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Christchurch City Council submission on the *National Policy Statement on Urban Development*

Thank you for the opportunity to comment on the proposed National Policy Statement on Urban Development (NPS-UD).

The Council agrees with and supports the Government's focus on successful cities. However, we have a number of concerns with what is being proposed and the process being used to make these changes. The very tight timeframe for this consultation, combined with the fact that is taking place directly prior to the local body elections, is extremely disappointing to the Council.

Our feedback is attached to this letter and includes general comments and covers the draft objectives and policies and responses to the consultation questions. The Council's feedback particularly highlights issues around:

- the lack of a vision for urban NZ as a network of interconnected cities and towns;
- the need for much clearer direction on what constitutes a quality urban environment;
- the need to properly consider local priorities and context and thus lessen the directive nature of the proposed policies;
- the inconsistency of the proposed policies on greenfield development with the rest of the NPS-UD and with the draft NPS on Highly Productive Land;
- the lack of consideration of climate change imperatives; and
- the potential costs to local authorities.

These are all matters of significant concern to the Council.

The Council looks forward to working with the Government on making cities such as Christchurch even more successful. We thank you for the opportunity to provide this submission.

For any clarification on points within this submission please contact David Falconer, Team Leader – City Planning, at david.falconer@ccc.govt.nz.

Yours sincerely



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Mayor of Christchurch

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APPENDIX 1: Christchurch City Council submission on the *National Policy Statement on Urban Development* - key submission points

Introduction

1. Whilst Council agrees with the Government's focus on successful cities, the Council has a number of concerns with what is being proposed and the process being used to make these changes. The main points we would like to discuss in this submission are:
 - Concerns about the **process and the timing** of the consultation – the reduced timeframes and consultation occurring directly prior to the local body elections.
 - A more **comprehensive vision of Aotearoa/New Zealand** as a network of interconnected cities and towns is required, with associated objectives and policies requiring infrastructure provision to support this.
 - Better direction is required on what constitutes a **quality urban environment**, because the proposed NPS-UD does not give clear direction on what this is.
 - The need to consider local priorities and the unique circumstances of each major urban centre, as **one solution will not work for all** – the proposed NPS-UD does not currently achieve this.
 - **Less directive policies are preferred** as there is a need to consider local priorities and context, which such an approach does not encourage.
 - The NPS-UD is likely to require **greater intensification** than what is enabled in Christchurch's recently-developed District Plan, without considering the lack of demonstrable need for this additional capacity, local priorities specific to Christchurch, and the potential impact on neighbourhood amenity.
 - **The policies around out-of-sequence greenfield development** are too directive, inappropriate for application on a national scale, and are not consistent with the National Policy Statement on Highly Productive Land nor the evidence-based, plan-led ethos of the rest of the NPS-UD.
 - The **costs for local authorities** of the extra requirements of the NPS-UD will need to be addressed through consideration of funding tools available to local government, and funding from central government.
 - Without more central government funding and support to achieve a transport mode shift and significantly better public passenger transport, the **removal of all parking requirements** will result in negative consequences, especially in terms of parking spill over and access for the disabled and service providers.
 - The document should give greater consideration to the **effects of climate change** on the urban environment, and how urban environments can support a low-carbon economy.
 - **Community involvement** in urban planning needs to be factored into the draft NPS-UD, and more clearly provided for. This includes community involvement in the discussion about intensification, and the need to consider the diversity and character of neighbourhoods.

General government aims described in the discussion document

2. The Council agrees with the Government's focus on successful cities, and that the success of New Zealand's cities will affect New Zealand's overall economic, social, and cultural performance. Improving the way our towns and cities function is also critical to supporting

and fostering healthy local communities. The Council supports the objective of the Urban Growth Agenda, to improve housing affordability (underpinned by more affordable urban land), and along with this improve the choices for the location and type of housing, and access to employment, education and services; assist emission reductions and build climate resilience; and enable quality built environments, while avoiding unnecessary urban sprawl. These objectives are already embedded in the Christchurch District Plan, the Council's strategic framework, and other Council strategies and infrastructure planning documents. They are also part of good planning practice. The Council has had a successful record over several decades, in managing urban growth.

Timing and consultation

3. The Council is disappointed at the very tight timeframes for providing a submission on the proposed NPS-UD, and that the consultation is occurring directly prior to the local body elections. This restricts the ability for the Council and its communities to provide feedback on this document.
4. The Council notes that the implementation of the policies contained in this document for communities in Christchurch could be very significant. However, there is limited potential for targeted engagement with affected communities built into the process, particularly the communities that might be identified for higher density development under P6C Option 2 in the discussion document. We submit that the process would benefit from more meaningful engagement with these communities.

One-size-fits-all approach

5. The Council strongly believes that a one-size-fits-all solution across New Zealand's six major urban centres will not achieve the best outcomes for our cities. The objectives and policies in the proposed NPS-UD appears to be an approach that is better suited for cities that have an identified housing shortage, such as Auckland. Christchurch City does not have a housing capacity issue. This was demonstrated in Christchurch's first Housing Land Capacity Assessment in 2017/18 and in its Future Development Strategy 2018-2048 "Our Space", undertaken with adjoining councils. It is also evidenced by the government recently announcing its intention to sell all 75 Kiwibuild houses in Canterbury due to lack of demand.
6. Christchurch has other important, localised issues that inform our priorities. These include: addressing and mitigating the effects of natural hazards and climate change; regeneration of the Central City; restricting greenfield expansion to reduce transport costs, emissions and impact on versatile soils; transitioning to a low-carbon urban environment; and supporting growth and public transport corridors. The fact that local centres across New Zealand will have differing priorities should be properly considered in the finalised NPS-UD.
7. Christchurch's Central City is still very much in recovery mode and has not yet managed to attract the necessary critical mass of visitors, workers and residents needed to sustain a vital and viable Central City. The Central City lost around 23,000 workers, 3,000 residents, and 140,000sqm of retail floor space as a result of the earthquakes and its recovery remains of the utmost importance to our City. We are still well short of our aspirational regeneration targets of 60,000 workers and 20,000 residents in the central city; this is our immediate focus and where we suggest greater central government support ought to be directed. Any national policy direction that facilitates significant unplanned and dispersed growth outside the

Central City may undermine not only our priority earthquake recovery objectives, but the significant amount of public and private investment in the Central City to date.

Costs

8. The Council is concerned about the costs of the process changes needed to implement the draft policies and objectives. The Council found it costly and onerous to implement the National Policy Statement on Urban Development Capacity, and the NPS-UD continues to impose similar requirements on major urban centres. It may even be more costly to implement since it contains additional requirements such as that of assessing the amount of development that will likely be taken up (O5 and P4A refers). This goes further than the previous feasibility assessment and will be difficult to determine as it is to some extent subjective. It is impossible for councils to have certainty regarding the eventual housing typology and costs of construction and prices at which these types of residential units will be offered. Zone rules can shape housing typologies and enable choice to some degree, but cannot determine or control the type of development that actually takes place.
9. The requirement for 'enough' development capacity that is feasible and 'likely to be taken up' to meet the demand for land and dwellings over the short, medium and long term, is appropriate but requires consideration of land banking, relative attractiveness of areas, and other matters in the same way as for previous feasibility assessments. However, Council is particularly concerned about the continued NPS requirement to effectively provide a (surplus) buffer of land or dwellings (20% extra in the short and medium terms and 15% extra in the long term) and to plan for infrastructure to be in place to service that land. This risks unnecessarily increasing Council costs.
10. The Council cannot fund the costs of infrastructure planning for buffers through development contributions, meaning that existing Council funds, borrowing, and ratepayers must cover these costs. Ratepayers and developers will pay a premium for these large buffers, through high holding costs, long cost recovery times and the risk of infrastructure being planned or provided that is underused or not used at all. This would put upward pressure on rates and on housing costs, which is contrary to the Government's objective of making housing more affordable.
11. The Long Term Plan is unlikely to be able to factor in these additional 20/15% buffers appropriately, because they are additional to the amount of growth that Statistics New Zealand is projecting will occur, and thus unlikely to pass an external audit. Any early investment or over-investment by councils close to their debt limits will lead to suboptimal overall capital investment simply to meet the requirements of the NPS. Thus support from central government will be needed in order to fund the additional infrastructure, if this requirement is retained.
12. The further requirement that infrastructure required for long-term capacity is identified in the relevant infrastructure strategy (P4A) is ambitious, given how little certainty there can be regarding eventual development to be serviced. The Council's 30-year Infrastructure Strategy is a high-level document only and cannot be used for detailed planning.
13. Some of the infrastructure required is the responsibility of central government or regional government, such as State Highways and Rapid Public Transport. However, business cases for these cannot include the 20/15% buffers, as that is a hypothetical situation. This means that it

will not be possible to provide sufficient infrastructure to meet the requirements of the proposed NPS-UD. One of the pillars of the Government's Urban Growth Agenda is infrastructure funding and financing, and the Council requests support from central government to fund the requirements of the NPS-UD in line with this.

14. The NPS-UD would also result in unnecessary costs associated with staff responding to ad-hoc requests for rezoning of greenfield land outside of areas identified for urban development (see page 38 of the discussion document). This could divert staff from working on other growth priorities such as growth corridors and Central City regeneration. (For more on the Council's view on this proposed policy, see the section on greenfield development below.)

Community involvement in local decision making

15. The policies contained in the document will have wide-ranging implications for communities. However, the document makes little mention of communities and their needs and aspirations, and how they can be involved in decision making. The Council believes that the Government should consider providing resources that will enable people and community/residents groups to more easily obtain advice and support on planning matters, in order to better participate in district planning and resource consent matters. Community planning centres are just one of many examples of ways in which more government resourcing could enable better community involvement.
16. Engagement with communities should be a greater focus of the development of the NPS-UD. The timing of this consultation is very challenging for councils, in terms of being able to have an in-depth conversation with our communities on the impacts of the proposals. Because the discussion document gives different options for some of the policies within it, the final draft version of the NPS-UD should be put back out for public consultation, once the Government has decided which option they are proposing.

Extent of the Christchurch Urban Area

17. Many of the policies in the NPS-UD will now only apply to Major Urban Centres, including Christchurch. Statistics New Zealand defines the Christchurch Urban Area as wholly contained within Christchurch City Council's boundaries. The application of the term 'Major Urban Centres' as set out on pages 19 and 20 of the discussion document should technically be consistent with the Statistics New Zealand definition of the Christchurch Urban Area, and thus for Christchurch not extend beyond the Christchurch City Council boundary. However, Greater Christchurch operates as a single housing and business market, so it is important that the proposed NPS-UD does apply also to those parts of Waimakariri and Selwyn Districts that form part of Greater Christchurch (as set out in Table 2). There are elements of the NPS that need to be specifically considered by those areas, for example intensification.

Successful cities and quality urban environments

18. As mentioned above, the Council agrees with the Government's focus on successful cities. However, it is the Council's view that the proposed NPS-UD does not clearly convey what constitutes a 'successful city', nor how such a goal can be achieved. There is no overall direction and vision in the proposed NPS for how towns and cities should be growing and developing. While the draft objectives include a focus on long-term strategic planning that provides for 'quality urban environments', the document does not explain this term sufficiently, nor does it provide clear direction as to what constitutes such an environment.

19. There does not need to be uniformity in the features of all quality urban environments, and what is a quality urban environment. There must be room for areas to decide for themselves on the development of their urban environments, in keeping with central government objectives and policies. The NPS-UD should reference design guidelines from local authorities and encourage the use of Urban Design Panels and Design Advisory Committees in heritage areas to assess intensification proposals. Intensification must not be at the cost of existing built and landscape character, including significant areas of open space within urban areas. If intensification occurs in a uniform manner it could strip urban areas of the diversity and character that gives them “soul”. If the definition of a quality environment is to be determined by each local authority in consultation with its communities then the Council requests that this be made clear within the document.
20. The document focuses on the supply of affordable housing. However, indicators in housing and development must be considered alongside other indicators relating to deprivation, unemployment, education, and health issues. These factors are all part of the urban environment and affect many people directly and indirectly. The discussion document does not address these matters despite their importance to the quality of urban living. The Council appreciates that the Government has a number of programmes aimed at promoting the four wellbeings, and would like to see these referred to in the NPS-UD by way of context to provide assurance that the NPS-UD is part of a wider package of measures to achieve quality urban environments.
21. It is not clear that the focus on land supply solutions in the NPS-UD will adequately address the problem of housing affordability. The Greater Christchurch Urban Development Strategy and the Christchurch District Plan provide for sufficient land for housing for at least 30 years at current rates of take up. However, housing is still unaffordable for many people and we are still struggling to encourage Central City living over suburban greenfield locations. The Council does not agree with the apparent underlying assumption in the proposed NPS-UD that housing is unaffordable because the planning system is overly restrictive, preventing the market from supplying affordable land, and considers it simplistic to attribute any lack of development to planning rules alone. These are complex issues and the discussion document’s approach does not paint a full picture of how housing and land markets work in urban areas, nor does it mention funding to local government that might aid development or support public transport and community facilities.
22. The Council submits that the proposed NPS-UD should recognise that land values are primarily a function of the underlying highest use value of the land. The price of residential land is based on its residual value once house values and development costs are taken into account. This in turn means the proposed NPS-UD framework is unlikely to provide adequate prescriptions and tools for local authorities to tackle affordable housing. For example, it will not assist local authorities to justify, and survive challenges to, any requirements in plan changes to provide a proportion of affordable housing when rezoning land to a higher residential use.

Future Development Strategy (FDS)

23. Overall, the Council supports the requirements for a Housing and Business Capacity Assessment (HBA) and FDS to be undertaken to inform Long Term Plans (LTPs), notwithstanding our concerns about funding for the 20/15% buffers. The assessments of

housing and business land development capacity are essential components of growth planning.

24. We consider that better alignment with LTP processes is desirable. However, in terms of timing, the next HBA and FDS will not be able to inform the 2021 LTP as the planning for this LTP has already commenced. It would be more appropriate for the next HBA and FDS to inform the subsequent LTP (2024), rather than be required to inform the 2021 LTP. This would also enable us to use the detailed, area-distributed 2018 census projections (expected late 2020) and would inform a full review of the Canterbury Regional Policy Statement, scheduled for 2022/2023.

Making room for growth – greenfield development

25. The Council considers the policies around out-of-sequence greenfield development to be too directive, and inappropriate for application on a national scale.
26. The proposed NPS-UD would facilitate continued ‘business as usual’ greenfield development rather than demanding integrated subdivision and land use planning. The latter would better ensure quality while achieving higher density urban outcomes. There are broader network/facility planning and community development implications associated with outward growth that the document does not appear to have considered at all. Achieving quality urban environments in lower density greenfield developments can be difficult and expensive. If the NPS-UD aims to achieve higher densities in existing urban areas, it should also set minimum densities in greenfield areas.
27. As mentioned above, the Government has recently announced its intention to sell all 75 Kiwibuild houses in Canterbury due to lack of demand. Most of these unsold houses are in Selwyn and Waimakariri and greenfield areas, whereas the fewer houses in existing urban areas sold much better. Greenfields development as a proportion of the total new housing that the market has been providing in Christchurch City has been declining since 2013. Since 2017, the majority of housing, i.e. more than 50% of net new housing, has been within the existing urban area in the form of infill, rather than in greenfield areas. This indicates that these types and locations of homes are in demand, particularly amongst typical first-home buyers, and is further evidence that we should be focusing on quality intensification and all that this entails.
28. Directing councils to consider unplanned growth in greenfield areas would risk working against the requirements for evidence based plan-led intensification, and would impose time and resource costs on councils. If implemented, this policy would mean councils are required to spend large amounts of time responding to plan change requests, and community reaction and litigation, to the detriment of undertaking ‘responsive planning’. This policy also risks conflicting with the National Policy Statement on Highly Productive Land, and should therefore require consideration of whether or not the land in question is highly productive land.
29. Overall we consider that this proposal pulls in the opposite direction to the rest of the NPS-UD. If councils undertake the NPS requirements to assess plan-enabled capacity and respond to any shortfall through an FDS on a very regular basis, there should be no need to spend additional time and resources assessing the merits of such growth in less than optimum locations. We strongly oppose this aspect of the draft and suggest that the appropriate time to consider such ad-hoc opportunities is through the FDS process, in response to an identified

capacity shortfall, and potentially through a 'call for sites' stage in the FDS process (as is undertaken in the UK).

Making room for growth – intensification development

30. The proposed NPS-UD is likely to require greater intensification than what is enabled in Christchurch's recently-developed District Plan, without considering the local priorities specific to Christchurch. Such blunt measures to impose density could have significant adverse effects, for example on the character of areas or their historic heritage. There is also very little consideration of natural hazards such as flooding and liquefaction potential in the proposed NPS and none in the sections on intensification.
31. P6C Option 2 in the discussion document requires higher density around 'centres' and 'frequent public transport stops', but these terms are not defined. Christchurch has over 130 centres of a wide variety of sizes and functions, with around 100 of these being local centres which are not meant to be accessed by public transport but rather primarily by walking (these centres are not intended nor appropriate as growth modes). If this option were to proceed we request clarity on what these terms mean, and the omission of local centres, due to the risk of inconsistency across the country, and potential legal challenge on local interpretations.
32. In Christchurch, 10% of flat 'urban area'^[1] is already enabled for medium density within 800 metres of our Key Activity Centres, and in the Central City within a number of zones. This policy approach provides more than sufficient development capacity to meet projected long term needs^[2]. If the Council were required to adopt the approach of increasing density around our centres (including local centres), this would increase to 60% coverage i.e. six times the current provision. This does not take into account further increased density around frequent public transport corridors, which is likely to be significant. The wording in P6C Option 2 would also require residential intensification within industrial zones, where they fall within 800 metres of frequent public transport stops. The Council does not support this because this land may be needed for industrial purposes. The potential effect of draft policy P6C Option 2 is illustrated by the maps the Council has provided as appendices to its submission. This degree of intensification is neither necessary nor desirable and such dispersed growth may run counter to our objectives of facilitating recovery of the Central City and Key Activity Centres.
33. Christchurch generally has a zoning pattern similar to the philosophy behind the P6C options. The higher density zones in the Christchurch District Plan surround the Central City and some of the largest centres. These centres are also served by frequent public transport. Christchurch is also considering options for higher density further along public transport corridors, as part of the Christchurch Spatial Plan work associated with the Greater Christchurch Future Public Transport Business Case. We would welcome further support from the Government for this work.
34. Overall, the Council's preferred option is a revised Option 1 that enables councils to provide for higher densities in appropriate locations in response to their housing and business land capacity assessments.

^[1] Described as all industrial, commercial and residential zones (except residential hills)

^[2] <http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Our-Space-final/Our-Space-2018-2048-WEB.pdf> - see page 15.

Prescriptive vs flexible requirements

35. The NPS-UD combines prescriptive options, such as requiring higher densities in particular areas, with flexibility in wording, such as ‘except where evidence demonstrates that intensification should not be enabled’ (P6C). Providing a prescriptive direction with some flexibility is a valid approach but could create some difficulty, because the Council is required to give effect to the prescriptive part of the policy, with the application of the flexible policy open to debate and legal challenge. It would be costly and time consuming to test where there is sufficient evidence demonstrating that intensification should not be enabled. This could hold up the implementation of the NPS-UD. In some situations there would be no ability for local communities to have input into whether or not intensification should be enabled.

Car parking

36. The removal of regulation around car parking (P7A Options 1-3) will support the rebuild of some centres such as the Central City (which already has parking minimums removed) and Lyttelton (for which the Council is proposing to use section 71 of the Greater Christchurch Regeneration Act to remove parking minimums), and may help to support a mode shift. However, to ensure the removal of rules is workable, on-street parking will need to be managed efficiently for businesses and residents, given that the city is still rebuilding. The Council will need central government to provide funding support for improved public and active transport options. This would mitigate the risk that the removal of parking rules will not provide a sufficient mode shift and result in negative consequences, particularly in terms of increased spillover parking in any local residential receiving environments that, under these proposals, will have no input in the decision to remove car parking rules.
37. While the Council supports the overall intent of the policy and would prefer to see Option 3 adopted, it considers that this is a level of detail that is possibly too low a level for a national policy direction. It is one of many factors that may decrease the quality of urban environments and the efficiency of land use, and it seems out of place therefore to isolate this at a national level.

Evidence for good decision making

38. The test of ‘best available evidence’ should also be applied to the drafting of national policy statements. The discussion document does not appear to have been fully informed by current local government practice.
39. Current Resource Management Act processes such as plan changes for rezoning already require section 32 evaluation reports. The recent Christchurch District Plan review carefully considered intensification and greenfield development and ensured that the supply of residential land was adequate for all time periods - short, medium, and long term.

Climate change

40. The Council considers that there is insufficient linkage between this NPS-UD and the government’s carbon zero initiatives, and that the NPS-UD could be strengthened in that regard. The proposed NPS-UD would benefit from a more robust consideration of the impacts of climate change on the urban environment. The focus of this NPS-UD on delivering more affordable and quality housing should also incorporate climate change mitigation and

response objectives such as making efficient use of land and infrastructure (which is important to local government planning and financing, and supports intensification), and facilitating the move to urban environments that support a low-carbon economy.

Working together

41. The Council would like to build stronger relations with central government as part of a 'whole of government approach' to dealing with urban problems, particularly at a community level. The Council considers that central government could better work with local authorities on a collaborative basis, to provide a comprehensive and integrated approach to urban policy development and implementation. Although this proposed NPS is intended as a means of promoting the Urban Growth Agenda, it will need to be revised and to work alongside other initiatives to achieve this goal more effectively. For example, the Government could engage more directly with the Council to work particularly on growth corridor priorities, affordable housing projects, and Central City regeneration, and better integrate decision making through initiatives such as spatial planning.

Comments on the proposed National Policy Statement on Urban Development- Responses on Consultation questions

Overview - Why a NPS is appropriate (pp.16-18)

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?

- 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?

Comments:

- The intent is good, although we have some significant concerns about the objectives and policies in the NPS.
- Other possible tools that could supplement this include:
 - The Urban Design Protocol - the government could consider how its application could be strengthened through this NPS or in District Plans. The “principles of place-making” are a good tool for achieving quality urban environments.
 - The Government should consider economic instruments such as betterment levies and similar forms of value capture in relation to “windfall gains” from up-zonings, as additional tools to guide and lead the market place. It is acknowledged that there can be administrative issues, e.g. in calculating the land value increment and resulting charges; however they would help to encourage higher value land uses, rather than giving away gains from increased development opportunities as a right.

Replacing the NPS on UDC 2016 - Targeting cities that would benefit most (pp.18-20)

2. 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?

Comments:

- We accept that Christchurch and other major urban centres should be subject to the NPS objectives and policies on residential and business capacity and planning for intensification. However, a one-size-fits-all approach does not work, and we are not supportive of the most directive policy options indicated. See comments in table of comments on objectives and policies for more on this.

FDS (O1, P1A-P1I) (pp.21-25)

3. 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?

Comments:

- Overall, the Council supports the requirements for a Housing and Business Capacity Assessment (HBA) and FDS to be undertaken to inform Long Term Plans (LTPs), notwithstanding our concerns about funding for the 20%/15% buffers. Assessment of housing and business land development capacities is an essential component of growth planning. We consider that better alignment with LTP processes is desirable. However, in terms of timing the next HBA and FDS will not be able to inform the 2021 LTP, as the planning for this LTP is already well advanced and the recently completed FDS and HBA under the NPS-UDC is already informing it.
- It would be more appropriate for the next HBA and FDS to inform the subsequent (2024) LTP. This would also enable Council to use the complete 2018 census projections for subparts of the Christchurch Urban Area (not expected till late 2020) and would inform a full review of the Canterbury Regional Policy Statement (RPS), scheduled for 2022/2023 (see the attached diagram).

Making room for growth - Describing quality urban environments (O2, P2A-P2B) (pp.26-28)

4. 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?

Comments:

- The document does not sufficiently explain the term ‘quality urban environment’, nor does it provide clear direction as to what constitutes such an environment. The proposed description of contributors to quality environments is restricted in the range of matters covered, and also vague in the way it is expressed, e.g. what does “changing needs and conditions” include? It also seems to assume that if efficiency is achieved, this equates to quality, which is not always the case. The features described in the draft objective O2 are not features of a quality environment, but ways of enabling one.
- It may be unhelpful to define ‘quality’ so widely. If the definition of a quality environment is to be determined by each local authority in consultation with its communities, then the Council requests that this be made clear within the document.
- The first paragraph on page 27 lists elements that contribute to quality environments. However, there could be another list of elements that can detract from the quality of an environment, such as poor building design (size, appearance, configuration), lack of outdoor living space and poor design of what there is, lack of storage/waste management space, lack of neighbourhood cohesion and residential displacement (by short term accommodation providers in particular). It omits the fact that the quality of the environment can be adversely affected by district plan rules that are too permissive.
- The second paragraph on page 26 of the discussion document states, “The NPS-UD would give direction on what is meant by quality urban environments, both in existing and future urban environments”. This will need to reflect the potentially different nature of these two environments and the difficulty and costs of retrofitting an existing urban environment to meet a higher standard than currently exists, as well as urban environments of different scale, and the subjectivity involved.
- The focus should be on the need for close alignment between the NPS-UD, LTPs and infrastructure strategies, without duplicating effort.

- There is a missed opportunity to discuss the impacts of climate change on the urban environment. The proposed NPS should consider how to make efficient use of land and infrastructure and move to urban environments that support a low-carbon economy, alongside the delivery of affordable and quality housing.

Making room for growth - Amenity values in urban environment (O4, P3A) (pp.28-30)

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?

Comments:

- What, if any, additional guidance to that in the RMA e.g. in Part 2, will be given regarding how to make the necessary trade-offs?
- We need urban environments that reflect the identity of the place they are in, including a greater recognition of place making.
- The document lacks promotion of positive change to amenity values over time and recognition of the contribution of amenity values towards increasing a sense of well-being and identity. Therefore, we suggest the following text addition to P3A: “In making planning and consent decisions, decision-makers must recognise that amenity values a) increase a sense of identity and well-being; b) vary among individuals and communities; and c) change over time.”
- The proposed objective and policies could undermine existing heritage and urban design rules, given the apparent promotion of development rather than quality development. As currently drafted, they lack a forward looking and aspirational focus.
- The Council would like to understand whether the Government intends to consult in a meaningful way with potentially affected communities, as well as directly with councils.

Making room for growth - Enabling opportunities for development (O5, P4A-P4G) (pp.30-33)

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?

Comments:

- There is a need to distinguish between development capacity and take-up of development capacity, as there are a number of influences outside of councils’ control (including global economics, market forces, and land banking) that affect take-up. It is difficult to predict development take-up, as this fluctuates over time, or to link this to affordability.
- Assessing the amount of development that is likely be taken up in particular locations will be difficult. It is impossible for councils to have certainty regarding the eventual housing typology and price points at which dwellings are constructed.
- This appears to be double accounting for take up. Both the original and this new NPS include an additional margin of 20%/15% to account for development opportunities that are not taken up by the market. It is therefore unclear why it is necessary to also consider the likelihood of opportunities being taken up, when there is already additional land providing a

margin. In the context of reviewing the evidence base every three years and providing or identifying a 30-year supply of land, this is certainly not necessary.

Making room for growth - Ensuring plan content provides for expected levels of development (O6, P5A-P5D) (pp. 33-35)

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?

Comments:

- It's not clear in the policy itself whether the intention is that the existing zone descriptions must be amended to be the same as the ones in the National Planning Standards or not, but from the description preceding this policy, this seems to be the intention. The National Planning Standards limit the number of zones, will be generic in their description of them, and will not be sufficiently prescriptive to provide the guidance anticipated. Nor will the provision of a zone description encourage or ensure that the type of development desired is actually built.
- All six major urban centres already include zone descriptions in their plans. What the NPS-UD is seeking to achieve with this policy is already accomplished by zone objectives and policies in those same plans. Christchurch City Council submitted in opposition to the zone descriptions in the National Planning Standards being given statutory weight during consultation on the Standards, as many of the zone descriptions are vague, not fit for purpose, and contrary to local strategic objectives. In some cases, giving statutory weight to the descriptions will work against the stated purpose of the NPS-UD itself by, for example, making it easier to use residential-zoned land for non-residential activities. For further comment on these proposed policies, please refer to the table of comments on the draft objectives and policies.

Making room for growth - Providing for intensification (O7, P6A-P6D) (pp.35-38)

8. 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?

Comments:

- Locating higher-density development in and around centres, to support closer matching of housing and jobs, is already enabled to a large extent in Christchurch. The zoning has been achieved through the identification of Key Activity Centres in the Canterbury Regional Policy Statement, and is simply good planning practice. The higher-density zones in the

Christchurch District Plan surround the Central City and some of the largest centres. These centres are also served by frequent public transport. Christchurch is also considering options for higher density further along public transport corridors, as part of the Christchurch Spatial Plan work associated with the Greater Christchurch Future Public Transport Business Case.

- 10% of Christchurch's 'urban area' is already enabled for medium density within a walkable catchment of the Central City and Key Activity Centres, within our Residential Medium Density, Residential Central City and some commercial and Residential New Neighbourhood Zones. **Together this policy approach provides more than sufficient development capacity to meet projected long term needs.** Current zonings and their extents are already adequate to provide for short, medium and long term needs.
- If the approach of increasing density around all centres (including local centres) was adopted, this would increase to 60% coverage, i.e. six times the current provision enabled in Christchurch. If densities were also increased around the higher frequency bus routes, this would increase to 70%. The Council has provided maps as part of its submission, to illustrate these effects.
- Over provision of medium density opportunities is likely to lead to its provision in less than optimal suburban locations, with adverse implications for efficient infrastructure planning and for Central City recovery.
- The focus of the document should be on comprehensively planned, quality and place-appropriate development (outcomes) as opposed to prescriptiveness or not (methods).
- Mandating minimum densities so much higher than current densities is a concern as this could well increase vehicle use, unless there is Government funding to support improvements to the public transport system.
- Note that in many cases, the densities achieved at the moment are in fact higher than the minimum set in the Canterbury Regional Policy Statement, which requires 30hh/ha for new development in existing built up areas outside the Central City (i.e. excluding greenfields areas). In Christchurch's Residential Medium Density zone, new development is on average achieving over 40hh/ha, with larger sites generally being higher than this. However, the density minimum of 30 hh/ha works well for smaller or awkwardly-shaped sites where site amalgamation cannot occur. If the HBA and FDS process works as intended, to enable sufficient development capacity, there is no need to go further.
- A prescriptive requirement will be more likely to enable intensification, but it needs to be clear (i.e. terms like centres, frequent bus routes, central city etc defined, to avoid costly delays through legal challenges when Councils tried to implement it), and appropriate to the circumstances of the 6 major urban centres. Suggested wording is provided in the table.
- Density requirements should be stated as dwellings per hectare. We note the question mentions 80 dwellings per hectare, but the policy mentions 60.

Making room for growth - Providing for further greenfield development (pp.38-40)

9. 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 to 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?

Comments:

- The Council strongly opposes the inclusion of this policy, which would be contrary to the otherwise good intent of the NPS to deliver well-considered, integrated subdivision, land use and infrastructure planning. The latter can better ensure quality urban environments while achieving higher density.
- There are broader network/facility planning and community development implications associated with outward growth that the document does not appear to have considered. Achieving quality urban environments in lower density greenfield developments can be difficult and expensive. If the NPS-UD is to require higher densities in existing urban areas, it should also consider setting minimum densities in greenfield areas.
- Because the FDS is reviewed so frequently, new greenfield opportunities can be considered on a regular basis anyway. Private plan changes for rezoning can be proposed at any time and must be processed (this applies to the Christchurch District Plan, where nearly all the provisions have been operative for more than two years). Promoting proposals for greenfield development beyond the existing planning framework is providing a solution to a problem that does not exist.
- The text for the example policy states that “existing urban boundaries or planned land release sequences are sometimes defended to encourage a particular urban settlement pattern, or to manage infrastructure costs.” This implies that a consolidated pattern of development might not be a good thing, and/or that managing infrastructure costs is not a legitimate aim for local government.
- The policy is inconsistent with the NPS-HPL, because the many of the major urban centres, like Christchurch are surrounded by Highly Productive Land (HPL), and the NPS is seeking to avoid urban development on HPL. Under the proposed policy in the NPS-UD there is no reference to HPL being a consideration, so the policy could end up requiring Councils to provide for urban development on HPL, when the NPS-HPL seeks to prevent that. This policy means that Councils will have to try and implement two conflicting National Policy Statements, which will lead to costly legal challenges as to which NPS takes precedence.

Making room for growth - Removing minimum car parking requirements (P7A - 3 Options) (pp.40-42)

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?

- 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 mixed use 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?

Comments:

- For further comment on each of the options, see the table of comments on the draft objectives and policies.
- Removing minimums in just high and medium-density areas would lead to economic gain for developers, and an increased need to manage on-street parking, in the short and medium term. Buildings for commercial use are likely to still include internal car parking to attract tenants but residential buildings may not.
- In the long term removing minimums would allow cities to be shaped more sustainably as areas become denser and the use of space is used more efficiently.
- An 18-month implementation timeframe may be able to be achieved, but is not desirable as it is clear that many communities oppose a lack of car parking in their commercial centres. Alternatives such as communal off-site parking take time to implement. As noted in the table of comments on the draft objectives and policies, removal of parking requirements needs to be phased in as public transport is improved, and should not include the removal of mobility parking standards.
- A parking strategy should be considered and implemented for best management, to provide guidance to local authorities on how to best manage development and parking. A good parking strategy will include all or some of the following: mode choice, pricing, prioritisation, sharing, effective utilisation, user information, adaptability, peak management, and quality and cost-benefit analysis.
- We would not support the option of removing maximums, as it would not enable Councils to control car parking, which removes one of the levers to promoting mode shift.
- Out of the options, Option 3 would be the option that is less risky.

Making room for growth - More directive intervention to enable quality urban development (pp.42-45)

11. 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?

Comments:

- The Council does not consider this to be necessary. If councils carry out their NPS-UD requirements to complete a HBA and FDS, there is no capacity issue left to resolve. If there is a capacity issue to resolve, that is the appropriate time to consider the full range of tools, including district plan rules. The current NPS already includes a direction to consider “all practicable options” when considering a planning response. In Christchurch, we have abundant capacity in existing urban areas without the need to resort to requiring a minimum level of development across urban areas. To do so may be contrary to other objectives for our

city including promoting an urban form that makes efficient use of land, is attractive and inclusive, and responds to climate change imperatives.

- Comprehensive redevelopment could provide more housing of higher quality. This would be easier to achieve if the current model of subdivision and land use planning was overhauled to fully integrate the two processes.
- District plan rules work together as packages to determine, and cumulatively contribute to, the quality of the urban environment and the identity of places and neighbourhoods. For example, there are special, earthquake-related reasons for height restrictions within Christchurch that would not be appropriately included in a one-size-fits-all removal of district plan rules. Precluding or replacing any of them, including via a generally applicable National Planning Standard as suggested on page 44 of the discussion document, requires very careful consideration, including of the potential perverse outcomes from doing so.
- There are further comments on this issue in Councils table of detailed comments under the section “More directive intervention to enable quality urban development.”

Evidence for good decision-making - Using market information to make decisions (O9, P8A-P8D) (pp.46-48)

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/why not?

Comments:

- Agree that it is appropriate to monitor key indicators, although not on a quarterly basis. Half-yearly monitoring would be sufficient to indicate trends.

Engagement on urban planning - Taking into account issues of concern to iwi and hapū (O9, P9A-(B) (pp.49-51)

13. 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?

Comments:

- Councils already consult with iwi during and after the preparation of draft plan changes and plan reviews, and must take Iwi Management Plans into account when preparing or changing their district plans. This includes consultation in regard to plan changes for rezonings and plan changes providing for more intensification. Therefore the policies included in this proposed NPS add little to this.
- As well as urban environments, Iwi are concerned about resource management provisions for rural environments and for kainga nohoanga (papakainga) zones, which in the case of Christchurch are predominantly located on Banks Peninsula, and except for Rapaki, outside of the Greater Christchurch area.
- It should be noted that Christchurch has a Te Hononga Council - Papatipu Runanga Committee, which is a standing committee of Council directly managing Council's relationship with runanga in its rohe, and serviced by two permanent staff dedicated to the Council- Ngāi Tahu relationship.

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/hapū? Why/why not?

Comments:

- These comments are relevant to providers of ‘other infrastructure’ only. It is unclear how this is intended to work in practice, particularly P10B. Our experience engaging with providers of ‘other infrastructure’ in preparing the first capacity assessment was underwhelming in terms of interest and contributions to inform any useful outcome. Many such providers chose not to engage at all, some are typically ‘late reactors’ to land use change and many plan their infrastructure to respond to, rather than inform growth plans and/or have shorter planning horizons (e.g. electricity infrastructure providers typically plan for 10- 15 year timeframes).
- Every additional requirement in national direction requires time and resources and if it doesn’t add value at the planning stage, it should be removed.
- For such engagement to be meaningful, there needs to be a mandate for all parties to participate, not just councils. We would be interested in whether the Government has asked these providers what involvement (if any) would add value or whether it is only the outcome of the NPS (a clear idea of where growth is anticipated) that is most useful to them.

Timing (pp.54-55)

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

Comments:

- Better alignment with LTP processes is a desirable outcome. However, as stated above, there is no ability for the next HBA and FDS to inform the 2021 LTP as the planning for this has already commenced.
- The next HBA and FDS will inform the subsequent LTP (2024) and this would also enable Christchurch City Council to use the 2018 detailed census projections (expected late 2020). All of this will inform the full review of the Canterbury Regional Policy Statement, scheduled for 2022/2023.

Guidance and implementation support (p56)

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

Comments:

- Very clear guidance and clear definitions in the NPS itself.
- The guidance provided with the 2016 NPS proved somewhat inadequate, pointing to information sources that were not always fit for purpose, and including some statements that were not fit for purpose. For example, the guidance states (page 67) that, “It is possible to visually inspect and record activity in a relatively short space of time, for example, to drive around all the industrial areas in most large or high growth urban areas would generally take less than two weeks.” The footnote indicates that this level of surveying was undertaken for the Auckland Proposed Unitary Plan hearings. While this generalised level of information might have sufficed in that context, it would certainly not meet the requirements of the NPS.
- Most local authorities do not have the staffing resources that Auckland Council has. In reality, meeting the requirements of the last NPS proved expensive and time consuming for Christchurch City Council.

Alignment with other national direction under the RMA (pp57-61)

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 and include any suggestions you have for addressing these issues.

Comments:

- Yes, there is a clear area of inconsistency between the proposed policies in the NPS on greenfield development and the draft NPS on Highly Productive Land.
- Even without this inconsistency, the proposed directives to more seriously consider approving plan changes to rezone land in locations that are “out of sequence” has the potential to undermine growth strategies and the efficiencies of consolidated patterns of urban development.

18. 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.

Comments:

- No. A one-size fits-all standard for how urban development should be managed would be completely inappropriate.

Questions from Appendix 3 - Policies on Housing and Business Development Capacity Assessments (AP1-AP16) (pp.71-78)

A1. Do you support the changes to the HBA policies overall? Are there specific proposals you do or do not support? What changes would you suggest?

Comments:

- The Council welcomes the greater flexibility proposed for the preparation of an HBA, particularly around timing and the ability to update rather than conduct a wholesale review of the assessments to reduce compliance costs. It remains to be seen whether this actually translates into lower costs given that the whole process needs to be undertaken in any event to yield updated results.
- We support the need for a strong evidence base. Assessment of housing and business land development capacity are an essential component of growth planning.
- We do not support the existing and ongoing requirement to assess the commercial feasibility of business land. This is too complex to model at a strategic level in a similar way to the housing feasibility assessment and the proposed approach outlined in the guidance (multi-criteria assessment) is too resource intensive and does not actually test commercial feasibility. Rather, it assesses key characteristics that may have some influence on feasibility and take-up in a general way; these are factors that we are well aware of for our constituent areas/locations, without needing to undertake complex assessments of “commercial feasibility”.
- The Council supports the HBAs being updated in time to inform the next FDS and LTPs. However we note that to best align with these processes and utilise the 2018 census projections and inform our CRPS review, it is highly desirable for work on the HBA to commence after the release of the detailed census projections, and be completed by December 2021. This will inform the 2024 LTP.
- We support the requirement to test different scenarios. However, one scenario has to be landed to inform subsequent planning and infrastructure decisions, so more guidance on this would be useful.

- See comments above regarding the double accounting for take up and the 15%/20% margins.
- We share the concerns expressed by Market Economics about the appropriateness of using price efficiency indicators, as these perpetuate a misunderstanding that higher urban land values indicate that the land market is operating inefficiently, when instead those large differences in value reflect efficient urban growth patterns¹.
<http://www.marketconomics.co.nz/LiteratureRetrieve.aspx?ID=215762>
- The draft policy AP13's reference to different zones is too specific and should only relate to commercial and industrial. Otherwise, for Christchurch City this would require an assessment of capacity for a range of zones including three different industrial zones, seven different commercial zones, and special zones such as the airport and Lyttelton Port.
- AP15 - the reference to tenure would be too onerous for both business and housing. Tenure information is not readily available, and houses and businesses transition between tenure types over time without notification to Council.
- AP17 – guidance on what constitutes ‘major’ (land owners) would be welcomed. It would also be helpful to clarify that there should be input from requiring authorities that have the benefit of designations in that major urban centre. This will avoid councils contacting requiring authorities who only have an interest in other centres (as the Council did last time).

A2. What do you anticipate the impact of the proposed policies (and any related changes) would be on planning and urban outcomes?

Comments:

- We do not expect that the changes in the proposed NPS will have much effect on planning and urban outcomes, and they will certainly not deliver the benefits set out in the Regulatory Impact Statement e.g. on pages 3-4 of that document. Any real change would come about as a result of the more draconian and directive policies proposed (e.g. requiring intensification at levels far beyond demonstrable need, and the promotion of dispersed greenfield development), if these are carried through into the final NPS. Outcomes under these policies would be detrimental to urban amenity in Christchurch and to existing (largely efficient) growth management strategies.

A3. Are the margins proposed in policies AP3 and AP12 appropriate? If not, what should you base alternative margins on? (e.g. using different margins based on higher or lower rural-urban price differentials).

Comments:

- It does not really matter what the margins are. The more relevant considerations are:
 - whether the margins represent double counting in view of the feasible and likely requirements (AP9); and
 - whether the margins are appropriate in view of the Audit office reviews of council Long Term Plans, when LTPs cannot realistically be based on anticipated growth **plus** margins.

A4. How could these policies place a greater emphasis on ensuring enough development capacity at affordable prices?

Comments:

¹ Fairgray (June 2019) Making Room from Growth – S strategy founded on poor economics

- Housing affordability is a much wider question than urban planning strategies. Increasing the supply of land and providing for intensification to occur are policies that will not, in themselves, ensure affordable prices. Any assumption that they will is based on an overly simplistic analysis of land, development, and construction markets.

A5. Do you support the approach of targeting the HBA requirements only to major urban centres? Why/why not?

Comments:

- This may be advantageous for smaller councils, in that it reduces administrative reporting. However, it may increase the risk of creating an NPS approach that does not provide a comprehensive vision for New Zealand's cities and towns.

Comments on the proposed National Policy Statement on Urban Development

Future Development Strategy (pp 23-24)

Proposed objective/policy	Notes	Comments
<p>General comments about the document</p>		<ul style="list-style-type: none"> • The document could do more to support long-term strategic planning, or quality outcomes. It lacks direction and vision for the growth and development of NZ towns and cities. This should be the focus of the document, rather than matters such as reducing regulation. • It would be more useful for government to develop a national integrated growth and infrastructure strategy that identifies key locations for growth and infrastructure investment (eg transport corridors in the bigger cities), promotes the integration of land use and infrastructure, and considers the country as a whole, not just the highest growth or largest cities in isolation. • A Future Direction Strategy is also referred to in the discussion document, so it needs to be clear what terminology is proposed.
<p>O1: To ensure long-term strategic planning, reflected in planning documents, provides for: a) integrated land use and infrastructure b) quality urban environments.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 objective OD1 	<ul style="list-style-type: none"> • The definition of quality in terms of urban environments is very weak eg there is no discussion of liveability/good design etc. The discourse on amenity should be around providing vision on the anticipated outcomes for a place or type of place, not a zone. • The proposed NPS-UD will not in itself ensure more vibrant and liveable cities, as it does not focus on improved environmental quality in our cities. Its focus appears to be almost solely on the supply of housing, and in that regard it is little different to the previous NPS. • The proposed NPS continues “business as usual” greenfield development rather than requiring integrated subdivision and land use planning, which could better ensure quality but yet higher density urban outcomes. • The document appears to provide equal support for greenfields development and for intensification. While all types of growth have infrastructure implications, there are also broader network/facility planning and community development implications associated with outward growth that do not appear to have been considered. Achieving quality urban environments in lower density greenfields developments can be difficult and expensive.

		<ul style="list-style-type: none"> • Removing rules and requirements for development may be laudable but this is not likely to result in higher quality outcomes. If intensification is achieved via District Plan changes involving directive policies, or simplistic rules, higher quality outcomes may be lost. • Community, community aspirations and community engagement in place-based decision making are barely mentioned in the document. • As a result of the recent fast track District Plan Review in Christchurch, and central government's Statement of Expectations in the Order in Council controlling the District Plan, the City already has a very permissive District Plan. There is a widespread perception that the community was largely left out of the process of developing that Plan. Further direction by the NPS as to how the City should develop will be unpopular with the public in light of the City only now transitioning to a greater degree of local decision-making.
<p>P1A: Local authorities must, every three years, prepare or update a Future Development Strategy (FDS). An FDS is to demonstrate, for the medium and long term, how the local authority will:</p> <p>a) achieve quality urban environments in its existing and future urban areas and</p> <p>b) meet residential development capacity bottom lines</p> <p>c) allocate development capacity across existing and future urban areas.</p>	<ul style="list-style-type: none"> • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • Amended NPS-UDC 2016 policies PC12, PC14c 	<ul style="list-style-type: none"> • The Council supports the approach of not specifying an exact date for publishing an FDS, due to lack of previous alignment between FDS and LTP timetables for infrastructure planning. • This will mean that the next HBA will need to be completed by December 2021 in order for it to inform Council's 2024 Long Term Plan. Planning for the 2021 LTP is currently underway in Council, based on information available now, e.g. the 2017 HBA. We require a substantial lead-in time for LTP planning across the various units and functions of Council and to allow for community, Councillor and Community Board input. It will not be possible for the NPS-UD to inform the 2021 LTP, as it is too late. • This policy is not consistent with P1D, which also refers to business capacity. The requirements for business land should be more clearly stated in P1A.
<p>P1B: An FDS need not be published as a separate document, but can be part of any other suitable document, for example a spatial plan.</p>	<ul style="list-style-type: none"> • Applies to major urban centres (all others encouraged to give effect to these policies) 	<ul style="list-style-type: none"> • We question whether this is a critical enough matter to be included as a policy. It is more important for major urban centres to demonstrate that they have met the policy requirements. A guidance note would be sufficient to cover this flexibility.

	<ul style="list-style-type: none"> • Drafted in time to inform relevant LTPs • Amended NPS-UDC 2016 policies PC14 	
<p>P1C: Every FDS must be informed by:</p> <p>a) the most recent HBA for the major urban centre</p> <p>b) analysis of costs and benefits of different spatial scenarios for accommodating growth</p> <p>c) scenario testing of different growth rates to ensure strategy is robust</p> <p>d) the long-term plans and infrastructure strategies required under the Local Government Act 2002, and any other relevant strategies, plans and documents</p> <p>e) iwi and hapū resource management issues of concern/significance for the urban environment, including those expressed in any relevant planning document recognised by an iwi authority.</p> <p>Every FDS must consider other national direction.</p>	<ul style="list-style-type: none"> • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • Amended NPS-UDC 2016 policies PC12, PC13c, PC14b 	<ul style="list-style-type: none"> • This policy is merely listing matters which should be considered in developing a growth strategy. What should be done after scenario testing? Set out options for planning and policy responses? What if growth rates turn out to be less than predicted (meaning councils are not able to repay debt incurred in providing new infrastructure and services)? Is the NPS only concerned with requiring a policy response if growth rates are higher than anticipated? • Further, the direction that “long term plans and infrastructure strategies, and other relevant plans and documents” must be considered, is equally vague. Council could merely acknowledge other directions but choose not to weight them highly. This is an issue with the debate on protecting versatile soils versus providing for more housing opportunities. Greater national direction as to the circumstances in which one or the other should be weighted more highly would be valuable. • See comment above about requirement to be drafted in time to inform relevant LTPs. This will need to be the 2024 LTP as there is insufficient time to prepare a HBA, let alone an FDS update to meet the 2021 LTP.
<p>P1D: Every FDS must identify:</p> <p>a) areas where evidence shows urban development must be avoided</p> <p>b) future infrastructure corridors/locations</p>	<ul style="list-style-type: none"> • Applies to major urban centres (all others encouraged to give effect to these policies) 	<ul style="list-style-type: none"> • The amended definition of ‘other infrastructure’ to include ‘<i>public</i> open space’ in Appendix 2 (relevant to this Policy) is confusing and conflicting. ‘Other infrastructure’ is meant to be distinguished from ‘development infrastructure’, which is council controlled. The addition of the word ‘public’ implies that ‘public open space’ is not controlled by Council, which is usually not true.

<p>c) broad locations for long-term feasible residential and business development capacity</p> <p>d) broad locations for residential intensification that contributes to quality urban environments</p> <p>e) the development infrastructure and other infrastructure needed to support growth</p> <p>f) how to provide for business land</p> <p>g) how hapū and whānau aspirations for urban development on whenua Māori within their rohe will be taken into account</p> <p>h) how the strategy will be implemented. This must include:</p> <p>i. estimates of local authority contributions to development infrastructure funding, and the indicative timing and sequencing</p> <p>ii. financing gaps or other risks to the delivery of development infrastructure needs for the medium and long-term, and options for resolving this</p> <p>iii. processes for working with land owners, developers and infrastructure providers to implement the FDS.</p>	<ul style="list-style-type: none"> • Drafted in time to inform relevant LTPs • New policy 	<ul style="list-style-type: none"> • The policy requirement to identify “development infrastructure and other infrastructure needed to support growth” could be strengthened to require consideration of the most appropriate (effective and efficient) infrastructure that will contribute to achieving a “quality urban environment”. For example, previous responses under growth strategies have primarily looked to motorways to support growth, and there is now greater recognition of the need for changed approaches to investment. • The Council supports the direction for an implementation plan (or like document), but suggests that these policy requirements in themselves do not achieve implementation. Rather they are some of the steps required to understand the risks and uncertainties with implementation. How this policy will be deemed to be met requires further consideration. P1D could be rewritten to be integrated with P1H as one policy not two. • Clause (h)(i) requires discussion because even providing indicative costings and timings for long term infrastructure (that beyond the ten year LTP) is not straightforward and there will be significant resource implications. This implies that Council’s Infrastructure Strategy for the 30 year period will need to be developed to nearly the same level of robustness as the ten year LTP, which is unrealistic in itself because circumstances always change over time. There is also no guarantee that the estimated funding identified survives the LTP process each cycle. Perhaps the requirement could be that a draft FDS or implementation plan, including estimates, is prepared prior to the LTP but that the FDS is finalised upon adoption of the LTP. • For bulk infrastructure funded publicly, the planning cycle is at least 30 years, and investment decisions are not reversible. It is best practice to integrate infrastructure and urban development planning. However the policy should recognize that integrated planning is an iterative process, where the future development strategy will not only inform infrastructure strategies but will also itself need to be responsive to network utility infrastructure plans, which direct long-term funding for network utility capacity. • Policy (h)(iii) is a vague requirement. It would be helpful to set out any minimum expectations for how this occurs.
<p>P1E: In addition to the policies P10A–P10C, when local authorities</p>	<ul style="list-style-type: none"> • Applies to major urban centres (all others 	<ul style="list-style-type: none"> • See above comments about timing and alignment with LTPs. • Collaboration with our partners and other agencies is supported and is best practice.

<p>are developing or updating FDSs for a major urban centre they must:</p> <p>a) engage on their FDS with neighbouring local authorities where there are significant connections between infrastructure or communities</p> <p>b) work with relevant central government agencies</p> <p>c) give local iwi and hapū opportunities to identify the resource management issues of concern/significance to them relating to urban environments.</p>	<p>encouraged to give effect to these policies)</p> <ul style="list-style-type: none"> • Drafted in time to inform relevant LTPs • New policy 	
<p>P1F: When developing or updating an FDS, local authorities:</p> <p>a) must undertake a consultation process that complies with either Part 6 of the Local Government Act 2002 or Schedule 1 of the Act</p> <p>b) may combine that process with any other consultation process occurring on another related matter, such as the documents referred to in [P2H].</p>	<ul style="list-style-type: none"> • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • Amended NPS-UDC 2016 policy PC14a 	<ul style="list-style-type: none"> • There is a typo in the reference to P2H (which does not exist), so this policy is unclear. It also does not cover the possibility of using consultation processes that are shortened by the streamlined planning process in Section 80B and 80C of the Act.
<p>P1G: Local authorities must have particular regard for their medium to long-term development capacity allocation as set out in the FDS, when preparing changes to regional policy statements, regional plans and district plans.</p>	<ul style="list-style-type: none"> • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • New policy 	<ul style="list-style-type: none"> • What is meant by particular regard in this context? Is it expected that RPSs or regional plans set out how the development capacity allocation is to be achieved? If so the more appropriate wording would be “give effect to”. The risk is that the statutory responses could be changed by the submission process (potentially weakened), particularly if development capacity allocation is weighted towards achieving a desired rate of intensification.

<p>P1H: Local authorities are strongly encouraged to use their FDS to inform the relevant long-term plans and infrastructure strategies required under the Local Government Act 2002, the Regional Land Transport Plans under the Land Transport Management Act 2003, and any other relevant strategies, plans and documents. [See P2F]</p>	<ul style="list-style-type: none"> • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • New policy 	<ul style="list-style-type: none"> • This policy is not required at all, as an FDS and the evidence base that it was founded on would always be used to inform these other key implementation documents. • It would be more appropriate to delete this policy and rely on a stronger policy on “implementation” (see comments on Policy P1D above).
<p>P1I: Local authorities shall update their FDS every three years, in time to inform relevant long-term plans and infrastructure strategies required under the Local Government Act 2002, and Regional Land Transport Plans required under the Land Transport Management Act 2003.</p>	<ul style="list-style-type: none"> • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • New policy 	<ul style="list-style-type: none"> • See comment above about the issues for timing and alignment with LTP process. • The NPS requirement to provide for buffers over and above projected growth could have an adverse effect on the audit of LTPs by Audit NZ, if the figures for the two different processes were used. These audits are required before LTPs are signed off.

Making room for growth (pp 27-28)

<p>O2: To enable quality urban environments that make it possible for all people, whānau, communities and future generations to provide for their well-being, including by:</p> <p>a) offering people access to a choice of homes that meet their demands, jobs, opportunities for social interaction, high-quality diverse services and open space</p> <p>b) providing businesses with economies of scale, with access to many consumers, suppliers, skilled people and sources of innovation</p> <p>c) using land, energy and infrastructure efficiently</p> <p>d) responding to changing needs and conditions.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • New objective 	<ul style="list-style-type: none"> • A fundamental problem with this policy is that it is not clear or directive on what constitutes a “quality urban environment”. There is no supporting definition of “quality urban environment”, which could promote recognition of the many elements that are internationally recognised as contributing to quality urban environments, e.g. as reflected in the NZ Urban Design Protocol, or Statistics NZ measures of quality and liveability. ‘Quality’ can be also be context and location specific. • There are many factors at play outside of urban development that influence all of these desired outcomes. How much of an impact will urban development have on the labour force and innovation? • The policy as it stands only sets out some of the principal elements of how well-being can be achieved. However some elements of wellbeing such as health, education, safety, improvements in environmental quality, and identity are completely ignored. • While O2 is necessarily high level, it needs more careful wording and should be backed up by guidance and references on what constitutes a “quality urban environment”. Currently it would be easy for almost any developer to argue that their development meets (a) – (d). • It is unclear what (b) means. Economies of scale may or may not be spatially expressed. • The council supports the requirement in (c) to use “land, energy and infrastructure efficiently” as it is one of the strongest links back to RMA principles. • MfE guidance on ‘quality’ urban environments, in particular on medium density housing (2012), needs to be updated.
<p>O3: To enable development in locations and in ways that maximise its positive and minimise its negative impact on, quality urban environments.</p>	<ul style="list-style-type: none"> • Applies to all urban environments. • Applies immediately • New objective 	<ul style="list-style-type: none"> • This objective could be deleted as it is unclear what the issue is. O2 in a much clearer form could suffice. • Part 2 of the RMA already addresses this. If the intention is to ensure development contributes to a quality urban environment, then this should be stated (though the document would need to be clearer about what constitutes a quality urban environment).

		<ul style="list-style-type: none"> • In many cases existing communities want character and amenity to remain, or be taken into consideration when densities are increasing. This issue needs to be more explicitly considered in this document and in the proposed objectives and policies. Under section 45(1) of the RMA, NPSs have to be relevant to achieving the purpose of section 5, and case law indicates that section 5 includes a consideration of the scale and significance of competing considerations.
<p>P2A: When making planning decisions that affect urban development, and the way and rate at which development capacity is provided, local authorities must have particular regard to:</p> <p>a) enabling a range of dwelling types and locations, working environments and business locations</p> <p>b) limiting as much as possible adverse impacts on the competitive operation of land and development markets. When making decisions on consent applications that affect urban development, and the way and rate at which development capacity is taken up, decision-makers must have regard to the need, consistent with this NPS, to:</p> <p>c) provide a range of dwelling types and locations, working environments and business locations</p> <p>d) limit as much as possible the adverse impacts on the competitive operation of land and development markets.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 policy PA3 	<ul style="list-style-type: none"> • The meaning of this policy is unclear e.g. what is a “range of working environments”? • The second part of the policy, around directly applying the NPS in making decisions on consent applications, is inappropriate. NPSs have effect through the hierarchy of planning documents, rather than acting as a final check on a decision as to whether or not to grant consent. The FDS is the right process for ensuring a range of business location is provided, and should not be undermined by opportunistic and unplanned urban forms, without regard to the broader land use and infrastructure strategy. This would be a loophole which would be certain to be exploited and will open the door for arguments on many consents as to the right balance between intensification and greenfield development. • It is more appropriate for the FDS and District Plan reviews to address any issues arising from “take-up rates” and sufficiency of the “range of dwelling types and locations”. Sufficiency of urban development is not a matter that should be addressed through ad hoc resource consent applications. This could lead to perverse outcomes such as poor integration of land use and infrastructure, and incremental urban creep, which over time could undermine the core planning principles of Greater Christchurch’s FDS (Our Space) and the Christchurch District Plan.

<p>P2B: When making or updating policies, plans and strategies, local authorities must have particular regard to:</p> <p>a) the positive impacts of urban development to contribute to a quality urban environment as described in O2</p> <p>b) the benefits and costs of urban development at national, inter-regional, regional and district scale, as well as locally.</p> <p>When making decisions on consent applications, decision-makers must have regard to:</p> <p>c) the positive impacts of urban development to contribute to a quality urban environment as described in O2 and</p> <p>d) the benefits and costs of urban development at national, inter-regional, regional and district scale, as well as locally.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 policy PA4 	<ul style="list-style-type: none"> • This policy reflects all the issues outlined above in respect of Objective O3. Without a clear articulation of what a “quality urban environment” is, it cannot be expected that the “positive impacts” of urban development will be able to be recognised. • As this policy is currently written, an increased rating base and/or Development Contributions resulting from any development, if applied appropriately, could lead to the regeneration or improvement of existing urban areas, and thereby contribute to a quality urban environment. The policy and any supporting guidance needs to be specific about what constitutes “positive impacts” and provide examples of how these matters can be had “particular regard to” in our plans. • With regard to (b), Councils are already required to evaluate alternatives and assess costs and benefits under section 32 of the RMA when considering urban growth and development through District Plan reviews and plan changes, and through Regional Policy Statement reviews. • Why should a District Council prepare a cost benefit assessment that extends to considering national or even regional growth? This would go beyond the functions of territorial authorities under section 31 of the Act and would contradict section 31(1)(aa), which limits consideration of development capacity of housing and development land to the expected demands of that district. • This policy says nothing about what an appropriate planning and policy response should be if costs are identified (urban development will almost always bring some costs), or if costs exceed benefits. • Rather than (b), there could be more value in looking at the cost to cities of different development scenarios e.g. intensification vs. greenfield vs. brownfield. Where is it going to be most cost efficient to focus growth, e.g. from an infrastructure point of view? • The second part of this policy could have the same unintentional outcomes as set out in the comments above on P2A. Also the contents of most of (d) would have no bearing on consent applications; certainly the benefits and costs of urban development at a national and inter-regional scale are not something consent planners would assess.
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Amenity values in urban environments (p.29)

<p>O4: Urban environments provide for the diverse and changing amenity values of individuals and communities.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • New objective 	<ul style="list-style-type: none"> • Not all urban environments need to feel, look and function the same. Some areas may either not be needed or preferred locations for development or redevelopment, i.e. they may not be near public transport routes, employment areas, community facilities, or may be areas of special character. • Successful cities are not all about density, rather about a mix of densities that complement each other i.e. more intensively developed areas interspersed with areas of larger sites and/or providing open space and trees. • O4 could be amended to: Urban environments provide for the diverse and changing amenity values of individuals and communities <u>and positive changes to those amenity values.</u> • There needs to be a discussion of how amenity values which change over time can be squared up with the RMA definition of amenity values, which does not include any suggestion that this could occur.
<p>P3A: In making planning and consent decisions, decision-makers must recognise that amenity values: a) vary among individuals and communities b) change over time.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • New policy 	<ul style="list-style-type: none"> • What is the purpose of this policy? If it is to indicate that change is required in some parts of urban areas away from current character and function, to achieve higher-order objectives such as consolidation, then this should be stated. This policy could be mixing up amenity and liveability, and it should also be considered against the NZ Urban Design Protocol. • Not all communities and individuals want a change in amenity. This policy is likely to be unpopular with the public, and may lead to further disengagement of the public from planning processes. Disengagement and a feeling of disenfranchisement is already evident in Christchurch both with the public and local politicians as a result of the recent fast track District Plan process, and the Greater Christchurch Regeneration Act. • It is worth noting that while amenity values may change over time, built form may not, e.g. villas being renovated and repaired in areas while density around them increases. • P3A as currently written will not assist in achieving the involvement of diverse communities in the planning process (text above the policy).

		<ul style="list-style-type: none"> P3A could be improved with the following addition: <u>c) can change positively or negatively. Decision-makers should seek to promote positive change in amenity values, for the widest possible benefit to communities and future generations.</u>
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Enabling opportunities for development (p.30)

<p>O5: To ensure local authority policies, plans and strategies enable enough opportunities for development to meet diverse demands for housing and business land</p>	<ul style="list-style-type: none"> Applies to all urban environments Applies immediately New objective based on NPS-UDC 2016 objective OA2 	<ul style="list-style-type: none"> “Local authority plans’ is not defined and is unclear. For example it could mean that Regional Councils have to undertake what are currently District Council functions under the current NPS on UDC.
<p>P4A: Local authorities must ensure at all times their plans enable at least enough development capacity that is feasible and likely to be taken up to meet the demand for dwellings (in terms of location, typology and price) and business land (in terms of location, floor area and extent of land) over the short, medium and long term. A local authority meets these obligations by ensuring: a) Short term – that the development capacity is enabled by resource management plans and serviced with development infrastructure b) Medium term – that the development capacity is enabled by resource management plans and either: i. is serviced with development infrastructure, or ii. the funding for the development infrastructure required to service that development capacity</p>	<ul style="list-style-type: none"> Applies to all urban environments Applies immediately Amended NPS-UDC 2016 policy PA1 	<ul style="list-style-type: none"> A number of elements to this policy are unclear. How is “likely to be taken up” going to be measured? Was the approach taken in Christchurch City Council’s last HCA appropriate? Should we be using average take-up rates over two, five or ten years to assess sufficiency? Is just extrapolating past take-up adequate to determine future “likelihoods of take-up”? We do not consider it likely to be adequate because, for example, investment in rapid transport corridors or changing school catchments could, over time, significantly change take-up rates for particular locations. This presents no solution to the difficult issues of feasibility already experienced with the current NPS. Land supply is only one factor in the delivery of development/development feasibility. There is a typo in P4A(c), which is currently shown as (a). To undertake this robustly for the long term is a resource hungry undertaking. See previous comments about the cost of development potentially being driven up by the need to provide infrastructure for growth over and above what is likely to eventuate.

<p>must be identified in a Long Term Plan required under the Local Government Act</p> <p>c) Long term – that:</p> <p>i. the development capacity is identified in all relevant plans and strategies (including the FDS)</p> <p>ii. the development infrastructure required to service it is identified in the relevant Infrastructure Strategy required under the Local Government Act 2002.</p>		
<p>P4B: As soon as a local authority determines that it cannot provide the required development capacity, it must notify the Minister.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 policy PA1 	<ul style="list-style-type: none"> • In itself this policy achieves nothing that cannot already be achieved by ensuring that at all times there is sufficient capacity, as required in the current NPS. If an actual shortage is allowed to develop, this would indicate a serious issue with current District Plan or other Council monitoring processes, or with implementation of the current NPS. Also, it is unnecessary to notify the Minister if Council is already committed to remedying a potential shortage of development capacity in the medium or long term, e.g. by initiating plan changes to rezone more land. • The Development Capacity under this policy should not include the infrastructure needed to provide for the 20%/15% buffers. Councils cannot fund, or include in business cases for infrastructure funding submitted to Central Government, the 20%/15% additional buffers above growth projections. • P4B could be amended to: <ul style="list-style-type: none"> <u>As soon as If</u> a local authority determines that it cannot provide the required development capacity <u>in the short term (excluding infrastructure capacity for the buffers), and cannot remedy a potential shortage of the required development capacity in the medium or long term</u>, it must notify the Minister.
<p>P4C: In providing development capacity, a local authority must be satisfied that the other infrastructure required to support urban development is, or is likely to be, available.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately 	<ul style="list-style-type: none"> • While this is a desirable situation and the adequacy of other infrastructure can be broadly assessed, councils do not have control over infrastructure provided by other agencies, e.g. the timing of provision of a new school by the Ministry of Education.

	<ul style="list-style-type: none"> • Amended NPS-UDC 2016 policy PA1 	<ul style="list-style-type: none"> • It is not clear that providers of other infrastructure such as the Ministry of Education and Orion will be using the same development projections as the Council, even though we supply them with the population growth information that they use for their planning. • Will the other government departments and infrastructure providers also be including the 20%/15% additional buffers above growth projections, and provide additional surplus infrastructure to satisfy them? Is including additional surplus infrastructure to satisfy the 20%/15% additional buffers, a whole of Government approach? • This policy does not clearly indicate what should happen if other infrastructure is not available when there is an area that would otherwise be suitable for development.
<p>P4D: Every local authority must set bottom lines for the total amount of development capacity it must provide to meet the demand (as determined under the most recent HBA) for dwellings. Bottom lines must:</p> <p>a) be set for both the medium term and the long term b) be reviewed every three years.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Inserted into plans within 12 months of HBA being completed • Amended NPS-UDC 2016 policies PC5-PC11 	<ul style="list-style-type: none"> • It is not clear why this policy has changed from the current terminology of housing “targets” to “bottom lines”. If this is to address business land as well as housing land this should be made clear, and the term “bottom lines” should be defined. It seems that they include the additional margins specified in AP3 and AP12, but this is not clear. • Setting a “bottom line”, without a maximum will make it difficult to balance the conflicting aspects of the NPS-UD and the NPS on Highly Productive Land (HPL). The NPS-HPL requires that highly productive land is protected, but recognises that it should not be a prohibition on development on HPL. Therefore in cities surrounded by HPL, like Christchurch, there will need to be a balance struck between protecting HPL and providing for urban development under the NPS-UD. With only a bottom line being set and no maximum, there is a risk that there is no limit to the amount of HPL that could be compromised. • The requirement for a three-yearly review should be from the first HBA, because it is possible that in order to get alignment with the LTP process, the next housing targets/bottom lines might be more than 3 years away.
<p>P4E: Regional authorities must incorporate a bottom line set under P4D in their regional policy statements.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Inserted into plans within 12 months 	<ul style="list-style-type: none"> • No change to current situation (unless to include business land)

<p>Territorial authorities must incorporate an appropriate proportion of every bottom line in their district plans, as informed by the strategic guidance in the current applicable FDS. This must be done without using the process in Schedule 1. [But note that Schedule 1 must be used when amending a plan to give effect to the bottom lines.]</p>	<p>of HBA being completed</p> <ul style="list-style-type: none"> • Amended NPS-UDC 2016 policies PC5-PC11 	
<p>P4F: If an HBA indicates that a bottom line in a policy or plan is inadequate in the medium or long term, the local authority must revise the bottom line and update their policy or plan accordingly</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Inserted into plans within 12 months of HBA being completed • Amended NPS-UDC 2016 policies PC5-PC11 	<ul style="list-style-type: none"> • The effect of this is highly dependent on what is meant by “bottom line”
<p>P4G: If an HBA or any other evidence or monitoring indicates that there is inadequate development capacity, the local authority must:</p> <ol style="list-style-type: none"> consider all options (under any legislation) to enable development, such as integrated and coordinated consenting processes increase development capacity by changing policy statements and plans, including changes to zoning, objectives, policies, rules and spatial layers that apply in existing urban environments and greenfield areas if the inadequacy relates to the long term, update its FDS consider all other options for increasing development capacity. 	<ul style="list-style-type: none"> • Applies to major urban centres • Response shall be initiated within 12 months of problem being identified • Amended NPS-UDC 2016 policy PC3 	<ul style="list-style-type: none"> • It is unclear whether P4G would allow urban growth beyond the RPS Projected Infrastructure Boundary • We already use integrated and coordinated consenting processes (e.g. integrated subdivision and land use consents) in our Residential New Neighbourhood zone, which covers greenfield development; however this can be unpopular with developers because residential land development and building development are frequently not undertaken by the same parties. • Even when land is zoned and subdivision consent has been granted, the costs of constructing roads and other infrastructure mean that developers often stage the release of sections so as to control supply, potentially maintain prices and margins, and finance the next stage of their development. Council cannot compel developers who are holding land to proceed to develop it or to release it to market until they choose to do so.

Ensuring plan content provides for expected levels of development (p.34)

<p>O6: To ensure local authorities:</p> <ul style="list-style-type: none"> a) make decisions on urban development based on the best available evidence b) respond promptly to evidence about changing demands for housing and business land c) identify the evidence on which decisions about urban development are made. 	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • New objective 	<ul style="list-style-type: none"> • The test of “best available evidence” should also be applied to the drafting of NPSs. It is not made clear throughout the discussion document that it has been fully informed by current local government practice. • Current RMA processes such as plan changes for rezonings already require section 32 evaluation reports. Plan changes are initiated as required to provide an adequate supply of land, and private plan change requests to rezone land are now possible in Christchurch since the removal of the OIC controlling the District Plan. • The current NPS-UDC and associated FDS have necessitated considerable resources and staff time but have not added equivalent value to existing local government land use, infrastructure planning and monitoring processes. For example Christchurch City Council already knew prior to commencing the HBA that its supply of industrial land was sufficient to cover even long term needs without the need to rezone additional industrial land. The recent District Plan review had carefully considered intensification and greenfield development and had ensured that the supply of residential land was adequate for the short, medium and long term periods.
<p>P5A: District plans must include, for each zone in an urban area, a zone description that describes the expected types and nature of development, [including expected levels of amenity], consistent with growth identified in the FDS.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Applies immediately • Amended NPS-UDC 2016 objective OC2 	<ul style="list-style-type: none"> • We understand that the intention is that councils monitor whether the specified type of development is occurring and respond if it is not. This is problematic, not least because even if we are very enabling, we cannot compel the market to respond and deliver diversity. See comments on P5C. • All six major urban centres already include zone descriptions in their plans. What the NPS-UD is seeking to achieve with this policy is already accomplished by zone objectives and policies for these plans. This new proposed policy does not make it clear whether these existing zone descriptions must be amended to match the ones in the National Planning Standards, although judging by the text preceding the policy, this could be the intention. • During the consultation on the Planning Standards, Christchurch City Council submitted in opposition to these zone descriptions being given

		<p>statutory weigh, because many of the zone descriptions are vague, not fit for purpose, and contrary to local strategic objectives. In some cases, giving statutory weight to the descriptions will work against the stated purpose of the NPS-UD itself e.g. by making it easier to use residentially zoned land for non-residential activities.</p> <ul style="list-style-type: none"> ● For example, the zone description for the <i>General residential</i> zone is: “Areas used predominantly for residential activities with a mix of building types, and other compatible activities.” Compared with the more specific and directive objectives in the current Christchurch District Plan, this zone description makes it easy for commercial developers or operators to argue that they should be permitted in residential zones as long as the zone is still “predominantly” residential. ● Other zone descriptions are equally problematic. For example, the zone descriptions for the <i>General rural</i> and <i>Rural production</i> zones enable “associated rural industry” as opposed to “ancillary”. This means that any industrial activity with any connection to rural industry (e.g. canneries, timber mills, meat processing plants, tractor tyre factories) can anticipate being able to local in rural zones, including in zones intended to protect versatile soils. ● The zone descriptions for the <i>General Industrial</i> zone, <i>Mixed use</i> zone and <i>Airport</i> zone do not enable strategic directions to manage retail or office distribution outside of commercial centres. ● Policy P5A is proposed to apply to major urban centres “immediately” whereas Christchurch City Council is not required to implement the National Planning Standards for another seven years and is not anticipating doing this ahead of its next District Plan review. ● To be clear, the zones in the Planning Standards do not align with the zones in our current District Plan. A number of zone descriptions will be difficult to implement in the context of the Canterbury Regional Policy Statement, which includes policies requiring the avoidance of urban activities outside of the identified urban area. A national direction to implement the zone descriptions in the Planning Standards “immediately” would undermine the
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		<p>strategic objectives in the current Plan in addition to being inconsistent with the RPS.</p> <ul style="list-style-type: none"> • The Council also strongly recommends that the zone descriptions in the National Planning Standards be revised urgently if there is any intention to ever give them statutory weight. In the Council’s view, they do not represent best planning practice. • We understand that this is why, in part, the Ministry removed the requirement to include the zone descriptions when the first set of National Planning Standards was gazetted.
<p>P5B: Territorial authorities must:</p> <p>a) make an assessment to ensure the objectives, policies, rules, and assessment criteria set out in district plans are individually and collectively consistent with the expected development for each zone as described in the zone description</p> <p>b) enable the development of the zone to occur as described in the plan</p> <p>c) monitor and report on whether development is occurring as described in the plan as a component of section 35 efficiency and effectiveness monitoring.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Applies at next plan review or when implementing the planning standards • New policy 	<ul style="list-style-type: none"> • It would be simpler, more cost effective and more useful to monitor whether or not specific housing development targets in the policy or plan are being met as opposed to monitoring all development and then assessing whether or not it is consistent with relatively vague zone descriptions such as “predominantly residential”, “predominantly industrial” etc. • There would be significant costs associated with this type of monitoring, especially for major urban centres where there are potentially thousands of vacant sites or sites being developed in any given year. It is very unlikely that the outcome of that monitoring would show that development was not consistent with these descriptions. • It would be more useful to require the HBA to identify specific development targets (i.e. X number of new dwellings; Y% of new dwellings at a specified density; Z% of new development being infill development, etc.) and to integrate these into the objectives and policies of the relevant plans and policy statements.
<p>P5C: If monitoring indicates that development capacity is not being taken up to achieve the development expected in a zone, the local authority must undertake a review to understand why, and:</p> <p>a) change relevant objectives, policies, rules and assessment criteria through a plan change to the</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Applies immediately • New policy 	<ul style="list-style-type: none"> • This policy seems to assume that the reason available zoned land isn’t always taken up is because of planning rules. In Christchurch there are very liberal planning rules and not all opportunities are being taken up. Other factors have a major influence and need to be considered. • It would be more useful for central government to first establish what really drives housing markets, and secondly implement appropriate government intervention to resolve the issues identified. Housing markets are driven by a multitude of factors other than planning (particularly when as in

<p>extent needed to achieve the development expected, and/or b) identify any constraints outside their resource management plans to achieving the expected development for the zone.</p>		<p>Christchurch there is in fact no shortage of residential or business land), including fiscal and monetary policy, immigration policy, the nature of the construction industry in New Zealand, supply chain issues, etc.</p> <ul style="list-style-type: none"> • Policy P5C would require development targets to be zone-based. As long as we are meeting the District-wide targets for new dwellings and other monitoring indicates an acceptable level of amenity, it may not matter which zone the take- up of development capacity is occurring in, and if it does, this is essentially a local not national issue. It should not be necessary to undertake a costly plan change process because, for example, more development is occurring in medium density suburban zones as opposed to specified greenfields areas than was anticipated. • When given a choice and affordability isn't an issue, we know that preferences around where people choose to live are largely driven by lifestyle preferences – e.g. "I enjoy living near the hills", and preference drives behaviour. We do not believe that changing Plan provisions will change this. • P5C(b) could be amended to: Identify and address any constraints, outside their resource management plans and over which it has control, to achieving the expected development for <u>the zone broad zone categories (eg residential, industrial, commercial and mixed use zones)</u>.
<p>P5D: When making planning decisions that affect the development of urban environments, local authorities [should? must?] demonstrate analysis that includes: a) a clear articulation of the resource management matters being managed b) an assessment of the costs and benefits of different options for urban development and their contribution to achieving a quality urban environment (as described in Objective 1)</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Applies immediately • New policy 	<ul style="list-style-type: none"> • There appears to be a word missing in the draft policy (see potential insertion) • This policy does not add anything which is not already required in section 32 assessments for district plan reviews and plan changes, and in HBAs and FDSs. We suggest the policy is deleted. • Christchurch City Council already has a Strategic Objective in its District Plan, Objective 3.3.2, which includes "setting objectives and policies that clearly state the outcomes intended". • As already noted, the policy refers to the concept of "a quality urban environment", which is very poorly articulated in this discussion document.

<p>c) an assessment of the impact of different urban development options on providing enough development capacity</p> <p>d) an assessment of regulatory and non-regulatory options for contributing to a quality urban environment and providing enough development capacity</p> <p>e) an analysis of consistency with the relevant FDS</p> <p>f) demonstration that they have been informed by relevant evidence and monitoring required under this NPS.</p>		
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Providing for intensification (p.36)

<p>O7: To provide for the benefits of urban intensification by allowing for increased density in areas where those benefits are best realised.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • New objective 	<ul style="list-style-type: none"> • The first part of the objective “to provide for intensification” does not explain what intensification would achieve in terms of better environmental outcomes, e.g. more people living closer to their place of employment and to the amenities and services they use on a regular basis, so that travel times are reduced and infrastructure is used efficiently. The objectives of intensification need to be made much clearer e.g. reduce urban sprawl, enable people to access services they need (not necessarily by public transport), promote urban renewal, provide a range of housing opportunities, support centres/central city. • The second part of the draft objective is not an objective but rather a policy or course of action (by allowing for...).
<p>P6A: Enable higher-density development, especially in areas where there are one or more of the following</p> <p>a) proximity to many employment opportunities</p> <p>b) urban amenities and services are easily accessible by existing or planned active transport and public transport networks</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Plan changes to be notified within 18 months of gazetting the NPS-UD 	<ul style="list-style-type: none"> • All major urban centres in NZ are already doing this in its entirety. The Christchurch District Plan already has policies in place that enable all of this. • The other NPS requirements already point in this direction i.e. assess whether there is sufficient capacity, and if not, consider all practicable options and have regard to other national guidance and respond accordingly.

<p>c) high demand for housing d) best use can be made of existing or planned infrastructure, services and facilities.</p>	<ul style="list-style-type: none"> • New policy 	<ul style="list-style-type: none"> • It should be noted that these are not the only matters that should be the determinants of which areas are up-zoned. Christchurch has taken additional matters into account when determining where higher density development is appropriate. These include need, the presence and level of risk from natural hazards (importantly for Christchurch), and heritage/character of areas.
<p>P6B: Regional councils must include the following objective into their regional policy statements: To enable residential intensification that ensures the efficient use of existing urban land, infrastructure, services and facilities.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Applies immediately • New policy 	<ul style="list-style-type: none"> • “Residential intensification” is not defined. The policy does not appear to include residential intensification within greenfield areas, because it is only referring to efficient use of “existing urban land”, rather than also to land within future development areas. • If what is being directed here is to make the most of the redevelopment potential of the existing urban area, such to avoid unnecessary expansion into rural areas through greenfield development, this should be stated. • The approach to greenfield development in this NPS is fundamentally flawed. It would be better to have a policy focused on ensuring that subdivision and land use are integrated and at a density that creates truly liveable neighbourhoods.

Options for directing intensified development (p.37)

<p>P6C Option 1: descriptive approach</p> <p>District plans must zone for higher-density residential activities within a suitable catchment area (ie, accessible by active transport modes) around frequent public transport stops and centres.</p> <p>Higher-density residential activities are those with a concentrated bulk of buildings such as terraced housing and apartments.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Plan changes to be notified within 18 months of gazetting the NPS-UD • New policy 	<ul style="list-style-type: none"> • Definitions are needed of the following terms: ‘suitable catchment’, ‘frequent’, ‘active transport modes’, ‘concentrated bulk of buildings’, and ‘centres’ (including using the word ‘commercial’), because presumably the policy is not intended include local centres. • Christchurch City has “Key Activity Centres” around which medium-density development (30hh/ha) is to be appropriately located, because those centres have a variety of facilities and services on offer. For high-density enabled (60hh/ha) living, this range of facilities and services would need to be more comprehensive. • Frequent public transport needs to be high quality public transport with dedicated routes (e.g. busway or train services). Where public transport relies on buses that stop frequently and also get stuck in traffic, it is not a high quality option.
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		<ul style="list-style-type: none"> • The current wording of the policy is vague and problematic – one could interpret it to mean that anywhere that has a footpath is accessible by active transport, and should be densified. • Such a policy needs to factor in the type of public transport and the frequency, as well as future intentions for the integration of transport and land use. A corridor with a current bus service may be suitable for a high frequency rail service once critical mass of development/population is achieved in the future, and zoning changes may need to reflect that intent now. Conversely, areas nearby with a current bus service may not need to be enabled for more density and to do so may be counter-productive to achieving critical mass of development in the first set of areas. • Option 1, if better articulated, would be preferable to the more prescriptive Option 2, because it would allow local interpretation in the context of that city. • Option 1 is also better suited to long-term planning for future transport infrastructure, and to planning for comprehensive upgrades to public environments. This includes broad planning provision for non-Council infrastructure such as schools and medical services.
<p>P6C Option 2: prescriptive approach District plans must:</p> <p>a) zone for high-density residential activities within an 800m walkable catchment of centres and frequent public transport stops, except where evidence demonstrates intensification should not be enabled; and</p> <p>b) zone all residential and mixed use areas within 1.5 km of city centres for high-density development.</p> <p>High density is where there is a minimum overall density of 60 residential units per hectare.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Plan changes to be notified within 18 months of gazetting the NPS-UD • New policy 	<ul style="list-style-type: none"> • Option 2 is a policy reflecting a focus solely on Auckland. It is inappropriate for Christchurch and could have perverse implications. • The attached map gives some idea of the significant spatial implications of applying this policy to Christchurch. • The direction should simply be, that if it is established that there is any shortfall in residential capacity identified in an HBA, then intensification should be looked to in the first instance to address this. This policy oversimplifies the issue of housing capacity and the solution. In fact in the case of Christchurch, it is a “solution in search of a problem”. • The policy requires a much more nuanced approach with spatial and physical attributes mapped that are appropriate for that city/place. Quality urban places are those which also recognise the particular characteristics of a place that people identify with i.e. neighbourhood physical and social connections, heritage, character, and landscape attributes. • The focus in this policy is on residential density, but it really needs to be on neighbourhoods i.e. the 800m in proximity to a frequent transit stop should not be

		<p>the only factor driving residential up-zoning; rather the quality of the neighbourhood (services and facilities offered, amenity etc) is a better measure.</p> <ul style="list-style-type: none"> • An 800m radius at the densities proposed may not be appropriate to all centres. A more nuanced approach in Christchurch might be to provide for 400m high density catchments in the first instance, and if high quality transit is provided, a further 800m for medium density. • 60 hh/ha is probably not needed at all in Christchurch and some other centres. Unless significant changes are made to ensure an appropriate quality and typology of housing, the increased density expected around commercial centres (over and above the current 30 hh/ha) and within the Central City (over and above the current 50 hh/ha) could be counter-productive, and result in poor quality outcomes. The Council is only one player attempting to ensure an appropriate quality and typology of housing, and it does not have total control over outcomes. • 60hh/ha will simply be too high a density in some receiving environments and is hard to achieve for small-scale developers who tend to focus on one or two sites. Site-by-site development tends to deliver acceptable outcomes in the 30 to 50 hh/ha range (but not always good quality). Good development outcomes at 60hh/ha can be achieved, but do need sites of appropriate size and shape, and preferably good locations within existing urban blocks (e.g. corner sites). Ideally development at this density is best achieved with block-level site amalgamation or at least where a number of sites form a comprehensive development project. This is often difficult to achieve in the NZ context. • 80hh/ha is also referred to in the discussion document, so it needs to be clear what is proposed. • More restrictive (increased density) zoning in central areas may encourage greater take-up of lower densities in the outer suburbs or adjacent districts, particularly since transport is not a serious limitation in Christchurch. Cross-city trips to work, and satellite centre trips to work in the central city are common and not unduly time-consuming. There is good evidence that high rates of residential land take-up in adjacent districts post-earthquakes have not only been a result of the push factors of the earthquakes and land and building damage in Christchurch, but also of a strong demand for the type of low-density development (around 10-12 hh/ha) occurring in greenfield areas in Selwyn and Waimakariri Districts. If density is
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		<p>increased in central areas and along key public transport corridors, it would be necessary to consider higher minimum densities in high growth greenfield areas, e.g up to 20-25hh/ha.</p> <ul style="list-style-type: none"> • The wording of the policy is unclear as to whether either or both attributes cited in (a) are required, e.g. does it direct intensification along public transport routes, regardless of whether or not there is access to services within 800m? There is no assessment of the quality of the public transport service or of the walking environment. • With regard to within “1.5km of city centres”, a definition of ‘city centre’ is required, i.e. does this mean the geographic centre, or does it relate to the commonly-understood boundary of the city centre (in Christchurch’s case, is the distance from the Cathedral Square or the Four Avenues? This makes a great difference. • A blanket prescribed minimum density ignores Christchurch’s hierarchy of commercial centres, and differences in infrastructural capacity already planned for. Changes in density can only be achieved over decades and retrospectively upgrading infrastructure can be inefficient and expensive. • P6C could be improved as follows: District plans must: a) zone for high-medium density residential activities within an 800m walkable catchment of metropolitan, town, or neighbourhood¹ centres and /or frequent rapid² public transport stops, except where evidence demonstrates intensification should not be enabled particularly in terms of the matters of national importance under section 6 of the RMA, protection of highly productive land, and the maintenance and enhancement of community amenity and character; and b) zone all residential and mixed use areas within 1.5 km of city centre zones¹ for high-density development. High density is where there is a minimum overall density of 60 residential units per hectare.
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¹ Based on the definitions in the National Planning Standards

² Defined as rail or Bus rapid transit (segregated bus ways)

		<u>Medium density is where there is a minimum overall density of 30 residential units per hectare.</u>
<p>P6D: Territorial authorities must include the following policy in their district plans: When considering an application for a higher-density residential activity than is currently provided under this plan, the consent authority must have particular regard to whether:</p> <p>a) the site is in an area that is required under the NPS-UD to enable intensification b) the development will provide more choice of housing.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Applies immediately • New policy 	<ul style="list-style-type: none"> • S104(1)(b)(iii) of the RMA already requires TAs to have regard to National Policy Statements when considering applications. This policy is unnecessary. • What is meant by housing choice should be clarified. Christchurch City’s District Plan is already very enabling. There are no maximum densities in Christchurch City. Densities are effectively limited in some zones by maximum heights and minimum site sizes, and other built form standards, but all of these standards are able to be exceeded by resource consent if matters of discretion can be satisfied. • We already have medium densities provided for in lower density areas, through the Enhanced Development Mechanism and Comprehensive Housing Redevelopment Mechanisms in the District Plan. The qualifying criteria for these mechanisms are wider than those set out in this proposed policy.

Providing for further greenfield development (p.39)

<p>Example policy: When considering a plan change that enables urban development that is not otherwise enabled in the plan, local authorities must provide for urban development when all of the following apply:</p> <p>a. Development enabled by the plan change would contribute to a quality urban environment, including access to transport choice;</p> <p>b. Development enabled by the plan change would not have adverse effects on protected areas or areas identified for restoration;</p> <p>c. Development under the plan change can occur in a way that is appropriate, safe, and resilient in the long term in respect of</p>	<ul style="list-style-type: none"> • New policy • Would only apply to plan changes, not resource consents 	<ul style="list-style-type: none"> • This policy is unnecessary and poorly written. Christchurch’s District Plan, in combination with section 32 of the RMA, already provides for careful consideration of all of these matters through either of the Council plan change or private plan change processes. • There is already effectively a presumption in favour of development where overall benefits outweigh overall costs. • It is unwise to presume that all factors that might be relevant to consideration of the RMA merits of a plan change for rezoning for urban purposes, can be specified in advance and in one policy. District plans contain entire chapters on strategic directions for a city including objectives and policies for urban growth, and on each of the topics in a-e, and may still be deficient in their coverage. • What is meant by a quality urban environment; transport choice; resilient; and appropriately managed, in this context? Whether or not plan changes could be approved could not be decided by this policy. Such decisions could only be made by reference to other more specific District Plan provisions.
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<p>natural hazards and the effects of natural hazards;</p> <p>d. Reverse sensitivities are appropriately managed within and adjacent to the location or locations that are the subject of the plan change;</p> <p>e. Infrastructure to enable the long-term development of the land can be provided.</p>		<ul style="list-style-type: none"> • This policy ignores the requirement in the RMA and in section 32 for consideration of other higher order planning documents such as other NPSs, NESs, and regional policy statements and plans. It also ignores the need for planning decisions in Christchurch to not be inconsistent with plans under the Greater Christchurch Regeneration Act e.g. the Land Use Recovery Plan. • Leap frogging the urban boundary is a major issue and contrary to the planned ethos of the NPS. It could be worthwhile to consider a process of “call for sites” to co-ordinate “offers”, as is done in the UK. • The Policy could be improved with the following criteria added: <u>Development enabled by the plan change is not located on highly productive land;</u> <u>Development is designed to promote mode shift to public transport, and is located within 800m walking distance of a rapid public transport stop.</u>
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Removing minimum car parking requirements (p.42)

<p>P7A Option 1</p> <p>Local authorities must remove any district plan rule or standard that requires the provision of car parking for any activity.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Removal of plan rules within 18 months of gazetting the NPS-UD 	<ul style="list-style-type: none"> • It would be useful to clarify if this is intended to apply to on-site parking only or if also to off-site parking for any activity. • It is inaccurate to state that each site is usually required to provide for its own peak demand (p40 of the document). It is some decades since this was the case in Christchurch City. The Council has a policy, outside the Central City, of enabling a reduction in the number of car parking spaces required, subject to provisos (Policy 7.2.1.4 of the District Plan). There was also a general “reduction” in parking standards in the recent District Plan Review. • The Council supports the removal of all parking requirements in some circumstances as it can enable sites to be used more efficiently, e.g. the District Plan and CCC Parking Plan already set out situations where no on-site parking is required, such as in the Central City. • The Council is currently undertaking a process under section 71 of the Greater Christchurch Regeneration Act to remove minimum parking standards in the Lyttelton commercial centre from the District Plan. The parking regulations appear to be
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		<p>discouraging the regeneration of the commercial centre due to the impracticality of meeting standards where sites are narrow and the topography is constraining.</p> <ul style="list-style-type: none"> • It would also be useful to have clarity on whether councils can or should use maximums to manage parking. Post-earthquakes, developers in the Central City have often provided some on-site parking even though there is no District Plan requirement to do so, and several dedicated parking buildings have been built or rebuilt. Would carpark buildings be covered by this policy? • Any removal of parking requirements would need to be phased in as public transport is improved, otherwise this could cause significant congestion and safety issues in the short and medium term, with competition for limited on-street parking e.g. around new commercial areas. • Removing the ability to impose maximums would not support a mode shift from car use. • On-street parking would need to be managed efficiently for businesses and residents, given that the city is still going through a rebuild, and public transport is not yet either fast or widely patronised. • Some land uses require more on-site parking or parking available in the near neighbourhood than others, e.g. there is a longstanding problem with Public Hospital parking in Christchurch, both for visitors and staff. Having little or no parking available results in personal safety concerns at night time where no public transport is available, with staff having to walk reasonably long distances to and from work. Parking requirements for medical centres need to be considered carefully. • Removal of parking standards must not include the removal of mobility and cycle parking standards.
<p>P7A Option 2 District plans must not regulate car parking using minimum parking requirements.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Removal of plan rules 18 months of gazetting the NPS-UD • New policy 	<ul style="list-style-type: none"> • Comments as per those above. This option is not significantly different to Option 1, since most parking requirements are minimums. • It is unclear what “regulate” means, although in the context of District Plans it should mean rules. It would be clearer if consistent terminology was used, as regulation can also occur outside the Plan e.g. through neighbourhood parking schemes.

<p>P7A Option 3</p> <p>District plans must not regulate car parking using minimum parking requirements in medium- and high-density residential, commercial and mixed use areas.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Plan changes to be notified within 18 months of gazetting the NPS-UD • New policy 	<ul style="list-style-type: none"> • Again, the use of the word “regulate” is confusing. • This option supports the strategic direction of the Government Policy Statement on Land Transport by supporting mode shift in medium to high density areas, where access to employment, education etc. should be easier. • Removing minimums in these areas would support the enhancement of urban form by the “re-use” of space. For example, implementing cycle infrastructure or planting trees within these areas will create more liveable and healthy streets. This will also encourage active travel within and into and out of these areas by integrating current land use with sustainable transport. • There is a hidden cost associated with an oversupply of parking. This needs to be recognised and policy and rule changes made, which this option supports. Providing too much car parking is an inefficient use of sites, reduces potential residential and commercial floor space and increases congestion. • This option would help support the long-term integration of land use and transport. As areas become denser, managing parking from the outset will relieve and reduce congestion in the future. • However, without more central government funding and support to achieve a transport mode shift and significantly better public passenger transport, the removal of parking requirements will result in negative consequences, especially in terms of parking spillover and decreased access for the disabled and service providers.
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More directive intervention to enable quality urban development

<p>Should more direct intervention using NESs or a National Planning Standard, preclude or replace certain rules in District Plans?</p> <p>Rules that could be considered:</p> <ul style="list-style-type: none"> • Height or height in relation to boundary, which limit upward development • Density and subdivision standards, which constrain the size of properties or no. of houses per property 	<ul style="list-style-type: none"> • New policy • Would only apply to plan changes, not resource consents 	<ul style="list-style-type: none"> • Care is needed when restricting development envelopes, and attention needed to specific circumstances. • Low temperatures and sun angles mean that separation and access to sunlight is important in Christchurch. It may be appropriate to look at ways to manage this but removing height in relation to boundary would have adverse consequences. HIRB rules are most effective in high density areas, because of the increased development pressure creating more “conflict” between properties. They can be more about the overshadowing of people’s back gardens from the row of houses behind than from other houses in the
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<ul style="list-style-type: none"> • Private open space, which may not respond to the potential to leverage public or shared outdoor spaces • Site coverage, which limits the amount of a property that can be covered by buildings • Minimum floor areas/apartment sizes, which reduce the variety the market can offer. • Minimum lot sizes, to enable greater variety and choice in properties and houses. 		<p>same development (which is not a problem in the current system). This means that stating that they are most relevant for detached housing (p45 of the discussion document) is missing the point. These rules play an important role in protecting amenity.</p> <ul style="list-style-type: none"> • A national direction for a minimum height in a certain areas would be draconian. For example, requiring three storeys in a previously low-density area such as in the Residential Suburban Zone in Christchurch, in which single storey houses often predominate and two storey houses are uncommon, is not the best way to increase density. • Minimum floor areas are almost always the result of covenants imposed by developers to ensure large houses and high house values in new subdivisions, not of local authority rules. The best way to change this situation would be to legislate to prohibit restrictive covenants on floor areas. We understand that this has been done in Australia. • A higher minimum density is the best way to increase housing variety in greenfield areas. This appears to be successful in Brisbane, where average densities of 20hh+ are standard even in greenfield areas. • Note that most medium-high density zones already allow for three storeys, but that in Christchurch they are often not built because of the cost of building, as opposed to the zoning. • If sufficient residential capacity is available for the short, medium and long term, it does not seem necessary to amend these rules. • NZ has already seen issues arise in the 1990s and 2000s when minimum liveable spaces were not provided in some developments in Auckland. While not all residential units need to have a large floor space, liveability and quality dictate a minimum room size e.g. for master bedrooms and living spaces, to enable furniture to fit in.
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Evidence for good decision making

Using market information to make decisions (p.47)

<p>O8: To ensure every local authority with an urban environment has a robust, comprehensive and frequently updated evidence base about its urban environments.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately 	<ul style="list-style-type: none"> • We agree that it is appropriate to monitor key indicators.
<p>P8A: Local authorities must use evidence and information about the land and development markets for dwellings and business land, and reflect this in their section 32 reports.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • New policy 	<ul style="list-style-type: none"> • We agree that where appropriate, plan changes should draw on as many information sources as possible. • Most plan changes will be giving effect to a higher order land use strategy such as a Future Development Strategy or a Regional Policy Statement, or both, that will have already used this information to inform their development.
<p>P8B: Local authorities must monitor a range of indicators, including the following, on a quarterly basis, to ensure they are well-informed about their markets for housing and business development capacity, and urban development activity and outcomes:</p> <ol style="list-style-type: none"> a) prices and rents for housing, residential land, and business land by location and type, and changes in these over time b) the number of dwellings receiving resource or building consents relative to the growth in households c) the type and location of dwellings receiving resource or building consents d) the housing price to cost ratio e) indicators of housing affordability f) available data on business land. <p>Local authorities must publish the results of their monitoring of indicators at least annually.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 policy PB6 	<ul style="list-style-type: none"> • The Council has previously argued, and continues to hold the view, that quarterly monitoring is too onerous and unnecessary, and that biannually would be sufficient to indicate trends. • We support the reduced requirement to publish the results of this monitoring on an annual rather than a quarterly basis.

<p>P8C: Local authorities must:</p> <p>a) use information from indicators of price efficiency in their land and development market as it becomes available</p> <p>b) analyse that information to understand how well the market is functioning and how planning may affect this, and when additional development capacity might be needed</p> <p>prepare and publish a report on the analysis.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Applies immediately • Amended NPS-UDC 2016 policy PB7 	<ul style="list-style-type: none"> • There are known issues with the use of price efficiency indicators. These perpetuate a misunderstanding that higher urban land values indicate that the land market is operating inefficiently, when instead those large differences in value reflect efficient urban growth patterns³ <p>http://www.marketeconomics.co.nz/LiteratureRetrieve.aspx?ID=215762</p>
<p>P8D: Local authorities must assess demand for housing and business land, and the development capacity required to meet that demand in the short, medium and long term.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies in time to inform major plan changes • New policy 	<ul style="list-style-type: none"> • This is already required by the existing NPS e.g. PA1, which requires an assessment of sufficiency. Sufficiency can only be assessed by looking at both demand and supply. • Prior to the existing NPS, Christchurch City Council already monitored the supply and take-up of zoned industrial, commercial and residential land. The key element added by the existing NPS was the need to specifically assess demand for the various time periods.

³ Fairgray (June 2019) Making Room from Growth – A Strategy founded on Poor Economics

Engagement on urban planning

Taking into account issues of concern to iwi and hapū (p.51)

<p>O9: Urban development occurs in a way that takes into account resource management issues of concern to iwi and hapū.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • New objective 	<ul style="list-style-type: none"> • In this section there is variable use of the words “issues” and “aspirations”. The objective should focus on environmental outcomes. • It is worth noting that the “issues” seen at Ihumatao relate to history, identity and cultural values, and that none of these are considered in this NPS in its discussion of “quality urban environments”. • This objective needs to be considered alongside and against objectives such as O2, which relate only to selected elements of the urban environment. A wider discussion of quality and good urban design would also assist.
<p>P9A: When preparing a proposed policy statement, plan or strategy that affects how development capacity is provided for in urban environments every local authority must:</p> <p>a) provide iwi and hapū with opportunities to identify the resource management issues of concern to them relating to urban environments; and</p> <p>b) indicate how those issues have been or will be addressed in the proposed policy statement, plan or strategy.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • New Policy 	<ul style="list-style-type: none"> • Where there is an existing Iwi Management Plan (in this case the Mahaanui Iwi Management Plan 2013) Council is already required by section 74 of the RMA to take account of this IMP when preparing or changing its Plan. Schedule 1 Clause 3 reinforces this, and there is also now a duty under Schedule 1 Clause 4A, to consult again after a draft has been prepared and before notification. Therefore consultation has to, and does in the case of Christchurch City Council, occur on all plan changes and plan reviews. This includes those that affect how development capacity is provided for in urban environments, e.g. plan changes for rezonings or changes to rules to provide for more intensification; consultation has also occurred in regard to proposals under the Greater Christchurch Regeneration Act where Te Rūnanga o Ngāi Tahu is a strategic partner. • Under section 32 of the RMA, local authorities already have to indicate what advice concerning the proposal was received from iwi authorities under the Schedule 1 provisions and also the response to that advice. • In light of all these provisions, Policy 9A adds very little.
<p>P9B: When preparing a proposed policy statement, plan or strategy that affects how development capacity is provided for in urban environments every local authority</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies 	<ul style="list-style-type: none"> • As above, this will always happen anyway. • Christchurch City Council has a strong relationship with Mahaanui Kurataiao Ltd, a Ngāi Tahu resource and environmental management advisory company set up in 2007 by the six local Rūnanga with mana whenua rights over the Christchurch area, to represent their interests in the RMA process.

<p>must:</p> <p>a) provide hapū and whānau with opportunities to identify their aspirations for urban development on whenua Māori within their rohe</p> <p>b) take into account their aspirations for urban development on whenua Māori within their rohe.</p>	<p>immediately</p> <ul style="list-style-type: none"> • New Policy 	<ul style="list-style-type: none"> • The Council worked jointly with a mana whenua working party throughout the District Plan Review process, to ensure that mana whenua interests were appropriately represented in the District Plan both in general terms and in terms of specific papakainga provisions. • Some of the local Rūnanga have current development aspirations for Māori land within the various parts of the papakainga zone in the District Plan, and the Council is working proactively with these Rūnanga and their representatives.
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Coordinated Planning (p.53)

<p>O10: To ensure decisions within local authorities and across local authority boundaries are coordinated and aligned with the provision of development and other infrastructure.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 objective OD2 	<ul style="list-style-type: none"> • Local authorities already coordinate with each other with regard to the provision of development and other infrastructure across local authority boundaries. For example Selwyn District Council used to send sewage from at least Prebbleton north to Christchurch City Council’s sewerage reticulation system for eventual treatment at Bromley, but Selwyn District has had to develop its own separate treatment systems for its main settlements in recent years, in response to rapid growth in its District. Selwyn stills send sewage from Tai Tapu to Christchurch for treatment.
<p>P10A: Local authorities that share jurisdiction over an urban environment are strongly encouraged to work together to implement this NPS, having particular regard to cooperate and agree on:</p> <p>a) the provision and location of feasible development capacity required by it; and</p> <p>b) principles and practices for partnering with iwi and hapū.</p>	<ul style="list-style-type: none"> • Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 policy PD1(b) 	<ul style="list-style-type: none"> • Christchurch City has been cooperating and working with adjoining councils on a combined subregional growth strategy since the Urban Development Strategy of 2007. This strategy was subsequently translated into the RPS, and reviewed and updated in 2016. • The three Councils collaborated in developing their HBAs under the existing NPS-UDC, and in producing their Future Development Strategy, Our Space, which was finalised earlier this year. • Each Council already has similar practices for partnering with iwi and hapū. This is made relatively straightforward by the ability to work through MKT as outlined above, as they represent and work for example with Tuahiriri, the Rūnanga with the largest “rohe” in Greater Christchurch, covering most of Waimakariri District and the flat areas of Christchurch City.

		<ul style="list-style-type: none"> Christchurch City Council has a Ngāi Tahu partnership team, and a Council Standing Committee on the Council/ Ngāi Tahu partnership, the Te Hononga Council- Papatipu Runanga Committee.
<p>P10B: Local authorities must work with providers of development and other infrastructure to</p> <p>a) achieve integrated land use and infrastructure planning</p> <p>b) implement policies P4A and P4C.</p>	<ul style="list-style-type: none"> Applies to all urban environments Applies immediately Amended NPS-UDC 2016 policy PD2 	<ul style="list-style-type: none"> There is no change here from the existing NPS-UDC and from existing good planning practice. However, note the comments in response to the questions document to the effect that providers of other infrastructure have been uninterested in the existing NPS and some have chosen not to engage at all.
<p>P10C: Local authorities that share jurisdiction over a major urban centre are strongly encouraged to collaborate and cooperate to agree on:</p> <p>a) the preparation or review and content of a joint HBA</p> <p>b) the specification and review of the bottom lines required under this NPS</p> <p>the development or review of a joint FDS.</p>	<ul style="list-style-type: none"> Applies to major urban centres Applies immediately Amended NPS-UDC 2016 policy PD3 	<ul style="list-style-type: none"> The Council is already fulfilling this requirement.

8. Timing

Time	Requirements	Comments
Immediately from date of gazettal	<ul style="list-style-type: none"> All objectives in the NPS-UD apply Policies on quality urban environments, amenity, enabling opportunities for development, ensuring plan content provides for expected levels of development, issues of concern to iwi and hapū, and coordinated planning apply 	<ul style="list-style-type: none"> The important issue is not when objectives and policies apply, but making them more meaningful before they do. At present the draft NPS objectives and policies add little to the current NPS in regard to development capacity and coordinated planning, and add little to what is already occurring in local government planning and infrastructure planning, including in regard to planning for expected levels of development and working with iwi and hapū in planning processes.
Quarterly	<ul style="list-style-type: none"> Monitor housing indicators 	
Within 18 months of	<ul style="list-style-type: none"> Policies on providing for intensive development apply Policies on removing car parking minimums apply 	<ul style="list-style-type: none"> Council strongly opposes the 18-month timetable for imposing policies providing for intensive development. The policies need to be substantially rewritten before they would be appropriate for adoption.
Every 3 years	<ul style="list-style-type: none"> HBA policies must be undertaken in time to inform the FDS Policies on setting bottom lines apply (within 1 year of HBA being completed) 	<ul style="list-style-type: none"> While removing car parking minimums has some merit, this needs to be done based on circumstances and as public transport develops, rather than being imposed from national level.
		<ul style="list-style-type: none"> HBAs should inform the FDS, and equally the FDS should inform the LTP, however this sequencing is unlikely to be viable at present due to the long lead-in times for preparing LTPs. See above comments on timing of HBAs/FDSs/LTPs.

Appendix 3: Policies on Housing and Business Development Capacity Assessments

<p>Summary of the Proposals</p>	<p>Main changes include:</p> <ul style="list-style-type: none"> • Clarification of what to include in estimates of development capacity that is feasible and likely to be taken up in the short, medium and long term. These changes: <ul style="list-style-type: none"> -Include development infrastructure funded or financed by a third party. 	<ul style="list-style-type: none"> • This listing does not distinguish between network utility (bulk) infrastructure, and local infrastructure (connecting infrastructure and internal infrastructure within subdivisions), which is already normally funded by developers. This latter category of local or reticulation infrastructure is not adequately recognised or dealt with in either the existing NPS or in this proposed NPS. Just because third parties (developers) fund local infrastructure, does not mean that adequate network utility (bulk) infrastructure is available to service that local infrastructure. • LTPs and infrastructure strategies have to adequately provide for bulk infrastructure over a very long planning cycle of at least 30 years, where investment decisions are not reversible. Third parties would never be asked to fund these items, e.g. upgrading a downstream pump station or a wastewater treatment plant. • Therefore, the concept of infrastructure such as water supply and wastewater facilities being funded by third parties is already happening to the extent that this is practicable. We do not see any great potential for further developer funding, certainly not to the extent that it would influence estimates of feasible development capacity.
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National Policy Statement on Urban Development Discussion document

- Potential Spatial implications of proposed intensification Policy P6C Option 2

September 2019

In the discussion document on the proposed National Policy Statement on Urban Development, the following options for directing intensified development are considered:

Options for directing intensified development

The Government is considering two options for directing intensification through district plan policies for major urban centres.

Proposed objective/policy	Notes
<p>P6C Option 1: descriptive approach</p> <p>District plans must zone for <i>higher-density residential activities</i> within a suitable catchment area (ie, accessible by active transport modes) around frequent public transport stops and centres.</p> <p><i>Higher-density residential activities</i> are those with a concentrated bulk of buildings such as terraced housing and apartments.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Plan changes to be notified within 18 months of gazetting the NPS-UD • New policy
<p>P6C Option 2: prescriptive approach</p> <p>District plans must:</p> <p>a) zone for <i>high-density</i> residential activities within an 800m walkable catchment of centres and frequent public transport stops, except where evidence demonstrates intensification should not be enabled; and</p> <p>b) zone all residential and mixed use areas within 1.5 km of city centres for <i>high-density</i> development.</p> <p><i>High density</i> is where there is a minimum overall density of 60 residential units per hectare.</p>	<ul style="list-style-type: none"> • Applies to major urban centres • Plan changes to be notified within 18 months of gazetting the NPS-UD • New policy

Both options have two components: location and density, which are not mutually exclusive.

- **Option 1** (the descriptive approach) gives more scope for local authorities to decide on location, while still giving direction on this. However, it may not be as effective at shifting the focus to higher density in these areas.
- **Option 2** (the prescriptive approach) is clearer in identifying locations. However, 800 metres is a fairly crude measure for walkable catchments, and a density descriptor of 60 dwellings per hectare may not be workable in all locations.

The potential areas that are identified by Option 2 have been mapped (as shown in the following maps) to show the potential extent of this policy. In order to undertake this mapping the following assumptions have been made, in consultation with staff from the Ministry for the Environment:

- The 800m walkable catchment has been derived using Christchurch's GIS walking network model
- Frequent public transport stops are stops on bus routes with a frequency of at least a bus every 10 – 15 minutes during the day. In Christchurch the bus routes with that frequency are the Orbiter, Blue, Orange, Purple and Yellow Lines. These routes are shown on the maps 1-4. In addition to this, map 5 also includes four more routes that are proposed in the 2018 Canterbury Regional Public Transport Plan to become frequent routes in the future.
- 1.5 km from the City Centre has been measured from the edge of the Commercial Central City Business Zone
- In terms of the requirement to be within an 800m walkable catchment of centres and frequent public transport stops, only one of these criteria needs to be met to meet this requirement.
- In terms of the requirement to be within an 800m walkable catchment of centres, a number of different options of what could be defined as a "centre" under this policy, has been mapped. Maps 2 and 3 shows 800m from all commercial centres (including local centres), Map 4 shows 800m from the Central City, Key Activity Centres and Neighbourhood Centres only. Map 6 shows the network of commercial centres in Christchurch.
- The areas mapped are the maximum areas identified by Option 2, there has not yet been consideration of the extent that there is evidence that intensification should not be enabled in any of these areas.

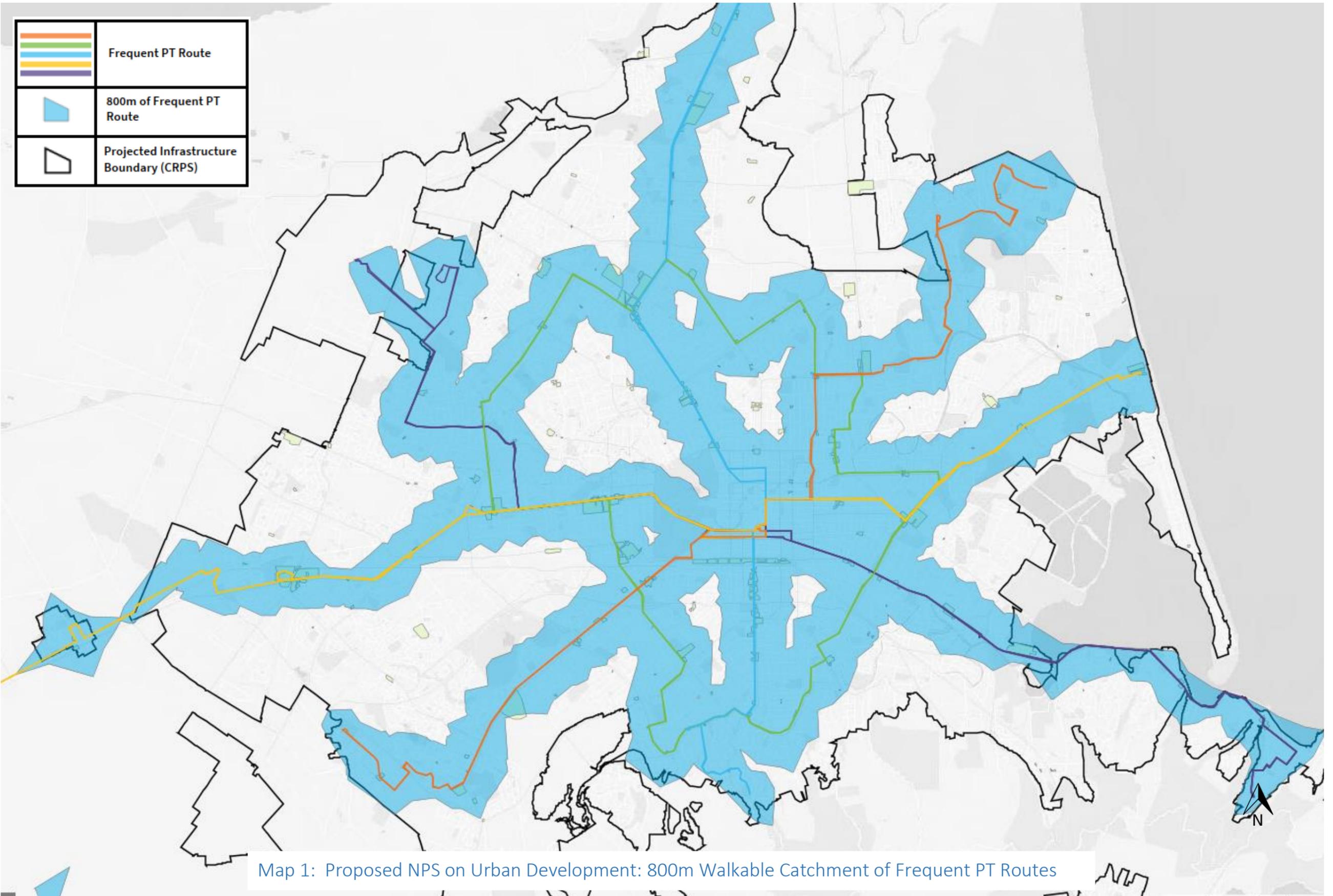
Potential Coverage of these areas

10% of Christchurch's 'urban area' is already enabled for medium density within a walkable catchment of the central city and key activity centres within our Residential Medium Density, Residential Central City and some commercial and Residential New Neighbourhood Zones. **Together this policy approach provides more than sufficient development capacity to meet projected long term needs.**

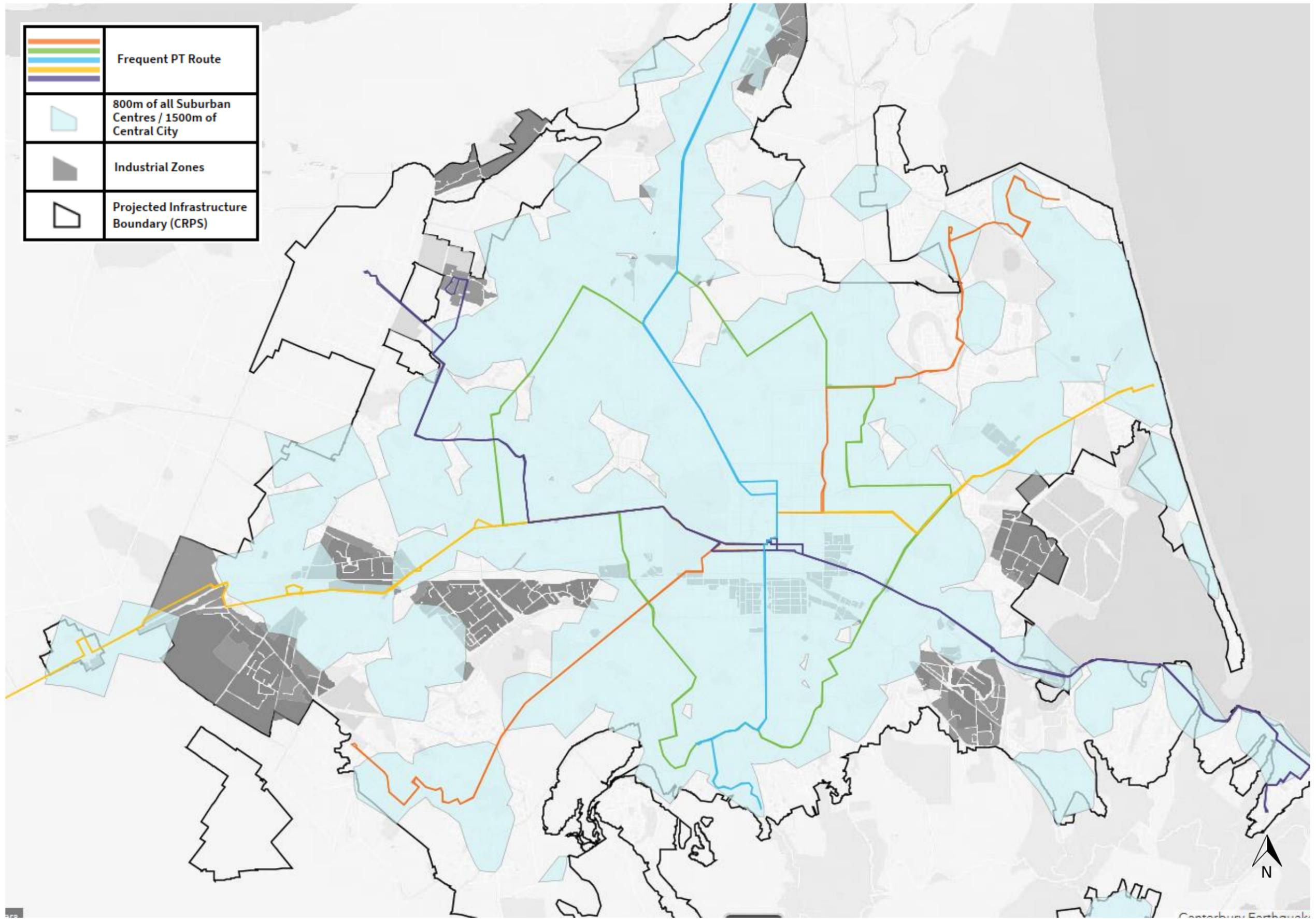
If the approach of increasing density around all centres (including local centres) as shown on Map 5 was adopted, this would increase to over 70% coverage i.e. seven times the current provision enabled in Christchurch. Such provision is neither necessary nor desirable and such dispersed growth may run counter to our other objectives of facilitating recovery of the central city and key activity centres. Further, the function of local centres is to serve a very localised walkable catchment and these centres are not intended nor appropriate as growth modes.

If the approach of increasing density just around our larger centres and the current frequent PT corridors (shown on Map 4) is adopted, this still covers over 50% of the urban area and would result in a considerable oversupply and with similar consequential effects.

NOT COUNCIL POLICY



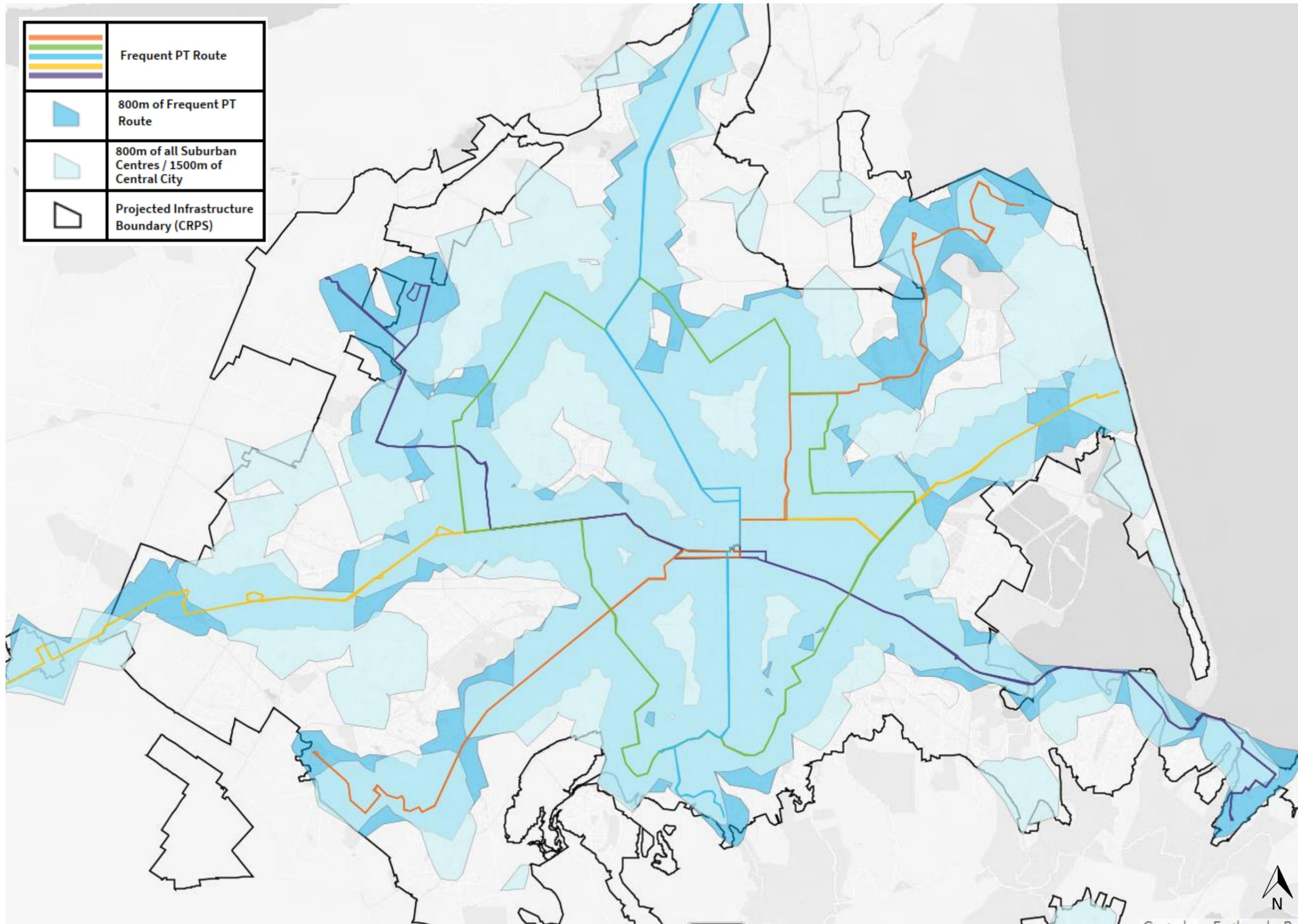
Proportion of Urban Area identified for high density under this scenario: 48% (Proportion of residential zoned land: 59%)



Map 2: Proposed NPS on Urban Development: 800m Walkable Catchment of all Commercial Centres (and 1.5 km Walkable Catchment of Central City)

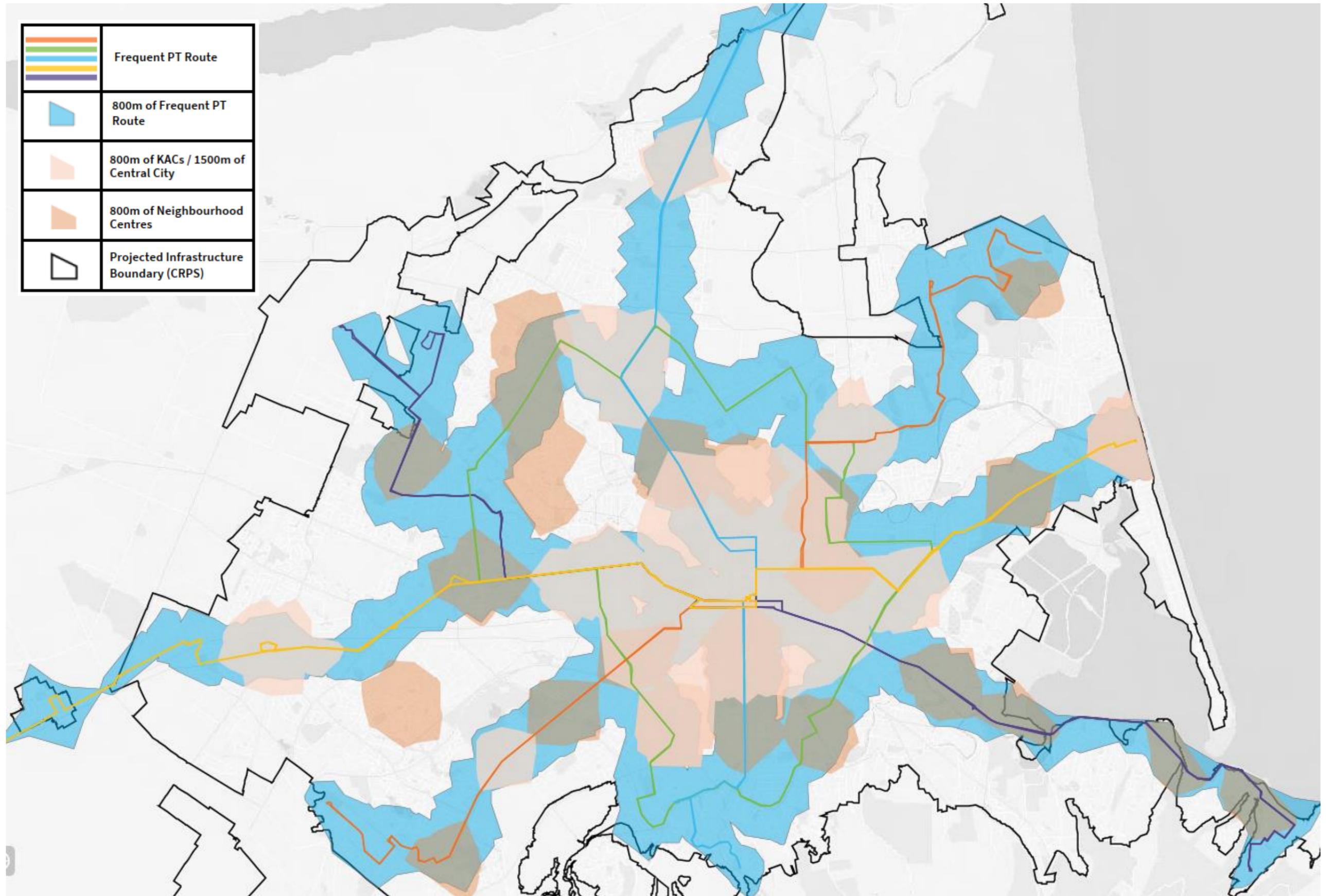
Proportion of Urban Area identified for high density under this scenario: 60% (Proportion of residential zoned land: 75%)

NOT COUNCIL POLICY



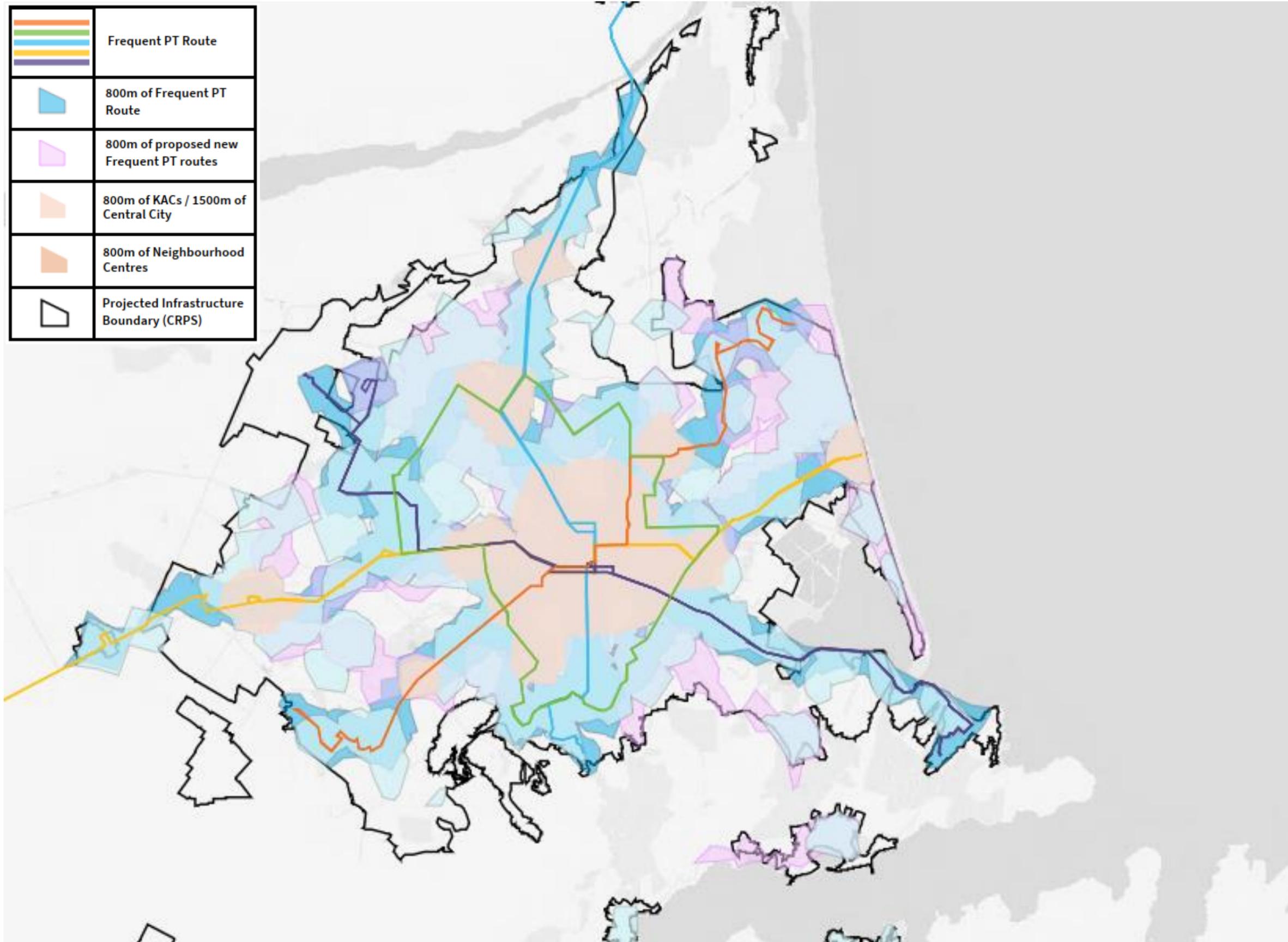
Map 3: Proposed NPS on Urban Development: Walkable Catchment of Frequent PT Routes and All Commercial Centres

Proportion of Urban Area identified for high density under this scenario: 68% (Proportion of residential zoned land: 84%)



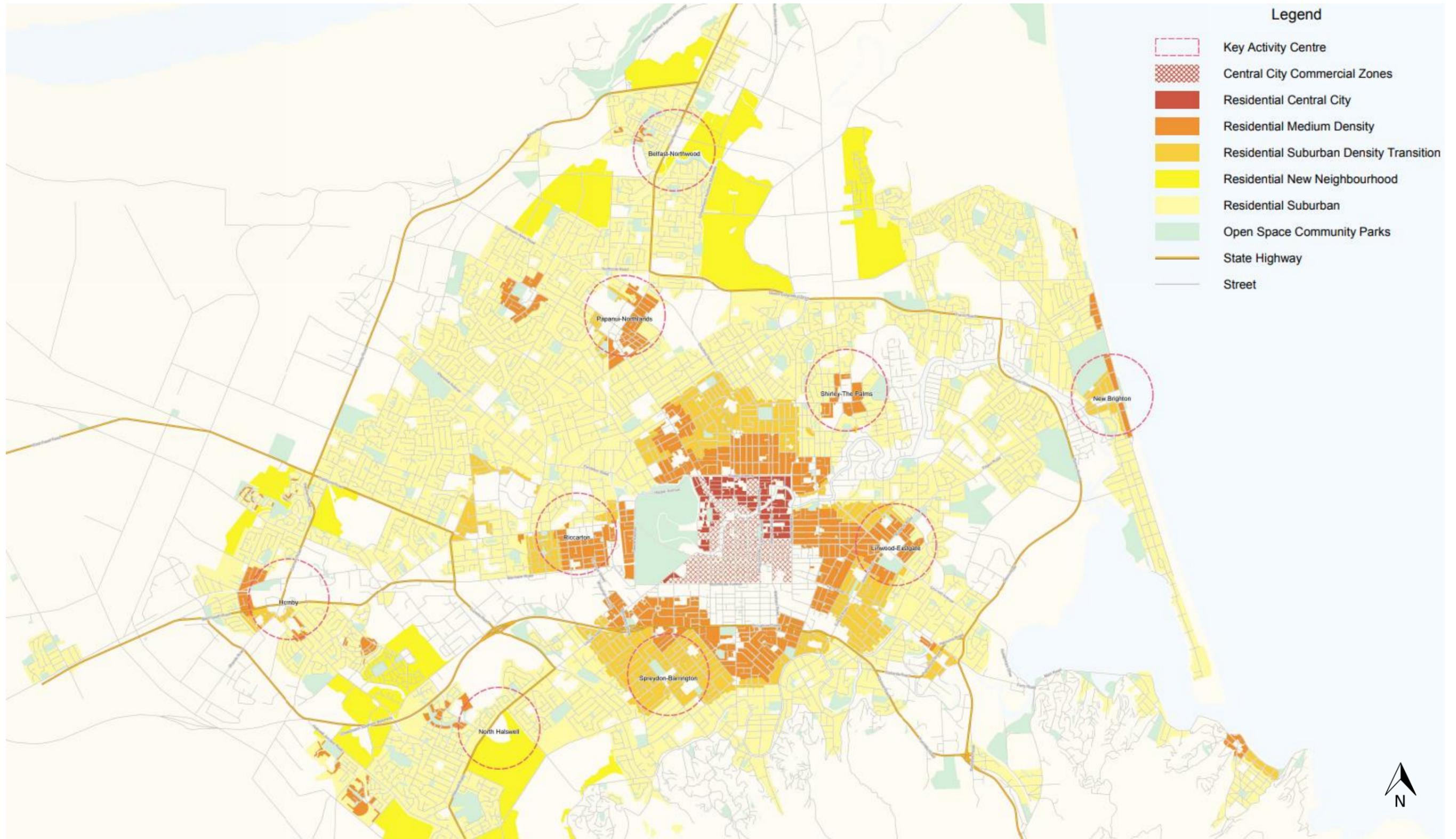
Map 4: Proposed NPS on Urban Development: Walkable Catchment of Frequent PT Routes and Central City, Key Activity Centres and Neighbourhood Centres

Proportion of Urban Area identified for high density under this scenario: 54% (Proportion of residential zoned land: 67%)



Map 5: Proposed NPS on Urban Development: Walkable Catchment of Frequent PT Routes (plus the 4 proposed new frequent routes) and All Commercial Centres

Proportion of Urban Area identified for high density under this scenario: 73% (Proportion of residential zoned land: 90%)

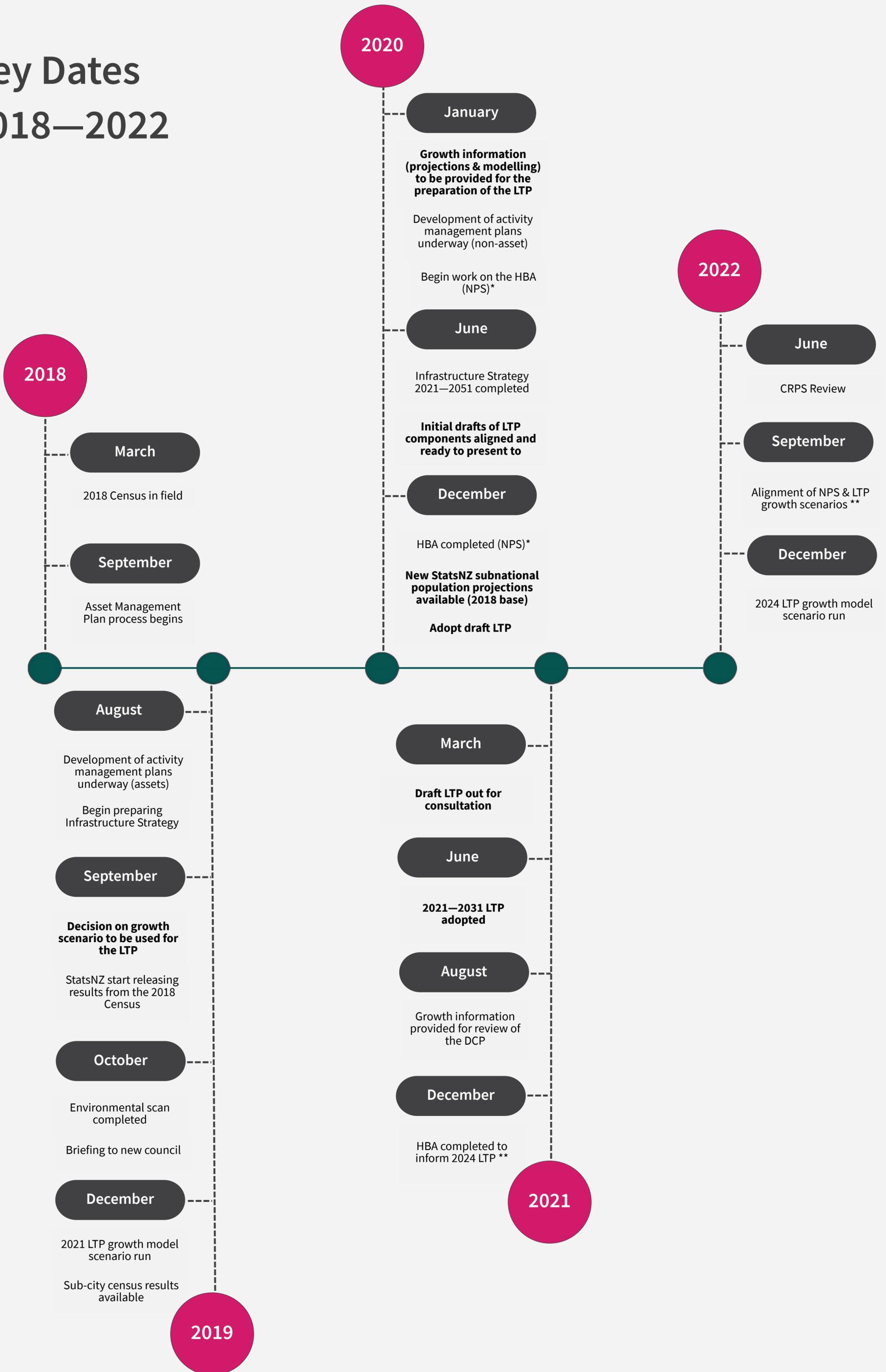


Map 7: Christchurch District Plan: Medium Density Residential Zones focused around Central City and Key Activity Centres*

*darker colour denotes higher densities

Key Dates

2018—2022



* Based on requirements in current NPS-UDC

** Based on requirements in proposed NPS-UD (use capacity assessment to inform LTP)