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).

These aims sound good, but from our experience the first three often are in opposition to the last one. The proposals could have major impacts on residential amenity and liveability, depending on how prescriptive they are. 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. We are familiar with unintended consequences of intensification in the Christchurch Central City residential areas (requiring one dwelling for every 200m$^2$ 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 (iv) proliferation of short-term accommodation, primarily Airbnb and (v) a consequential reduction in number of permanent residents in some neighbourhoods. Whatever changes are made under this NPS, we strongly urge government to take these consequences into account.

URBAN AMENITY (pages 26-29; 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).

This appears to be a coded way of saying developers should have the right to make life worse for locals for the benefit of less well-off people who might move into the area if cheaper houses and flats were built. The outcome of the shift might be as stated, but 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, live in expensive houses and use cars as the sole mode of transport.
REDUCING OR REMOVING HEIGHT & RECESSION PLANE RULES (pages 42-45)

If height and recession plane rules are relaxed or removed, an existing resident could lose their access to 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.

We strongly disagree with the statements in the document about height and height-to-boundary rules. Our reasons are:

Firstly, limits on height and appropriate height-to-boundary rules recognise the importance of not being unreasonably shaded by a new development on a neighbouring property. Access to sunlight on your property is perhaps the most important aspect for continued enjoyment of your own property.

Secondly, ‘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.

Thirdly, in post-quake Christchurch, there is a strong aversion to tall buildings. The new District Plan therefore allows no new development over 28 metres (about 7 stories) in the city centre and lower limits further out. Even in the city, when new builds could have used existing rights to go taller, they have chosen not to exceed 7 stories. Advantages of fewer tall building have included a reduction in the wind tunnel effect, more sun and light between buildings, a greater feeling of safety and a more human scale.

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

There needs to be a very strong policy & rule/s in place that protect land zoned residential from non-residential intrusion. In our neighbourhood alone, we have lost many residences & potential residents to non-residential use such as car parks, large developments like Presbyterian Services and Salvation Army, potential loss to other developments such as the Youth Hub. Also smaller intrusions such as former Hearing Assn building on Beveridge Street.

ZONE DESCRIPTIONS (pages 33-34)

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). However, previous experience with how higher-level objectives work in practice does not give us confidence that the Zone descriptions will provide any more protection or certainty to existing or new residents than previous attempts. Remember the Special Amenity Areas—SAMs? Unless Zone descriptions are clearly worded and supported by very clear rules, with more teeth than the ‘restricted discretionary’ or ‘discretionary’ rules have, we expect developers to work around them via departures re height, recession planes, car parks etc.

We also note that Zone descriptions ‘should be consistent with the National Planning Standards’ (p33), so it’s unclear just how much latitude local Councils would have to develop Zones where the worst effects of intensification could be mitigated. It’s difficult to assess the implications of this section of the NPS, but the
impact of Zones will probably be significant. One of the important questions is the process by which Zone
descriptions would be developed. How much consultation? How much authority would Councils have? Would
current residents within a Zone have any say?

INTENSIFICATION/HIGH DENSITY AREAS (pages 19-20 and 35-39)

There are 2 issues of concern here - Firstly, the definition of ‘high-density’ in the Prescriptive approach is 60 residential units/hectare. The current Christchurch District Plan aims for 50/hectare, which is where the one
dwelling for every 200m² 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.
Secondly, if ‘frequent public transport’ means a strip 800m wide on each side of the main high-frequency bus
routes (Orbiter, Blue, Yellow, Orange, Purple routes), it probably covers more than half of the entire city of Christchurch. That means that most of Christchurch would be subjected to high density developments under the
Prescriptive approach. This option fails to recognise that bus routes are different from railway stations, e.g.
bus routes can and do change at short notice, whereas railway stations are more permanent. Bus stops
(‘frequent public transport stops’) are therefore very poor indicators of where high-density developments
should be concentrated.

This example provides a good argument of why the ‘one size fits all’ approach of the NPS is not workable. The
Christchurch City Council should have the authority to decide where high- or higher-density living should be
encouraged or required. This would only be possible under the Descriptive approach (p37, P6C Option 1).

I strongly believe P6C Option 1 (Descriptive approach) is much more appropriate than Option 2 (Prescriptive
approach) for the reasons given above. Although the Central City (where most of us live and/or own property)
would be included in the high-density area under either of the two approaches, the Prescriptive option could
have dire consequences for Christchurch as a whole. The Descriptive approach also makes it possible that
some parts of the Central City could be protected from the worst effects of unbridled intensification through the
use of the Zone descriptions.