Submission on Urban Development Proposals

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This is an Individual submission

Support in part

The reason I am not using the template is that my concerns relate to significant omissions in the document/proposed policy.

Quality

My main concern is the pronouncements about the importance of quality environments are all fluff and no substance. This aspect is given no legal status, nor is any measure of quality provided. As we all know if it isn’t legal and can’t be measured it will be neglected and may well be overridden by planners and developers advancing intensification.

The first 2 points of your Summary flyer (p4) say the Policy Statement

1. describes the kinds of features that make a quality environment
2. clarifies what is meant by amenity in urban environments

However, P 27 of the full document says

quality is important and needs to be spelled out in the preamble but goes on to say

The preamble would not have legal weight, but aims to explain the intent of the NPS-UD.

How can this work? If factors that make for good quality living are not quantified and have no legal status, surely a city could end up all wall to wall buildings and concrete? This plan reads like a shonky developer’s dream.

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
- what makes a quiet neighbourhood
- protection of heritage sites and structures

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

Public Transport Corridors
The plan rightly says new developments should occur near transport corridors but Christchurch city has an ineffectual bus service and has had no recent investment by government to develop fast, frequent public transport. And you cannot get rid of parking spaces until we do have this.

P 37 says
District plans must:

zone for high-density residential activities within an 800m walkable catchment of centres and frequent public transport stops.

But there is no definition in the appendix of frequent. It is essential this is added as frequent can mean once in 3 hours or once every ten minutes.

My understanding is that planners can tell what makes a public transport system succeed and make people change their habits.

Summary of my recommendations
This Policy Statement should reflect government’s fundamental principle of wellbeing and show how it will advance the wellbeing of New Zealanders. Thus the plan should

1. Describe major features of quality urban environments
2. Be specific about minimum requirements for quality urban environments
3. Give these features legal status equal to the rest of the intensification requirements
4. Define regular public transport eg how often the public transport should come to make a system work; its suitability for the old and the frail.