

## Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill

### Select Committee Hearing – 18 November 2021, 12:40pm, via Zoom

Thanks for the opportunity to submit on this Bill. We welcome the bipartisan approach but would have preferred that it had included engagement with affected councils, not to mention our residents.

They feel like they are being left out of the conversation. And they are not Nimbys either – they are concerned about their city being a liveable city. They feel as if they are going to be completely side-lined in the Intensification Streamlined Planning Process.

We have referenced in our submission the Government Policy Statement on Housing and Urban Development, which says that ‘places should be accessible, connected, well designed and resilient’.

We agree. The urban design standards that have been developed by Kāinga Ora should be embedded as part of this approach.

The Explanatory Note for the Bill states that its intention is to rapidly accelerate the supply of housing where the demand for housing is high.

It is designed to help to address some of the issues with housing choice and affordability that Aotearoa New Zealand currently faces in its largest cities.

This Bill requires territorial authorities in our major cities to set more permissive land use regulations that will enable greater intensification in urban areas by bringing forward and strengthening the National Policy Statement on Urban Development (the NPS-UD) which is designed to address restrictive land use regulations.

We want what you want.

But we want you to know that in Otago Christchurch we have already come a long way in addressing restrictive land use regulations.

We started planning with our two neighbouring districts, our regional council and Waka Kotahi back in the mid-2000s and we produced an Urban Development Strategy, which focused on the inner-city density we wanted to see and curtail urban sprawl. This meant after the earthquakes, the government had a mechanism to fast-track changes to our District Plans and enable developments to replace what had been lost.

The replacement district plan which followed, reduced consenting and notification requirements, removed amenity protections and increased densities where it made sense. I don't know how many times I have said – come and talk to us – we can tell you what works and what doesn't.

**Related submission points:** That robust design standards should be introduced. The urban design standards developed by Kāinga Ora could be used to modify the Medium Density Residential Standards in the Bill.

There isn't a Minister I've spoken to who has considered what our District Plan enables. The 2017 report quoted by the Minister introducing this Bill came out before our District Plan became operative.

The Greater Christchurch Partnership now includes Ngai Tahu and the CDHB. We get the wellbeing aspects of land-use planning as well.

Our central city has a minimum 50 households per hectare requirement – we have height limits that are sympathetic to the post-earthquake environment and our ground conditions.

We actively encourage intensification in the inner city and within walking and cycling distances of core services and transport corridors. Our residential medium density zones are a minimum of 30 households per hectare.

We love 15-minute neighbourhoods, and were already committed to increased residential growth through intensification, rather than urban sprawl.

We can make the NPS-UD work if we are allowed to target increased development in areas where we know we can grow, rather than enabling ad-hoc, pepper-potted development in areas dictated by the market.

- This Bill could see the increased intensification of outer suburbs, where land is cheaper, drawing households further away from centre cities, local centres and transport routes. This is the opposite of what a city needs.
- It's important to remember that targeting is not the same as limiting development – we are already making enough development capacity available in targeted areas, without in any way constraining the market.
- At the same time, we need a minimum residential density in the urban parts of our neighbouring Districts – we have agreed that should be 15 households per hectare with higher densities within walking distance of the centres that would help support the case for MRT. We don't want to mimic Auckland – we want to get ahead of the curve.

Last week the Council received a significant number of deputations on the council's submission on the proposed law change. Residents were very concerned about the loss of greenspace and trees, and the consequent detriment to local amenity and the liveability of local neighbourhoods. With no minimum landscaping requirement, our residents are deeply concerned about the loss of greenspace and trees.

We agree.

In Christchurch, The Press has spearheaded a campaign for us to become a National park city, and at the same time our residents can see sections being clear-felled of the trees before the development goes in with 20% of the site being landscaped, but now even that concession will go. We have submitted that a minimum of 20 percent of a

**Related submission points :** That the spatial extent that the Medium Density Residential Standards applies to is targeted to the areas identified for medium density growth in the District Plan, rather than city-wide; and that the geographic scope of the Bill is clarified.

That a minimum density of 15 households per hectare is included in the MDRS.

site's area ought to be landscaped (planted), with a requirement for a specified percentage to be used for trees.

A recent survey has indicated that Christchurch City's canopy cover has declined between 2015-2018. Trees provide more than amenity value – they provide shade and support biodiversity - they're our city's lungs and are vital for reducing and/or offsetting emissions and combatting climate change.

**Related submission point:** That the Bill includes a building standard requiring at least a minimum of 20 percent of a site's area to be landscaped (planted), with a requirement for a specified percentage to be used for trees.

In closing, as I said before, the Council is supportive of the Government's aims to address housing shortages and enable the delivery of a wider range of housing options.

However, we like they are concerned that the legislation is going to have significant impacts on council's place-making, land-use and infrastructure planning work, as well as on our local communities and neighbourhoods.

We think a collaborative partnership between local and central government would produce better outcomes than a blunt, one-size-fits-all, legislative approach. But we have said this before.