



Greater Christchurch Partnership Submission

October 2019



Greater Christchurch Partnership

Te Tira Tū Tahī
One Group, Standing Together



Submission

Submission on the Proposed National Policy Statement on Urban Development:

National Policy Statement on Urban Development Consultation
Ministry for the Environment
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Submission:

This is the Greater Christchurch Partnership's submission on the proposed National Policy Statement on Urban Development (NPS-UD) as outlined in the Planning for successful cities discussion document (August 2019).

The Partnership fosters and facilitates a collaborative approach between the Partners to address strategic challenges and opportunities for Greater Christchurch through an agreed strategic framework to manage growth and address urban development, regeneration, resilience and long-term economic, social, cultural and environmental wellbeing.

This submission is made under delegated authority. The Partnership has not had the opportunity to endorse this submission at a formal committee meeting. The content of the submission follows overleaf.

Submissions from individual partner organisations are also being made and may cover more specific issues relating to their jurisdiction and statutory responsibilities.

Signed:



Bill Wasley
Independent Chair

October 2019

Overview

The Greater Christchurch Partnership (GCP) welcomes the Government's drive to foster successful cities that can underpin New Zealand's overall economic, social, cultural and environmental performance. We agree that cities will play an increasingly important role in transitioning to a more sustainable, productive, resilient and inclusive economy. Well-functioning and well-designed cities contribute to the wellbeing of their residents, enable businesses to thrive and support successful regions.

The Urban Growth Agenda (UGA) is an ambitious but critical move by Government to play its role in achieving these outcomes. Cities are complex systems influenced by a multitude of factors including markets (local, national, International), regulations, perceptions and their unique strengths and weaknesses borne out of their location, culture, history and natural environment. Success will come only by considering these factors holistically and in the context of each city and its surrounding towns, then using the range of tools available to local and central Government in the most appropriate manner and in partnership with other stakeholders.

In this context, the Partnership agrees that urban development is a matter of national significance and a national policy statement outlining objectives and policies that provide direction to local government and urban planning decisions is warranted.

However, the GCP believes that a NPS is just one tool available to achieve Government objectives. The proposed objectives and policies targeted at the identified major urban centres (MUCs) in the discussion document represent a one-size-fits-all approach that will not achieve the best outcomes for our cities. We summarise the reasons for these concerns and provide further explanation in the rest of this submission.

This submission provides high-level comment on the key proposals in the discussion document. It should be read in conjunction with the detailed submissions from individual partners to the Greater Christchurch Partnership.

Summary submission points

The Partnership supports:

broadening the development capacity focus of the current NPS-UDC to include other matters that contribute to well-functioning and well-designed urban environments

The NPS-UDC focus on development capacity does not sufficiently recognise that successful cities do not just make room for growth but champion sustainable, high-quality development that incorporates measures necessary to remain competitive, attractive and respond to change (demographic, technological, societal) for the wellbeing of current and future generations.

targeting some policies only to MUCs, specifically the requirements to prepare: a future development strategy (FDS) to guide long-term planning (noting this need not be a separate document but can be part of a spatial planning framework)

a Housing and Business Development Capacity Assessment (HBA) to provide a robust evidence base for decision-making

Targeting some policies to the six identified MUCs - home to around two-thirds of the country's population and generating a similar percentage of New Zealand's GDP – ensures any greater level of direction is proportionate to the influence these centres can have on the intended outcomes of the NPS and does not place unnecessary burdens on other local authorities.

strengthening the role of iwi and hapū

Identifying issues of concern to iwi and hapū, appropriate interaction with Mana Whakahono ā Rohe, and coordinated engagement practices with iwi and hapū will ensure opportunities for Māori to be involved in decisions that shape the urban environment are well-integrated across local authority responsibilities.

The Partnership has concerns with regard to:

a 'one-size-fits-all' approach for MUCs in relation to detailed proposed policies

The Partnership understands the intent behind these proposals but each of the six MUCs has different attributes and varying priorities not suited to the blanket approaches being promoted. Within each MUC there will also be quite different characteristics and urban environments. Greater Christchurch for example comprises Christchurch City, as well as the larger towns of Rolleston and Rangiora and more rural townships servicing surrounding rural areas. The GCP would strongly prefer that Government works collaboratively with councils through emerging urban growth partnerships in these areas so that policies to implement NPS objectives are appropriate to each local circumstance.

the scope and clarity of policy wording in proposed objectives and policies

For example, the term 'quality urban environments' is currently narrowly described in Objective O2, will likely vary according to the scale of the urban area and as a minimum should refer to good urban design. Enabling intensification appropriate to the scale and characteristics of an urban area is supported but requiring this 'around frequent public transport stops and centres' is too ambiguous.

The Partnership does not support:

the proposal to enable out of sequence or unplanned urban expansion

The Partnership opposes any mechanism to enable ad-hoc consideration of unplanned or out-of-sequence urban expansion and believes this undermines the integrity of the NPS-UD. Such an approach reduces the level of planning certainty provided by statutory plans and would impose significant time and resource costs on councils responding to proposals.

Further explanation

A range of tools are needed to achieve the Urban Growth Agenda

National Policy Statements are prepared under the Resource Management Act 1991 and so direct how plans are prepared and decisions made under this Act. Much of the broad intent behind the proposed NPS-UD has been engrained in regional and local planning documents in Greater Christchurch for some time now. Our experience has been the challenge of seeing these plans deliver high quality and affordable development at scale and pace when other barriers inhibit development being realised. These include fragmented land ownership, financing and funding hurdles, and the capacity and capability of the private sector, particularly for comprehensive redevelopment around key activity centres and along transit corridors.

The Partnership is concerned that blanket policies in the proposed NPS-UD will undermine public attitudes to intensification. A more tailored approach to enabling intensification in the most appropriate areas, potentially using powers to be conveyed through the new Kāinga Ora urban development agency, is an example of a less confrontational route to transforming our cities.

A one-size-fits-all approach is not appropriate

The Partnership believes that the proposed NPS-UD should not contain such directive policies that appear to treat all cities and urban areas as being alike. Housing capacity and affordability pressures across the six MUCs vary considerably. The Partnership is also keenly aware of the need to continue to foster recovery and regeneration in and around the Central City of Christchurch. Greater Christchurch is distinct from Wellington which differs from the Auckland context. Each MUC will therefore have different priorities and warrant different planning responses.

Greater Christchurch itself contains urban areas which vary enormously, from the Central City environment, to suburban neighbourhoods, and surrounding towns (with populations of less than 1000 to over 20,000) despite them all potentially having what could be considered a frequent public transport stop. Trying to impose, for example, common housing densities and car parking requirements for such dissimilar urban areas is unjustified and inappropriate, especially for the proposed NPS-UD.

The Ministry for Housing and Urban Development is investing significant effort in working with the councils in the six metropolitan areas through emerging Urban Growth Partnerships. These partnerships will be far more effective in collaboratively reviewing the spatial planning needs of each MUC and identifying together the appropriate solutions in each case. This approach would also better align with the LGNZ drive for localism, enabling local solutions through partnership and collaboration around place.

Future Development Strategies

Many of the MUCs identified in the proposed NPS-UD have for some time now undertaken growth management strategies to ensure they are well-positioned to accommodate future housing and business needs and adapt to urban change.

The Greater Christchurch Urban Development Strategy (UDS) was launched in 2007 and looked out to 2041, resulting from a collaborative strategic planning exercise involving extensive community engagement. It was informed by a strong evidence base and provided the basis for land use recovery planning following the earthquakes of 2010 and 2011, in particular the Land Use Recovery Plan. The vision and principles underpinning the strategy were reaffirmed in an update to the UDS prepared in 2016 and more recently, in June 2019, the UDS planning horizon was extended to 2048 through adoption of Our Space, the future development strategy for Greater Christchurch.

The Partnership see the proposed NPS-UD requirement to prepare a future development strategy as being a concept consistent with and reflecting the good planning practice already occurring in Greater Christchurch. It welcomes the broadened purpose of an FDS compared to the narrower remit under the NPS-UDC but also looks forward to integrated spatial planning being more fully incorporated across statutes through the Government's stated intention to deliver a programme of legislative reform.

The Partnership also believes the preparation and three yearly review of an FDS is the most appropriate time to consider the need for and location of any additional greenfield expansion or altered development staging. This could be achieved through a 'call for sites' process, akin to that used in the UK, so that a holistic understanding of landowner and developer intentions is known and decision-making is informed by the robust evidence derived from capacity assessments. The costs and ad-hoc nature of the proposal to enable unplanned or out-of-sequence urban expansion outweigh any benefits it could offer.

It is noted that the proposed NPS-UD does not contain specific deadlines for completion of a FDS, instead linking the updating of an FDS to ensure it informs the LTP and infrastructure strategy processes. This is supported, but having just completed its first FDS and with councils having already commenced LTP2021 processes, the Partnership sees this only being realistically achievable ahead of the LTP2024 cycle.

To prepare our FDS, and the robust HBA which informed its preparation, was a costly exercise. Further costs arise through subsequent changes to RMA documents, and this cycle is repeated every three years. LGNZ and SOLGM publications have highlighted this as a common concern of local government. In part, these costs have been heightened by the technical specifications of HBAs (which are proposed to be carried forward and added to within the NPS-UD) and the delayed release of associated guidance. The Partnership implores Government to consider how policies, guidance and support enable a more efficient implementation of the NPS-UD.

END