

UDF - Urban Design Forum Submission on A Liveable City - draft residential chapter

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By email info@cera.govt.nz



Introduction

The Urban Design Forum (UDF) is pleased to see that CERA and CCDU seek to encourage more residents to live within the Christchurch central area. The forum supports the sentiments in the first part of the document, but is alarmed to see the proposed means of achieving quality living environments. We do not believe that good urban design will result from the proposed changes to the District Plan provisions. For instance while it will be possible to build Traditional Central City Living as shown on page 10, it is far more likely something much less desirable will eventuate given the lack of design control in the proposed District Plan provisions, in particular the removal of the Urban Design Assessment.

The Urban Design Protocol developed by the Ministry for the Environment in 2005 recognises that urban design has economic, environmental, cultural and social dimensions. The Protocol now has 183 signatories including Central Government departments and Christchurch City Council. By endorsing the Protocol, signatories indicate their commitment to the pursuit of quality urban design. By removing the Urban Design Assessment the Government and Christchurch City Council (with apparently little say in the matter) will be reneging on this commitment.

There is very little rationale for the changes. Is there any evidence to demonstrate that the existing statutory framework is inhibiting development and that these changes will make a difference? Or could it be that other factors, such as lack of capacity in the development and construction sector, cost of land, and ease of building on greenfield sites, are the culprits?

Is there any evidence that the existing provisions are causing delays? Information released by the Christchurch City Council shows that across the 2013-14 year as a whole, 99% of resource consent applications were processed within statutory timeframes. This figure includes all of the resource consents which require restricted discretionary urban design consent in the Living 3 and Living 4 Zones and the Central City Business Zone.

There is no analysis of the implications of the changes. We would expect to see at least some testing of the rules to be made available in order to understand the parameters of development that would be permitted.

Urban Design Assessment

We are told that: "*The urban design standard is proposed to be removed in order to increase the attractiveness of the central city for residential development*". Does this mean only attractive for developers. What about attractive for residents as promised in the vision?

The need is to encourage good developers and raise the standard of the not so good ones. Experience in Auckland and Wellington, as well as other urban centres around the country has shown that a combination of the requirement for a design assessment, advice from an

urban design panel and published design guidance is working well to raise the bar on the quality of urban development. This qualitative approach is much more successful in achieving good urban design outcomes than relying on quantifiable standards. The proposed changes not only remove the requirement for a design assessment but are not accompanied by a corresponding increase in design rules.

It is difficult to understand why it is thought fit to leave urban design to the market in the residential areas in contrast to the Central City Business Zone where there are urban design controls, an Urban Design Panel process and the Joint Management Board. High density residential developments are complex and can benefit enormously from expert scrutiny.

Good urban design makes economic sense

A report entitled *The Value of Urban Design*, commissioned by the MfE in 2004, found that good urban design “does not necessarily cost more and delivers enhanced benefits to both the developer and the wider community”. While many developers appreciate the economic value of good urban design this is not necessarily the case particularly with smaller or novice developers or those operating at the lower end of the market.

The value of local character

Another relevant finding of the *Value of Urban Design* research was that urban design that supports local character can potentially add a premium to the value of housing, reinforce a sense of identity among residents and encourage them to help actively manage their neighbourhood and offer people meaningful choices between very distinctive places, whose differences they value.

With the removal of the Special Amenity Areas, the introduction of a blanket height limit of 14 metres and the removal of the Council’s ability to consider the context and appearance of a building, the capability of retaining and restoring the character of the various locales that make up the central city residential areas will be seriously eroded.

In some locations mass clearance has left nothing to work with and so the first development will set the scene for future development. If the first few developments do not achieve good outcomes then enticing developers into new neighbourhoods will be even harder, and will work against the overall objective of getting more housing, particularly in areas that have been less attractive in the past.

Safe neighbourhoods

The National Guidelines for Crime Prevention Through Environmental Design (CPTED) developed by the Ministry of Justice in 2005 explain that “CPTED is a crime prevention philosophy based on proper design and effective use of the built environment leading to a reduction in the incidence and fear of crime as well as an improvement in the quality of life”. The proposed changes to the District Plan remove the ability of the Christchurch City Council to vet applications for CPTED best practice.

Conclusion

The Urban Design Forum laments the extensive loss of the built fabric of Christchurch. While it supports the timely redevelopment of the central area it does not wish to see the heart of the city reinstated in an unsightly, characterless or unsafe manner due to a lack of appreciation of the need to support good urban design through appropriate legislation. We respectfully request that you:

- 1. Reinstate the Urban Design Assessment for the Central City Living Zone.**
- 2. Streamline the assessment matters .**
- 3. Give consideration to a Joint Management Board type process to ensure a quick turnaround and sound outcomes.**

Signature: 

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The Urban Design Forum NZ promotes good urban design in New Zealand.

The objectives of UDF are to:

- encourage the better urban design of our cities, towns and regions;
- provide a forum where ideas and comment about urban design can be expressed;
- bring before government authorities, public and other bodies any matters affecting urban design;
- co-operate and liaise with any individuals or groups including the NZPI, NZIA, NZILA, NZIS, IPENZ who have with an interest in urban design; and
- be involved in other activities which contribute to the above objectives.

UDF Participating Institutes are the New Zealand Planning Institute, New Zealand Institute of Architects, New Zealand Institute of Landscape Architects, New Zealand Institute of Surveyors and the Institute of Professional Engineers New Zealand.

UDF is modelled on similar groups in Australia and United Kingdom.

UDF's membership includes planners, architects, landscape architects, engineers, surveyors and other professionals, together with politicians, academics, developers and individuals.

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