NZPI Submission on the Christchurch Draft Central City Plan - September 2011
Introduction

The New Zealand Planning Institute (NZPI) extends its thanks to Christchurch City Council (CCC) and the residents of Christchurch for this opportunity to provide comment on Christchurch’s Draft Central City Plan (the Plan).

The comments below are offered in a spirit of general support for the Plan. In NZPI’s view the Plan demonstrates Council’s commitment to a collaborative approach to the rebuild of Christchurch. In particular, NZPI wishes to acknowledge the considerable effort that Council has made in engaging with the community and stakeholders, most notably the Canterbury Earthquake Recovery Authority (CERA), Te Rūnanga o Ngāi Tahu and Environment Canterbury (Ecan).

The result of that engagement is a well articulated planning framework which addresses the community’s immediate and future needs and supports a planned transition from devastation to a reinvigorated and safe Christchurch.

NZPI asks CCC to note that it wishes to take up the opportunity to speak to the following comments during the hearing process in conjunction with our sister institutes, in particular NZIA.

NZPI also wishes to affirm its ongoing commitment to Christchurch and to working with key stakeholders such as CCC, CERA, central government and other professional institutes to achieve the best possible outcomes for Christchurch communities.

About NZPI

Established in 1949, NZPI is the professional organisation representing planners, resource managers, urban designers, and environmental practitioners throughout New Zealand. NZPI membership is broad, and individuals within our organisation have a varied range of opinions and experiences which helped to inform this submission.

NZPI’s submission on the Plan draws on the experience of NZPI members together with input from the National Executive and senior Board members. In particular, the comments in this submission are informed by recommendations arising from a planning think tank session held on 13 April 2011.

The think tank session organised by the Canterbury/Westland NZPI Branch with support from the NZPI National Office, was attended by over 50 planners, predominantly from the greater Christchurch area. Together they identified, discussed, debated and offered thought and leadership on the key issues facing Christchurch post earthquake. The topics discussed ranged from urban form to the role of existing plans and strategies. The feedback from attendees on each of the topics was summarised in the Pathways to New Beginnings report, and was offered in support of the considerable efforts, resources and leadership intent on rebuilding Christchurch.
Objectives of the Central City Plan

NZPI generally supports the Plan's five objectives and the proposed implementation methods to achieve them:

1. Green City
2. Stronger built identity
3. Compact CBD
4. Live, work, play and learn
5. Accessible city

NZPI notes that there is significant overlap across the five objectives and that prioritising these appropriately will be critical to a successful outcome.

Five Guiding Principles

NZPI also generally supports the five guiding principles Christchurch City Council has used to develop the draft Central City Plan:

1. Foster business investment
2. Respect for the past
3. A long-term view of the future
4. Easy to get around
5. Vibrant central city living

Remembering / Maumaharata

NZPI supports the proposal in the Plan to retain and use heritage materials wherever possible, and believes that this will help tell the unique story of Christchurch in the years to come. Many important buildings were severely damaged or lost and this has served to make those buildings which remain of even greater economic and cultural value to the region and New Zealand. The management, treatment and protection of natural, cultural and built heritage post-earthquake will be critical to the future economic wellbeing and cultural identity of the region.

Key Projects within the Plan

NZPI's following comments focus on the ten key projects that the plan has identified as critical to fulfilling the plan’s vision and objectives.

NZPI is unreserved in supporting the following four projects:

- Avon River Park/Papawai Ōtakaro
- Compact CBD
- Christchurch Hospital
- Neighbourhood Parks
NZPI raises the following matters on the remaining six projects.

**Light Rail**

NZPI supports a greater mix of transport options, but queries the viability of the proposed light rail project. NZPI recognises that light rail can help shape land use and urban form decisions, while attracting more investment and stimulating the property development envisioned in the Plan.

However, NZPI is of the view that more detailed analysis is needed on the viability and economic, urban benefits of this project. In particular, a consideration of how the project would be aligned with proposed zoning and infrastructure changes along the proposed routes/stops is also needed. In NZPI’s view consideration should be given to building on an existing rail corridor that extends to Rolleston/Rangiora where significant residential growth is already occurring.

**Metro Sports Facility Centre/Convention Centre**

NZPI supports the concept of the metro-sports hub, including if necessary, a new stadium but considers greater assessment should be given to the location of the sports facility. Given the huge numbers of users that the centre is likely to attract a more central location, on the periphery of the core area (perhaps east of Manchester Street) should be investigated. Such a location would have significant benefits giving support to the regeneration of the CBD, located in close proximity to public transport hubs, including the proposed light rail, and strengthen opportunities for associated activities. Such a sports hub could also be linked to redevelopment of the convention centre to create a significant civic quarter.

**Cathedral Square**

NZPI queries the proposal to ‘green’ this key civic space and questions how it will operate as such if much of it is covered in grass. Given the proposal to include a network of neighbourhood parks and gardens within the central city as well as Avon River Park/Papawai Ōtakaro Victoria Square, NZPI considers the development of Cathedral Square for civic and commercial use would be optimal and serve to anchor this important space in the city.

Whatever that decision might be, a key issue for the square’s viable rejuvenation will be how the role of this landmark area is supported by adjoining land use and vice versa. We believe Council should consider financial incentives to generate that mutually supportive relationship between the square and adjoining land uses. For example, adjoining land users might be offered free use of a discrete area outside their buildings along with supporting activities and initiatives within the Square.

**Central Library**

In accord with the above comments, consideration should be given to locating the library on land adjoining Cathedral Square.
Transport Choice

NZPI is of the view that the earthquake poses an opportunity to create an integrated and robust transport system based on objectives guided by a vision and strategy for transport that reflects the community’s needs.

The central and wider transport system needs to be considered in context, as the system is intrinsically connected with each decision, affecting the outcome of the next.

To achieve this detailed modelling and analyses of road traffic, public transport parking demands and the wider city transportation network needs to be undertaken and released with the final Plan.

NZPI believes that the targets articulated within the Plan provide a good foundation for addressing some former weaknesses i.e. the city’s domination by private vehicle use with a lack of integration between land use and transport, and a lack of linked cycle and walk ways.

NZPI supports the proposed targets for the Transport Choice, as well as the proposals to:

- Improve amenity and with lower traffic speeds, allowing a wider Avon River/ Ōtakaro corridor to be developed.
- Provide separated cycle paths on key streets around the slow core to create a safe and efficient cycling network.
- Create a new sub network passing around the edge of the Compact CBD with high-quality buses and new style street stations.

One-way to two-way system

NZPI supports a review of the one way system, but believes that the decision to retain or change the current system needs to be considered within the wider street network. This will be a significant change and needs to be considered within the wider spatial transport context and following the full transport analyses.

Additional Comments

City Life

NZPI supports the Plan’s proposal to offer diverse living choices in new communities and celebrate the city’s rich cultural diversity with inviting public spaces and new facilities, attracting people to what will be one of the great little cities of the world.

NZPI also supports the overall philosophy for the CBD which will ensure that it is easy to navigate, compact and has a strong relationship with the river system.

In our view the road reserves and transport corridors could be efficiently used for cycling and pedestrians, with more entertainment and a cultural precinct in the CBD.
Equally the CBD could be better linked to Hagley Park with strong visual relationships to the Port Hills.

**Market City**

Attracting business back into the city centre will be critical for Christchurch’s economic wellbeing and ongoing redevelopment. NZPI supports the Market city concept.

**Incentives**

NZPI supports the proposal for incentives for commercial real estate developers and business tenants to focus the location of business activity and commercial development in the Central City’s compact core and health precinct.

NZPI asks that CCC consider extending the incentives package beyond the central city core zone. A tiered incentive system could be introduced for those developments in the fringe or mixed use zones given the significant extent of regulation introduced into these areas and the desire to see their pattern of land use change. In NZPI’s view such change in land use is very unlikely to be achieved by regulation alone.

**Comments on Statutory Changes**

NZPI’s principal concern regarding Volume 2 is that it introduces a suite of new regulations with relatively low trigger points for some resource consents and a high level of detail required to support applications. NZPI considers that the proposed changes may hinder the recovery of the central city through complex regulation and consenting costs. In particular we query the replacement of existing provisions (rules) where they appeared to be working well.

**Heights**

While NZPI believes there is merit in having a low rise and resilient city, limiting the maximum building height to 29 metres in the city core is considered to be too low. In many respects the market is unlikely to want tall buildings in the short-term, however the ability for significant developments should be retained. Retaining flexibility in the regulatory regime is essential to enable future opportunities.

**Urban Design**

NZPI questions the extent of provisions relating to design which add an unnecessary level of complexity. Such complexity and regulation is more likely to discourage rather than encourage development. NZPI considers one rule requiring design to be addressed is all that is necessary. Such a rule could refer to design guidelines which establish a framework for developers to address but with flexibility to enable innovative approaches to the basic parameters. The urban design elements can be assessed by the Councils Urban Design Panel, and the costs of such should be borne by the Council.
Retail

The maximum floor space rule of 450m$^2$ within the Central City is questionable. It will in NZPI’s view restrict numerous retail stores which might otherwise seek to locate within the CBD.

Transportation

NZPI considers that the amended transportation section introduces a level of complexity and associated costs which will deter development. NZPI suggests that while the CERA Act removes the need to undertake an RMA section 32 analysis, Council might consider a similar process (or regulatory impact statement) to determine the appropriateness of these controls.

Implementation

Implementing the Plan will take considerable resources and investment, and NZPI supports the three broad methods of implementation proposed in the Central City Plan;

1. rebuilding infrastructure,
2. public investment, and
3. supporting private investment.

NZPI notes that the geotechnical and interpretative reports being undertaken may necessitate changes to aspects of the Plan and therefore have impacts on the timing and approach for project implementation.

NZPI acknowledges the need for monitoring and evaluation of the Plan to achieve its overall objectives and deliver the outcomes sought.

Contact

NZPI wishes to be heard in relation to this submission and would prefer that this occurred in conjunction with other relevant professional institutes.

We look forward to hearing from you regarding the time and location. Should you have any queries regarding the submission content, please contact Christina Kaiser, Senior Policy Advisor by email: christina.kaiser@planning.org.nz, or telephone: (09) 520 6277 ext. 4.

Yours faithfully,

Susan Houston CEO