



November 30 2018

RE: Greater Christchurch Partnership "Our Space"

SUBMISSION FROM SPOKES CANTERBURY

Spokes Canterbury is a local cycling advocacy group with approximately 1,200 members that is affiliated with the national Cycling Action Network (CAN). All submissions are developed online and include member's input. Spokes is dedicated to including cycling as an everyday form of transport in the greater Christchurch area.

We would like the opportunity to appear at any public hearing that is held to consider submissions on these projects. Should there be an officer's report or similar document(s) we would appreciate a copy(s).

If you require further information or there are matters requiring clarification, please contact our Submissions Convenor Dirk De Lu in the first instance. His contact details are:

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Don Babe

Chairperson, Spokes Canterbury

Our Space, Authority, Credibility and how to Strengthen both

Just how much weight will this plan carry? It is presented to respond to the National Policy Statement requirement to prepare plans to meet growth needs. Just what breadth that supports and binding commitments it entails is not clear.

Making the plan a helpful reference document increases its value to those who implement plans, elected officials and the general public. Having it make clear the gaps which will undermine implementation of Our Space can increase successful outcomes.

Our Space cites a number of local, regional and central government plans and policies both as its authority and how it will be implemented. Many of the prescriptions in Our Space are not found in in those plans. Within some of the plans some vital elements from Our Space are mentioned as possible future actions, or not mentioned at all. Vital roles such as 10 minute neighbourhoods and complete cycle networks, to name a few, are not developed, implementation scheduled too late to properly support Our Space and/or not funded.

To increase the likelihood for implementation of all of Our Space's facets put in links to the plans which offer mechanisms to make Our Space succeed. Include the document and page number(s) which support the Public Transport routes shown, or the airport noise zone restrictions, the urban boundaries; water shed protections areas, etc.

Where the plan offers a suggestion not directly committed to by other documents, such as the 10 Minute Neighbourhoods or complete cycle networks, make that clear and call for support. This can help the elected decision makers to prioritise policy making and funding to implement the plan's contributions.

There are a great many plans coming from various government entities. The public spends considerable time attempting to participate through the consultative process. Too often plans mention actions which the public interprets as commitments only to be disappointed. The usefulness of planning and the credibility of government is thus undermined. People are discouraged from participating and democracy is not well served.

Redrafting Our Space to make clear what has the legislative and policy backing to be implemented and what still needs to be done to assure implementation of all the 'promises' made can motivate citizen democracy. It may also improve the accuracy of media reporting.

As presented the public is likely to feel cheated should the many good aspects of the plan remain unrealized.

Our Space, the Good and what's needed

Building higher density housing and commercial outlets on public transport routes makes sense. Providing people with "10 minute neighbourhoods" where most of what we need is within a short walk or cycle makes sense. There are some good ideas here. Please, expand and apply them better.

The "10 Minute Neighbourhood" is a great bit. Make sure these neighbourhoods are close together and well connected by cycle networks. Rather than thinking of motorized transport people will discover the convenience of cycling to school, work, shopping. Once fit from short trips they will be able to venture out to adjoining areas and beyond. Make it easy to cross town by bicycle, the 20-40 minute community. Using a car will become a second or even third choice.

The plan needs to mandate cycle networks both within and between neighbourhoods and towns. Well connected off road and quiet streets options can attract the 'interested but concerned' cyclists flocking to Christchurch's Major Cycle Routes.

Thank you for stating that affordable housing requires houses at \$350,000 or less and rents at \$200 per week or less. These levels are already exceeded. Streamlining of regulations will offer some relief, but it is delusional to think it will bring costs down to these levels. Opening up new land on the fringes may offer some relief, but watch the prices rise when those developments are served by convenient PT. Current efforts by government and non-profit entities have been unable to meet needs and there is nothing in this plan which will significantly improve their efforts.

Thank you for recognizing that we can't rely on single occupancy vehicles, sovs, to meet our transport needs. Note that electric cars, autonomous cars, Uber and the like are likely to be primarily sovs. They don't have to be, but current vehicle use does not have to be and primarily is. Inertia and habit are powerful forces to overcome. The plan is weak on how they will be.

The land use proposed in the plan will continue the habit of car use as more people will be living far from employment and from friends and family. People could take the bus, but without far greater measures to build behaviour change into the plan a great many people won't. Drop greenfield developments which will only increase sovs. Make sure higher density urban development offers features such as the 10 minute neighbourhood and affordability to attract residents.

The plan mentions adapting to technological changes. Working from home is already a reality. With autonomous cars a person can work while sitting in traffic without the distraction of other riders and stops. Buses will remain 'loser cruisers', sovs the preferred mode.

Thank you for seeking to move people on to Public Transport, PT. PT is good for longer trips and for those unable to use active modes. It is also expensive, carries a large carbon footprint even when using more sustainable fuels like electricity and as proposed supports urban sprawl.

PT can be integrated with active modes or with sov's. It is misleading to use it as even a partial tick box item by characterizing it as an active mode. Especially when the plan calls for stops to be convenient to high density housing, employment and shopping.

(PT is a vital part of the transport network but it has a big price tag. Can we afford urban planning focused on sprawl with PT as 'the solution' or should we plan for affordable

density? <https://www.theguardian.com/us-news/2018/nov/20/new-york-city-subway-bus-death-spiral-mta-fares>)

The costs of PT will be borne by tax and ratepayers. They are the ones who should reap the increases from land values along the routes. Please explore 'value capture' and make this a requirement in the plan.

(Basics on Value Capture: <https://www.lincolninst.edu/key-issues/value-capture-property-tax>

Central Government looks towards capturing gains for the public:

<https://www.stuff.co.nz/business/102122026/finance-minister-grant-robertson-is-investigating-property-value-capture-tax-to-fund-rail>

Value Capture's role in funding infrastructure:

<https://www.simpsongrierson.com/articles/2018/could-value-capture-financing-solve-new-zealands-infrastructure-needs>)

Better yet don't open up greenfield development. Build housing where the jobs are. Provide the 10 minute neighbourhoods. With the population predictions, the cost of infrastructure and the need to preserve our ag land and resources putting high density development where the jobs are makes sense. Continuing to sprawl is simply not affordable or sustainable.

A real risk in this plan is that 'affordable housing' will be that which is not near PT or served by the cycle network. Many new developments apply restrictions or requirements on sections size, building type and use. How will this be balanced against affordability, the 10 minute neighbourhood and other requirements needed to make the plan work?

As proposed this plan implements the worst aspects of the Land Use Recovery Plan and will increase rates while enriching private individuals in the process. This is bad policy which will not deliver on its promises. Failing to correct the deficiencies is irresponsible governance.

Plans Fatal Flaws

Sea level rise is mentioned, but not actually dealt with. With climate scientists predicting anywhere from a meter to 3 meters rise by 2100 we need a plan which does not build on land which will be inundated. (*Billions at risk*

<https://www.newsroom.co.nz/2018/11/20/329590/125000-buildings-worth-38bn-at-risk-from-first-1m-sea-level-rise-draft-report>)

Insurance Cover Costly and not available for at risk properties

<https://www.stuff.co.nz/business/108931621/reserve-bank-voices-fears-climate-change-will-render-homes-uninsurable>

Otago Regional Council considers abandoning community

https://www.odt.co.nz/news/dunedin/abandoning-henley-voiced?utm_source=The+Bulletin&utm_campaign=ef5776a6eb-

EMAIL_CAMPAIGN_2018_03_01_COPY_01&utm_medium=email&utm_term=0_552336e15a-ef5776a6eb-533802933)

It is neither sustainable nor responsible to make long term plans without factoring in impacts which subject those plans to failure. As drafted this plan condemns the Greater Christchurch area to losing much of its infrastructure, housing, industrial and commercial investment within the next 50 years or less.

The plan's goal to provide housing must also factor in the housing to be lost to sea level rise and whole areas lost to occasional inundations.

Planning for a future which some people deny and most wish not to consider is challenging. Not to do so is a failure of governance both elected and institutional.

The plan calls for 55% new greenfield development. Much of this land is agricultural. We need to reduce food miles, increase local sustainability and agricultural export earnings. How will conflicts at the face between agricultural activities and urbanisation be addressed?

By planning for high density housing where the jobs are we can preserve more of our agricultural lands. We are fortunate to have the Port Hills, beaches and watershed reserves. Easy transport options serving those areas can increase the acceptability of high density and decrease sprawl.

Economic wellbeing predicated on growth has limits and our world is up against them. This plan emulates failed urban planning based on over consumption. It will not meet basic needs for the majority, enhance the environment or achieve local sustainability.

(Limits to Growth 30 year Update <http://donellameadows.org/archives/a-synopsis-limits-to-growth-the-30-year-update/>)

The draft plan must be wholly redrafted and consultation reopened.

A Few Resources to Guide the drafting of a New Plan

Some of these suggestions offer practical inspiration for achieving a plan which can meet our needs while greatly improving quality of life. Others offer changes based on this plan.

Resources for Making an Exemplary Plan

A few suggestions from the engineering community
<https://www.newsroom.co.nz/2018/11/22/332986/engineers-name-10-climate-priorities>

And this on the cycle friendly suburb can help develop 10 minute neighbourhoods
<https://www.theguardian.com/cities/2018/may/16/welcome-cycle-heaven-moved-family-netherlands-houten-utrecht>

Suggestions for minor improvements

Making revitalization of urban areas affordable

https://www.strongtowns.org/journal/2018/10/22/can-you-have-revitalization-without-gentrification-derek-avery-thinks-so?utm_source=pardot&utm_medium=email&utm_campaign=topmaturejab&utm_content=102218can-you-have-revitalization-without-gentrification-derek-avery-thinks-so

Another approach to PT https://medium.com/land-buildings-identity-and-values/greater-christchurchs-future-the-fat-banana-aba0402f16a4?fbclid=IwAR3bwcguU9sAfaALH9Q_CZKGdHnqUsMx1wIegTd5266eFCCIXeF2Ua4IaVo

On Rail and no urban development on ag land https://thespinoff.co.nz/society/24-11-2018/a-new-plan-for-christchurch-rail/?fbclid=IwAR02pJfH_q_EnCLSJmFb6Dkp0uP1Za1bpikBhnmzczKug4tBZWxTqMA7SY

A novel approach to urban design https://www.youtube.com/watch?v=9cudn_vSdCY

On Consultations and Submissions

In too many instances comments made in submissions are ruled as 'out of scope' or not supported by legislation. In doing so plans and projects have gone ahead to implement and institutionalize their shortcomings, fatal flaws and negative impacts on the policies they allegedly implement. Thus failing the community's they are meant to serve and wasting millions. The benefits consultation could provide are defeated.

This draft plan seeks to guide development in the Greater Christchurch area for decades to come. With a writ so large to fail to apply the insights and suggestions from consultation is at best a dangerous nonsense. Doing so may make planning easier, please some interest groups allow simplistic tick box evaluation and facilitate the public relations task of selling the plan but, the eventual and inevitable failures place an unendurable burden on current and future generations. We cannot afford more 'Business as Usual approaches with a few tweaks' to pass for responsible planning and development.

Too often legislative support is lacking for the needs and concerns the public rightfully raises. This plan needs to point out those shortcomings. Responsible local bodies will seek ways to achieve just and responsive outcomes. They will represent their constituent's needs to central government to achieve the necessary legislative support. All problems are identified, the public informed and empowered and robust comprehensive plans adopted.