



## **Submission on Proposed Change No. 1 to the Regional Policy Statement**

31 October 2007

**From**  
Sustainable Otago Christchurch Inc.  
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<b>Signed:</b>		

We do wish to be heard.  
Please email or phone advice on hearing to David Evans (SOC secretary)

Sustainable Otautahi Christchurch Inc. (SOC) is an incorporated society formed in April 2005. The aims of SOC as in its constitution are: *Recognising Te Tiriti O Waitangi / The Treaty of Waitangi, to actively contribute within Otautahi/Christchurch to opportunities and means for achievement of long-term sustainability. In doing so, to seek to ensure that all people have their basic needs satisfied, so that they can live in dignity, in healthy communities, while having the minimum adverse impact on natural systems, now and in the future.*

## **Comments on the Proposed Change No.1 of the Regional Policy Statement**

Overall, Sustainable Otautahi Christchurch (SOC) strongly supports the Proposed Change No. 1.

We are highly supportive of the principle inherent in the Proposed Change No. 1 that urban development should be driven by local government through integrated planning, rather than being driven by adhoc development. We consider the Change No.1 provides considerable improvement upon the ad-hoc urban development approach which has occurred under the existing RPS.

In our submission on the Greater Christchurch Urban Development Strategy (UDS) options in 2005, we applauded the collaborative process that created the current UDS. We strongly support the RPS Change No.1 as a way of continuing that collaborative process and providing the statutory framework to enable implementation of an urban development strategy.

In our UDS submission, we were, however, critical of what we consider an insufficiently strong sustainable development approach including insufficient analysis of the sustainability implications of even the Option A scale of green-field development. We disagreed with some of the criteria used and assumptions made in developing the UDS options presented. In particular, we believe that transitioning towards sustainable communities in a sustainable city, and the resulting improvement in quality of life, should be the key drivers to plan for future urban development, not population growth, economic growth or infrastructure development.

A strong sustainability approach includes maintaining valued quality of life for future generations; living within resource limits, including the application of the Precautionary Principle; and achieving economic viability within the context of a peaceful and just society, which itself exists within ecological constraints. SOC is strongly supporting the proposed Change No. 1 because it is much better than the permissive ad-hoc, completely unsustainable development currently allowed, but we are alarmed that the Change No.1 will still set into a statutory framework an urban development model for Greater Christchurch that we consider is simply not sustainable.

### **Specific comments on parts of Chapter 12A policies:**

Policy 2a:

SOC disagreed with the UDS plan to taking so long to reach the 60:40 intensification:greenfields development ratio, and we re-voice our disagreement here again.

We suggest including “*protection of existing community cohesion*” when identifying areas for intensification in 2e.

Policy 4:

We strongly support the principle in policy 4 of encouraging the existing towns listed to be self sufficient in terms of providing employment, living areas, commercial, community and recreational facilities to avoid them being “dormitory” towns.

Because policy 4, method 4.2 simply ends "encourage development to occur", it should be amended to appropriately describe the development that is required, i.e., it should read:

"Territorial authorities should give consideration to appropriate administrative and financial arrangements to enable and encourage development *consistent with the three principles of this policy to occur.*"

#### Policy 5:

SOC very much supports building upon the existing "key activity centres" listed to provide a range of services and facilities. We support the intention outlined in the policy 5 explanation of avoiding commercial development in other areas that can reduce the ability of the key centres to fulfil their functions. However, focus on the key activity centres must not be to the detriment of the viability of smaller community hubs, local neighbourhood centres that people can easily walk to from their homes. Furthermore, increasing future energy costs will make long-distance transport expensive and require more local food production so any arable land around key activity centres needs to be protected.

We suggest adding two bullet points to 5d to ensure that such expansion of key activity centres: "*does not reduce the viability of appropriate provision of commercial and community services in more local neighbourhood centres*"

*" avoids alienation of arable land suitable for intensive food production"*.

#### Policy 6

In its UDS submission, SOC was critical of the lack of strong sustainability analysis of the four options and remains highly critical of the slow pace being taken to change the intensification:greenfields development ratio.

#### Policy 7:

SOC strongly supports all details of Policy 7 as providing a means of applying sustainable design to urban planning. Indeed, especially given our criticism of the very long time it is planned to take to change the intensification:greenfields development ratio, the urban design principles outlined in policy 7 are absolutely crucial to designing new developments for greater sustainability (or 'less unsustainability' as it will more accurately be). Aligning with the principles of the NZ Urban Design Protocol seems like a useful, logical thing to do.

Canterbury is one of the most modified landscapes in New Zealand and restoration of its natural biodiversity is critically necessary. We suggest changing bullet point six to something like: "*provision for sufficient open spaces and parks to enable people to meet their recreation needs and to enable fostering of indigenous biodiversity including connectivity with other open spaces that support indigenous biodiversity, with higher levels of public open space for areas of higher residential densities,*"

We also suggest adding a bullet point re:

*"safe-guard the social cohesion of existing communities"*

The move towards renewable energy sources will lead to increased domestic use of solar energy, so a further bullet point should be added to policy 7, along the lines of:

*"provision of land parcels orientated to promote buildings with optimal interception of solar energy"*

#### Policy 8:

Canterbury is one of the most modified landscapes in New Zealand and restoration of its natural biodiversity is critically necessary. For this reason policy 8 (c) (vii) should be modified to read: "*land reserved or otherwise set aside from development for environmental, biodiversity or landscape protection and enhancement,*".

#### Policy 9:

Policy 9 is road-centric and increasing future energy costs will necessitate more efficient modes of transport than those supported by roads. For this reason another method should be added to policy 9, something like:

*"The Canterbury Regional Council and territorial authorities shall give consideration to the reservation of new transportation corridors to support modes of transport more efficient than roads, e.g. rail and cycle."*

Policy 13:

Using fertile arable land for residential development will be seen as outrageous when it becomes too expensive to ship food from overseas or from the North Island. For this reason another bullet point should be added to policy 13 method 13.1 (iv):

*"avoid removing arable land from production".*

Policy 15:

We support having the ability within the RPS through policy 15 to reconsider the extent, location and timing of land for development, particularly from our perspective to allow re-consideration should any of the UDS assumptions turn out to be inaccurate.

The UDS assumed that the cost of transport fuels will only steadily increase over the next 20-30 years, with no sudden escalation in price or supply shortage. We urge Environment Canterbury and its partner UDS territorial authorities to re-examine this key assumption in much greater detail without delay, identifying the implications to greater Christchurch under different scenarios of liquid fossil fuel supply peaks and prices, and revising Policy 6 accordingly.

SOC also believes that any reconsideration initiated by Environment Canterbury will need to not only involve territorial authority input, but should also explicitly include consultation with non-government organisations and other interested persons under Sections 82 and 83 of the Local Government Act. This needs to be linked to consultation with Maori under Section 82 (2) of the Local Government Act, and Sections 6(e) and (g), 7(a) and 8 of the Resource Management Act. SOC therefore requests that the first phrase of policy 15 be amended to:

*"The Canterbury Regional Council in conjunction with the territorial authorities and in light of consultation procedures under Sections 82 and 83 of the Local Government Act and consultation with Maori under Section 6e and (g), 7(a) and 8 of the Resource Management Act, will"....*

Policy 12A.7:

SOC requests that in addition to those matters listed for monitoring, a bullet point should be added in the monitoring to include: *"social consequences of intensification"* to ensure that, for example, at-risk communities have not been displaced by intensification changes. Also, that another bullet point be added to include: *"future trends that may affect the assumptions within the UDS"* to allow monitoring not just of what is or has happened and its impacts, but what scientific information is saying will likely happen in the future. That is, the RPS should be able to respond predictively from the current best available information. Scientific information and consensus on the likely impacts of such issues as human-induced climate change, ecosystem degradation, and liquid fossil fuel supplies is building rapidly. These trends should be monitored regularly to enable sufficient time to respond appropriately through urban planning.