear that intensification of development maintains a careful balance between what is inappropriate and appropriate development, and how amenity and heritage protection and local priorities and context are considered.

The simultaneous approach to all urban centres across New Zealand does not recognise local priorities and the New Zealand context of where there are pressures and where there is slack capacity. Work is needed to provide a framework of what is happening across New Zealand and the context for urban developments – including their transport linkages and the potential for improvements for these to provide for housing needs in different locations. For example, passenger rail services between Rangiora - Christchurch and Timaru – Ashburton - Christchurch could provide housing and stimulate prosperous economies in all these centres.

5. Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not?

- Do you think these proposals will help to address the use of amenity to protect the status quo?
- Can you identify any negative consequences that might result from the proposed objective and policies on amenity?
- Can you suggest alternative ways to address urban amenity through a national policy statement?

ICON would not support this approach and proposals, as dismissing current amenity allows for developers to destroy existing areas which provide amenity for those currently living there (or important natural areas or open space) under the guise of providing for different needs and future choices. ICON strongly opposes this. We, from the poorer to the better-off suburbs, have suffered enough already over the period of Christchurch earthquakes. Furthermore, it is important that while meeting housing demand, providing for businesses, and using land efficiently, to continue to protect historic heritage and natural areas from inappropriate development. These will serve future generations.

6. Do you support the addition of direction to provide development capacity that is both feasible and likely to be taken up? Will this result in development opportunities that more accurately reflect demand? Why/why not?

There have been difficulties with the existing NPS-UDS requiring establishing development capacity using economic modelling relating to projected population growth and current values. A better model needs to be found.

7. Do you support proposals requiring objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description? Why/why not?

- Do you think requiring zone descriptions in district plans will be useful in planning documents for articulating what outcomes communities can expect for their urban environment? Why/why not?
- Do you think that amenity values should be articulated in this zone description? Why/why not?

ICON supports this. Zoning provides protection across a variety of amenities. This approach provides for better choices in living instead of an approach that promotes all areas as if all residents had the same needs or interests or similar values for amenities.
Articulating the amenity values in zone descriptions would better ensure for cultural needs and/or protection of existing heritage and character which are usually valuable components of what would be considered “successful cities” elsewhere. Councils can then determine the contents of the policies, objectives and rules of those zones.

Some Zones would be much denser than others, with amenities developed to specifically serve such densification.

**Q8. Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not?**

- What impact will these policies have on achieving higher densities in urban environments?
- What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?
- If a prescriptive requirement is used, how should the density requirements be stated? (For example, 80 dwellings per hectare or a minimum floor area per hectare).
- What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?

**ICON supports** the descriptive approach, which tells councils that they need to provide more capacity for intensification, but leaves the details up to council, for reasons given in answering Q7 above.

**Q9. Do you support inclusion of a policy providing for plan changes for out-of-sequence greenfield development and/or greenfield development in locations not currently identified for development?**

- How could the example policy better enable quality urban development in greenfield areas?
- Are the criteria in the example policy sufficiently robust to manage environmental effects ensure a quality urban environment, while providing for this type of development?
- To what extent should developers be required to meet the costs of development, including the costs of infrastructure and wider impacts on network infrastructure, and environmental and social costs (recognising that these are likely to be passed onto future homeowners and beneficiaries of the development)? What impact will this have on the uptake of development opportunities?
- What improvements could be made to this policy to make development more responsive to demand in suitable locations beyond areas already identified for urban development?

**ICON strongly opposes this as it** undercuts protection of productive soils, encourages pressure on urban limits, allows for fragmented subdivisions with associated infrastructure costs and car dependence. The exceptions should be for planned settlements on low quality soils and on high-quality low-carbon transport links (like Rolleston being planned and built on an existing rail line). However these rail transport linkages should be simultaneously be developed for passenger services.

**Q10. Do you support limiting the ability for local authorities in major urban centres to regulate the number of car parks required for development? Why/why not?**

- Which proposed option could best contribute to achieve quality urban environments?
- What would be the impact of removing minimums in just high- and medium-density, commercial, residential and missed-used areas, compared with all areas of a major urban centre?
- How would the 18-month implementation timeframe impact on your planning processes?
- What support should be considered to assist local authorities when removing the requirement to provide car parking to ensure the ongoing management of car parking resources?

**ICON supports an integrated high quality transport system that reduces car dependency. Residential parking permit areas should be a feature of parking minimum reductions.**
Q11. Do you think that central government should consider more directive intervention in local authority plans?

- Which rules (or types of rules) are unnecessarily constraining urban development?
- Can you identify provisions that are enabling higher-density urban development in local authority plans that could be provided for either nationally or in particular zones or areas?
- Should a minimum level of development for an individual site be provided for across urban areas (for example, up to three storeys of development is a permitted activity across all zones)?
- Given the potential interactions with the range of rules that may exist within any given zone, how could the intent of more directive approaches be achieved?

ICON cannot speak for other cities, but in Christchurch we would most strongly oppose removing “height-to-boundary” (recession plane) rules in high-density zones as well as in neighbourhoods with detached housing (stand-alone) housing as the main built form.

Limits on height and maintaining these recession plane rules are crucially important in protecting amenity and liveability of residential areas. These protect neighbours from being unreasonably shaded by new developments. Access to sunshine is central to quality of life and particularly important in an aging population. The effect on mental health of permanent shading on one’s property is underestimated. In our area the few multilevel buildings allowed in previous district plans has produced anomalies, fragmenting the landscape, producing detrimental effects for neighbours and injecting strange isolated islands of residents/occupants which have not contributed.

ICON would also remind writers of NPS-UD that in Christchurch there are the continued concerns about height in our post-quake city. The new District Plans has set limits to height in the city. There are noticeable benefits to a lower more human-scaled city…with more sunlight on the streets, reduced wind-tunnel effects and greater warmth at street level encouraging walking. It is noticeable in liveable cities elsewhere that height limits of even just 4 stories provide for density in well designed apartments and terrace houses. Limits on height limits should reflect local context and needs and densification can be achieved without loosening all controls.

ICON also opposes removing the ability to set minimum house or apartment sizes, especially the latter) as in Christchurch we have observed an over provision of smaller flats and the subsequent departure of families (and others) from neighbourhoods.

Choices are reduced with monocultures of building type and size leading to a more transient population as people seldom desire continued living in cramped circumstances and move on, and families particularly do not find their needs met especially for room both inside and outside, and families particularly do not find their needs met especially for room both inside and outside, and the New Zealand way of life to have room for kids to play outside and to grow even a few vegetables is still sought after.

Some apartments are so small that it has been reported to ICON that one has to sit on one’s bed to shut one’s wardrobe door. In the long term we have observed that such apartments are being built or bought for AirBnB or only suit (or are the last resort) of transient workers. These as recipes for future slums. Instead we would advocate for good design rules for good liveability.

We would also advocate rules for protection and provision for small scale (limited-size) neighbourhood services like dairies, medical clinics, greengrocers, chemists, postshops, cafes and local tradesmen. These centres provide independence, meeting spaces, lifelines and livability in a community. They reduce car dependency and GHG emissions.

ICON is also concerned about increased site-coverage for reasons listed above (room for sunshine to reach properties room for kids to play outside, room for gardens especially fruit and vegetable self-sufficiency leading to reduced provision for long term residents and families.).

Standard rules should include at least:
- the land use activities included in each zone – residential zones must allow all
  residential forms, including multi-unit housing, boarding houses, and rental housing,
  and must allow small-scale neighbourhood services (as above)
- “bulk and location” standards – height limits, recession planes, site coverage,
  impervious coverage, front, side and rear yards, common wall rules, accessory
  building rules.
- performance standards – things like noise limits, and opening hours for work-from-
  home activities

Q12. Do you support requirements for all urban environments to assess demand and supply of
development capacity, and monitor a range of market indicators? Why/why not?

This seems appropriate.

Q13. Do you support inclusion of policies to improve how local government works with iwi, hapū and
whānau to reflect their values and interests in urban planning?

- Do you think the proposals are an appropriate way to ensure urban development occurs in a
  way that takes into account iwi and hapū concerns?
- How do you think local authorities should be directed to engage with Māori who do not hold
  mana whenua over the urban environment in which they now live?
- What impacts do you think the proposed NPS-UD will have on iwi, hapū and Māori?

Q14. Do you support amendments to existing NPS-UDC 2016 policies to include working with
providers of development and other infrastructure, and local authorities cooperating to work with
iwī/hapū? Why/why not?

ICON has not discussed this at any time so cannot comment, although it seems appropriate to our
Treaty Partnership.

Q15. What impact will the proposed timing for implementation of policies have?

Implementation should be timing to match with funding for high-quality Public Transport, at least in
Christchurch, which is still under great pressure for funds to continue post-earthquakes restoration.

Q16. What kind of guidance or support do you think would help with the successful implementation of
the proposed NPS-UD?

- Successful implementation of the proposed NPS-UD to produce more affordable housing
  and reduced car dependency will not be by removing unnecessary restriction on development,
  but by greatly improved high-quality public transport, better usage (AirBnB-dedicated
  buildings and apartments) and better design.

- The high quality public transport requires major central government funding…the kind of
  Government funding that has been poured into Roads of National Significance in previous
  years. Christchurch needs assistance to redevelop high quality public transport including rail
  services to outlying urban centres.

- Support for protection and restoration of built heritage is also required. Heritage New
  Zealand needs strengthening to support this.

Q17. Do you think there are potential areas of tension or confusion between any of these proposals
and other national direction? If so, please identify these areas and include any suggestions you have
for addressing these issues.

Q18. Do you think a national planning standard is needed to support the consistent implementation of
proposals in this document? If so, please state which specific provisions you think could be delivered
effectively using a national planning standard.

There are contradictions with the protection of highly productive land and the Urban Growth Strategy.
Such inconsistencies need to be addressed. END