Question 1 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?
Somewhat
NOTES:
Our Association supports a NPS-UD aimed at delivering quality urban environments that plan for growth and supports livable cities, we must be careful that the aims are approached holistically taking into consideration the existing communities, the environment and the character and amenity of existing neighbourhoods.

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?
NOTES:
These aims should be supported in the current RMA and consenting provisions.

Targeting Cities that would benefit most page 18
Question 2 Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments? Why/Why not?
Somewhat
NOTES:
We support the approach of targeting the most direct policies to our largest and fastest growing urban environments. However it cannot be prescriptive, Christchurch for example has its own unique landscape mostly due to post earthquake opening or greenfields leaving ample available land in the central city, we would have to be very careful in applying blanket rules to all centres as our central city cannot afford to be allowed to be undeveloped in favour of more greenfields being made available.

Do you support the approach used to determine which local authorities are categorised as major urbans centres? Why/WHY not?
NOTES:
A one size fits all approach is not desirable nor workable in Christchurch due to our unique post earthquake environment and lack of current structure transport systems. A Descriptive approach is more appropriate in Christchurch than a Prescriptive approach.

Can you suggest any alternative approaches for targeting the policies in the NPS-UD?
NOTES:
No
Future Development Strategy page 20

Question 3 Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?

Somewhat

NOTES:
We support the proposed changes, but consider three yearly reviews to be unrealistic both in cost for the local authorities and in time for the communities to engage in the process of review.

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?

NOTES:
NA

What impact will the proposed timing of the FDS have on statutory and other planning processes? In what ways could the timing be improved?

NOTES:
As above

Describing quality urban environments page 25

Question 4 Do you support the proposed approach of the NPS-UD providing national level direction about features of a quality urban environment? Why/Why Not?

Somewhat

NOTES:
We do not support a national direction about features of a quality urban Environment, Christchurch is unique in its heritage, post earthquake landscape including the loss of character areas. Maintaining what we have left must be able to be considered locally and cannot be determined at a national level.

Do you support the features of a quality Urban Environment stated in draft objective )@)? Why/why not page 26

NOTES:
No - If the amenity of existing residents is likely to be compromised then it is highly likely it will all so impact the new residents. There is also an assumption that the current residents in the targeted areas are all wealthy with large houses and big cars, this is not always the case in our suburb and the increase in high density is resulting in the loss of amenity and livability for your average New Zealander who go to make up community. A blanket national approach will further break down this sense of community and well being.

What impacts do you think the draft objectives )@)
# and policies P@A-P@B will have on decision-making page 26

NOTES
We run the risk of losing local decision making and decisions that are made to not with.

Amenity Values in Urban Environments page 27
Question 5 Do you support the inclusion of proposals to clarify the amenity values are diverse and change over time? Why/Why not?
Somewhat
NOTES:
We agree that amenity values change over time but these changes should not be at the detriment of current residents and sense of community. Communities should be able to have a mechanism in which they can help plan their futures where possible.

Do you think these proposals will help to address the use of amenity to protect the status quo?
NOTES:
NA

Can you identify any negative consequences that might result from the proposed objectives and policies on amenity?
NOTES
As above if the amenity of existing residents is compromised then it is likely to impact on new residents as well

Can you suggest alternative ways to address urban amenity through a national policy statement?
NOTES:
No it has to have a locally determined factor

Ensuring Plan Content provides for expected levels of development page 31

Question 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?
Somewhat
NOTES:
NA

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?
NOTES
AS above
Do you think that amenity values should be articulated in this zone description? Why/Why not?
NOTES
In some instances, consultation is required in developing the zones.

Providing for intensification page 33

Questions 8 Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/Whynot? Page 53 for timing
Somewhat

NOTES:
Intensification in the central city and transport links is desirable, a prescriptive approach on areas where high density may be required could open up the whole of Christchruch to high density development with a one size fits all approach, removing provision for design standards to maintain regional differences. We do not support the removal of recession plane requirements.

What options do you prefer for prescribing locations for intensification in major urban centres? Why?
NA

NOTES:
Local knowledge and consultation

If a prescriptive requirement is used, how should the density requirement be stated? Please provide a suggestion below (for example, 80 dwellings per hectare, or a minimum floor area per hectare
NOTES
We do not support a prescriptive approach

What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?
NOTES
The loss of amenity and consultation of existing residents, potential loss of heritage areas.

Providing for further greenfield development page 36

Question 9 Do you support inclusion of a policy provision for plan changes for out of sequence greenfield development and/or greenfield development in location not currently identified for development?
Position
NOTES:
As previously stated Christchruch is in a unique position where there is a large amount of undeveloped land in the central city and allowing out of sequence greenfields to be developed would come at the detriment of the central city.

How could the example policy better enable quality urban development in greenfield areas page 37
NOTES
Policy around greenfields must be unique to each location
Are the criteria sufficiently robust to manage environmental effects to ensure a quality urban environment, while providing for this type of development? Page 37

NOTES:
The policy is at odds with the proposal for more urban sprawl yet the protection of highly productive land.

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/beneficiaries of the development? What impacts will this have on the uptake of development opportunities.

NOTES:
If a development places more load on infrastructure and loss of amenity to the community in which it is inserting its development then they should be responsible for all the costs and the replacement of amenity in another form i.e park, greenspace, public art work etc

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?
NOTES
Localised consultation

Removing minimum car parking requirements page 39
Question 10 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?
NO
NOTE:
We do not support major local authorities ability to regulate the number of car parks required for a development being limited. In particular in Christchurch the relationship between good public transport and car parking requirements is a big issue. We already experience some streets in Richmond that are congested.

What proposed option could best contribute to achieving quality urban environments?
NOTES:
The ability to address the issues locally to achieve quality urban environments

What would be the impact of removing car park minimums in just high- and medium density commercial residential and mixed use areas compared with all areas of a major urban centre?
NOTES:
Public Transport options need to be considered

How would the 18 month implementation timeframe impact on your planning processes?
NOTES
NA

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?
NOTES

Relationship to public transport systems

More directive intervention to enable quality urban development page 41

Question 11 Do you think central government should consider more directive intervention in local authority Plans?

NO

NOTES

There must be room for local areas to decide for themselves the development of the urban environments.

Which rules (or types of rules) are unnecessarily constraining urban development?

NOTES

Height and recession plane rules must be considered in good urban design for the existing residents and new residents. Limits on height and recession plane rules are essential to protecting the amenity and liveability of residential areas. We see access to sunlight as vital to the health and wellbeing of the residents of our suburb.

Can you identify provisions that are enabling higher density urban development in local authority plans that could be provided for whether nationally or in particular zones or areas?

NOTES

NA

Should a minimum level of development for an individual site to be provided across urban areas (for example, making up to three storeys of development a permitted activity across all residential zones)?

NOTES

NO

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?

NOTES

Firm rules around some essential things such as noted above regarding height limits and recession planes.

Using market information to make decisions page 45

Question 12 Do you support requirements for all urban environments to assess demand and supply of development capacity, and monitor a range of market indicators why whynot?

yes

NOTES:

Market indicators will inform sound decision making
Questions 13 Do you support inclusion of policies to improve how local government works with iwi hapu and whanau to reflect their values and interests in urban planning? Why why not?
YES
NOTES:
We support this view and note it should include policies to improve how local government works with all its citizens to reflect their values 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 hapu concerns?
NOTES
As above

How do you think local authorities should be directed to engage with Maori who do not hold mana whenua over the urban environment they are currently living in?
NOTES
NA

What impacts do you think the proposed NPS will have on IWI hapu and Maori
NOTES:
NA

Coordinated planning page 50
Question 14 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 iwi Hapu?
NA
NOTES:

Timing page 53
Question 15 What impact will the proposed timing for implementation of policies have?
NOTES
There is not enough time for local councils to provide proper consultation with their communities.

Guidance and implementation support 55
Question 16 What kind of guidance or support do you think would help with successful implementation of the proposed NPS-UD?
NOTES
In Depth conversations with local communities

Alignment with other National Direction under the RMA page 57
Questions 17 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 below and include any suggestions you have for addressing these issues
As previously mentioned Christchurch has a unique landscape and already has an unusual post earthquake legislation in place, this will create confusion if both are to remain. If the rules in the Final policy are not clear we believe it may create confusion with existing RMA and district Planning rules.

Questions 18 Do you think a national planning standard is needed to support the consistent implementation of proposals in the document? if so please state which specific provisions you think could be delivered effectively using a national planning standard

NO

We already see how the current RMA impacts on our DP negatively, another national planning standard that takes a universal approach and does not allow for the diverse local needs will result in more confusion