To: Ministry of Housing & Urban Development/Ministry for the Environment
Submission: Proposed National Policy Statement on Urban Development (NPS-UD)
with reference specifically to Q7/Q8/Q11 in the consultation document.

AIMS OF THE NPS

• Make housing more affordable and reduce car dependency by increasing residential density in areas near city centres and transport corridors (‘making room for growth’ and ‘removing unnecessary restrictions on development’, p8);

• Change the focus from the needs/wishes of existing residents to those of possible future residents and developers (p29 & 35-36);

• ‘Allow growth up and out’ (p14);

• But (according to the document) to do the above while still creating ‘high-quality, liveable cities that contribute to the well-being of people and the natural environment’ (p14).

My comment: These aims are laudable, but from my experience the last often loses to the first three. The “one size fits all” proposals will have negative impacts in Christchurch, depending on: how prescriptive they are, and whether or not they take into account existing amenity, liveability and viability of adjacent residential properties and communities in our “Garden City”.

The possibilities range from (i) encouraging local councils to change their District Plans to facilitate higher density through to (ii) imposing rules that all Councils must follow.

Further the proposals remove the option of experienced existing residents to retain fundamental high quality liveable enclaves within the city, especially around “blue sky access”, “ground level sightlines and vistas beyond the 2.3m wall”, and viable relatively “long term neighbourhood relationships”, all of which I have seen eroded in the recent changes within the Christchurch inner city. Just one instance is the unintended consequences of intensification in the Christchurch Central City residential areas (requiring one dwelling for every 200m² to achieve the goal of 50 households per hectare). They include

(i) less variety in size and type of dwelling
(ii) fewer families and long-term residents because of the type of dwellings and/or lack of outdoor space
(iii) fewer trees or vegie gardens (Destruction of “The Garden City”,)
(iv) proliferation of short-term accommodation, primarily AirBnB and
(v) a consequential reduction in number of permanent residents in some neighbourhoods.
(vi) development of alternative use options for former “residential dwellings”

Whatever changes are made under this NPS – Urban Development document, I strongly urge government to take these consequences into account because I know what happens when the cohesion of an inner-city neighbourhood amenity is destroyed by “market drivers” rather than “social drivers”.
URBAN AMENITY pages 26-29; (see also discussion re intensification, pages 35-37)

One of the proposals is to change how urban amenity values are defined—a shift from the status quo and a focus on the amenity, happiness and wellbeing of current residents to the potential future benefits to people who don’t live there yet and the wider community (p 26, 28-29 & 35-36).

My comment: Many developers are driven by short term market opportunities rather than long term social cohesion. If ‘amenity’ and ‘liveability’ are compromised for current residents, it’s likely they will be compromised for new residents as well. It also assumes that current residents in the targeted areas are all wealthy. This is far from the truth … the socio-economic-demographic mix that is already achieved in our neighbourhood is what these proposals may destroy. Urban amenity and coherence only align when there is a consensus between current and future users and by rules that ensure amenity.

REDUCING OR REMOVING HEIGHT & RECESSSION PLANE RULES (pages 42-45)

Pages 42-45 of the NPS look at how higher density could be achieved by reducing or completely removing rules that ‘constrain urban development’.

My comments:

Central Christchurch has already undergone major changes in these rules and regulations. A lot of individual households have made new investment decisions based on their understanding of the new CCR (Central City Residential) regulations; to change them again brings another whole round of uncertainty and new economic risk to what have often been quite brave “good of the community” choices to stay, box on and commit to inner city recovery. The NPS’ directive to increase housing density in the inner city “brownfields” is also laudable, especially if it reduces encroachment on “greenfields” beyond the city limits.

But!

If height and recession plane rules are relaxed further or removed, an existing resident could lose their access to “blue skies” sun and/or privacy in their garden or even in parts of their house. New residents could end up with little or no choice of housing type and therefore experience the same disadvantages. Christchurch central city residents already have experienced the effects of intensification. Some of the new builds are compromised in the same way and have been slow to sell in existing neighbourhoods. To work well, intensification must be well designed, taking the above into account. This can be done in new developments but is difficult when built alongside existing dwellings.

It is even more important in Christchurch where so many houses/dwellings/places to live were broken in the earthquakes. There is no point in talking about increasing urban density if land that used to have houses on it is redesignated for “other uses” – churches, carparks, hotels, social service hubs, private medical facilities, professional rooms, short term accommodation. The NPS must ensure that it regulates to protect “residential land” for residential purposes, thereby increasing the number of dwellings, increasing density and building neighbourhood coherence.

I strongly disagree with the statements in the “one-size fits all” document about height and height-to-boundary rules. My reasons are:

(i) In Christchurch, access to sunlight on your property is perhaps the most important aspect for continued enjoyment of your own property.

(ii) ‘detached housing’ is the norm in most of Christchurch (mainly in the suburbs, but also in the central city), which the NPS acknowledges may need to be protected by height-to-boundary (recession plane) rules.
in post-quake Christchurch, more sun and light between buildings, a greater feeling of safety and a more human scale with detached housing is preferred, as shown by the number of homes that have been repaired/reinstated to that preference.

Residential land-use in Christchurch is not being optimised because former land containing dwellings is not being retained for that purpose — rather it is being redesignated for “more cost effective” commercial use options, undermining neighbourhood cohesion.

Our District Plan does include a network of height limits (significantly increased in some areas from what was allowed before 2015), giving plenty of scope for increases in density. Removing or relaxing these height limits would be unnecessary and unpopular.

I reiterate:

1) limits on height and maintaining height-to-boundary (recession plane) rules are absolutely vital for protecting the amenity, liveability and cohesion of residential areas in central Christchurch — much more so than for any of the other proposals in this NPS and

2) although other potential changes listed in the document (regarding site coverage, property size, outdoor space) also could have a negative effect on amenity, the effects would be less than those associated with height and recession planes—taken together, the other changes would give plenty of scope for increasing density.

3) intrusions into residential land use for commercial, and wider community services must be rigorously regulated if increased urban density and neighbourhood coherence is to be a realistic aim of the NPS – Urban Development for Christchurch.

These height and recession plane and land use rules should NOT be relaxed or removed by the NPS – Urban Development. Regulations that preserve existing land use in Christchurch for residential dwelling purposes should be retained and reinforced.

ZONE DESCRIPTIONS (pages 33-34)

My comment: The rules, standards and assessment criteria in the current district plans (which have much greater impact than the objectives/policies) often do not support what is envisioned by the objectives and policies. The proposed approach looks much more detailed than similar policy-level statements in the current Christchurch District Plan (residential amenity and diverse dwelling types to attract a variety of residents, for example).

I have lived in three Special amenity Areas (SAM’s) during the forty plus years I have lived in Central Christchurch. Unless Zone descriptions are clearly worded and supported by very clear rules, with more teeth than the ‘restricted discretionary’ or ‘discretionary’ rules have, developers usually find ways to work around them via departures re height, recession planes, car parks, land use variances, etc.

It’s unclear just how much latitude local Councils would have to develop Zones where the worst effects of intensification could be mitigated. How much power will local authorities have to retain undiluted neighbourhoods and hubs of residency. My own experience suggests that cost considerations (rather than amenity and neighbourhood cohesion values) tend to prevail. That is why a “one size fits all” solution will not work in Christchurch, even if the new proposals will alleviate some of Auckland’s problems.

It is worth noting that urban rules were successfully invoked to stop the reclassification of the S38 demolished Cranmer Court residential complex into a church use. The Majestic Church has taken an option to use old warehouse land and Cranmer Gardens is slowly arising out of the rubble. But, the same cannot be said for the multiple (much more) affordable housing options further up the road now used by the Casino nor the multiple dwellings on land now occupied by the Citadel with its two “lip-service” flats.
INTENSIFICATION/HIGH DENSITY AREAS (pages 19-20 and 35-39)

Some proposals are targeted at ‘major urban centres (Auckland, Hamilton, Tauranga, Wellington, Christchurch, Queenstown’: p19). Other proposals would apply to all local authorities.

In urban centres, the NPS would require ‘higher-density’ or ‘high-density’ housing near city centres and mass transit systems. Crucially, two options are given (p37).

My comments: The one-size fits all NPS solution to High Density and Intensification is an Auckland solution rather than a Christchurch one. It is too intense and will disrupt the fabric of the city. At least the Descriptive option can give the local council some discretion.

The current Christchurch District Plan aims for 50/hectare in high density areas, which is where the “Gerry Brownlee one dwelling for every 200m² idea came from. Those of us who live in the Central City already have experienced unintended consequences of intensification of this level within an existing neighbourhood. 60 residential unit/hectare is inappropriate across half the The Garden City.

If ‘frequent public transport’ means a strip 800m wide on each side of the main high-frequency bus corridors (Orbiter, Blue, Yellow, Orange, Purple routes), most of central Christchurch would be subjected to high density developments under the Prescriptive approach. This option fails to recognise that bus corridors are different from railway corridors and stations.

The Christchurch City Council should have the authority to decide where high- or higher-density living should be encouraged or required. The Descriptive approach (P6C Option1) presents that opportunity and obviates the “one size fits all” prescriptive option.

Please contact me if you wish to discuss anything arising from this submission.

David Chambers