



31 December 2006

Greater Christchurch Urban Development Strategy
c/o Christchurch City Council
PO Box 237
Christchurch

Urban Development Strategy Submission

1. Introduction

Spokes Canterbury, the local cycling advocacy group, is pleased to offer this submission regarding the draft Urban Development Strategy (UDS); our apologies for the slight delay. We would be happy to provide any further information or clarification if required, and request the opportunity of presenting our submission in person to the Urban Development Strategy (UDS) Forum.

As well as our direct membership, Spokes indirectly represent over 15,000 people within the Greater Christchurch area who typically use cycling for transport every day (to work, education, shopping, etc)¹, an estimated 100,000 residents who regularly cycle for recreation², and of course the many people who would like to cycle but feel forced not to because of the existing environment in Greater Christchurch. We are also heartened by the 96% of Christchurch residents who support the City Council in their efforts to develop Christchurch into a cycle friendly city²; this will not be fully realised unless a radical change in planning is taken. The UDS offers a great opportunity to help this process.

We have based our submission on the public consultation summary and detailed background report, and on the attendance of some of our members at various UDS meetings. A number of our members are also experienced practitioners in relevant areas such as transportation planning and sustainable development. We also strongly support the sentiments of the detailed submission provided by Sustainable Otautahi Christchurch (SOC).

Our submission is also strongly based on our previous submission to the original "Options" consultation document in 2005; this captured our general philosophy in great detail. We urge you to re-review this submission as well³, although we will try to encapsulate the key points here.

Our comments are largely focused on the transport implications of the UDS, although we appreciate that this is intricately interlinked with many other aspects such as land use, urban design, and environmental effects.

¹ Based on 2001 Census and NZ Travel Survey

² Based on CCC 2005 Residents Survey

³ A copy is available on our website www.spokes.org.nz, under "Submissions".

2. General Comments about the Draft Urban Development Strategy

While the UDS presents all the right “motherhood and apple pie” sentiments that we would expect to see in a purportedly sustainable strategy, it is lacking in a lot of detail to demonstrate exactly how it will be achieved. This may be a pragmatic way to get all of the respective parties to sign up now for it, but does seem to leave the door open later for them to argue over exactly what was meant by certain parts of the Strategy (e.g. “sustainable development”). Whilst we also appreciate that the tight timeframe of this major exercise does not help to produce a fully detailed plan from the start, it is important that the final Strategy is very quickly followed up with more detailed “implementation plans” (as opposed to the one-liner “action points” presented here) to deliberately direct key aspects of it. It certainly can’t be left up to “market forces” to achieve the aims of the UDS, let alone the current relatively non-interventionist local Government approach.

In reading through the draft Strategy, we are reminded of some comments made by Canadian Todd Litman (Victoria Transport Policy Institute) when he was visiting here in November. He noted that often people talk about “growth” (which simply means “bigger”) when they should be focusing on “development” (i.e. doing things “better”). Likewise there is often a focus on “mobility” (which typically just provides some people with a means to travel between places more easily) instead of the more encompassing term “accessibility” (by which all people are able to access necessary services & facilities, sometimes by not travelling at all). It would be nice if the UDS incorporated these sentiments too.

While the 20-page Summary booklet purports to be a summary of the full 200-page UDS document, we are concerned that it does not always accurately represent key details of the latter. For example the “Key Approaches” bear little resemblance to those in the full document, while the “Action Plans” that follow are not even listed, making it rather hard to comment on them. The structure of the consultation summary (in terms of sub-sections) doesn’t even reflect the structure of the larger document it purports to represent. It is also a concern that the submission questions that are asked are rather shallow; for most people who have not read the full document, it is difficult to answer these in the negative.

We are intrigued to see the predominance of sustainable transport presented in the images accompanying the consultation booklet; by our count 6 out of 10 images featuring transport present sustainable modes. This seems to be a recurring pattern for similar recent strategy documents (e.g. CCC Community Outcomes 2005, CCC Draft LTCCP 2006); however we’ve yet to see any remotely similar proportion of investment actually targeted at these sustainable modes. To some, this might be considered “false advertising”...

3. UDS Submission Form Questions

The following questions are extracted from the UDS Submission Form (with their corresponding numbers in brackets). Our comments are:

3.1 Will the Strategy make Greater Christchurch a better place to live in? (Q1)

Yes, with the inclusion of the suggested points we have raised here; however it will still require strong vision and political will to overcome the various objections that will be raised along the way by organisations and individuals. It is also important that any measures of what “a better place” means incorporate longer-term performance indicators, e.g. so that ongoing sustainability of resources is not sacrificed for short-term economic gain.

It is notable that, unlike the previous consultation phase, the current consultation material contains very little evidence of how the proposed Strategy actually performs in terms of various key measures (e.g. traffic growth, pollution, infrastructure costs). This makes it

difficult to say whether it will produce “a better place”. It is not even clear whether the proposed UDS is sustainable in the long-term. Given the Government’s recent statements in this area, we should at least be aiming to achieve this (e.g. meet Kyoto Protocol targets).

3.2 Do you think the proposed settlement pattern is the right one? (Q2)

No – we still don’t feel that enough emphasis has been placed on intensification and growth around existing urban areas, particularly those with rail access. The continued allowance for significant rural residential areas in Selwyn and Waimakariri districts for example cannot go unchallenged. It is quite clear that a large number of people who would live there would simply add to the daily flows into Christchurch each day, with the subsequent added pressures on our roading network. Such remote settlement will also require increased supporting infrastructure, such as water supply and waste treatment, which is hardly the most cost-effective way to encourage growth.

The proposed settlement pattern map is also not sufficiently clear on what will be the key urban communities where intensification and local services will be concentrated. This is vitally important to dictate the required development (by both private investors and Councils) to meet these desired settlement patterns. For example, recently Christchurch City Council has been reviewing its provision of amenities like libraries and swimming pools. Clearly it makes a lot of sense for such considerations to be tied into the UDS plans.

3.3 Does the Strategy go far enough to protect the character of urban areas, towns and rural areas? (Q3)

Not sure; this question seems a little oblique as it is precisely the existing “character” of many of these areas that is creating the existing unsustainable situation. It is quite clear that many areas will need to change their character to achieve the aims of the UDS, e.g. more use of higher-density living. Change however is not necessarily a bad, provided that suitable urban design standards are put in place. There are many overseas examples of more sustainable settlements that also provide outstanding attractiveness and amenity.

3.4 Does this Strategy provide enough choices for where people want to live? (Q4)

Yes; the problem is that it still provides too many choices. There still seems to be little regulatory control being put in place to ensure that proposed developments fit in with the overall Strategy in terms of location and its effects on infrastructure. This is reflected in the settlement pattern map, which shows large growth still proposed for areas of current interest to developers (e.g. southwest Christchurch), despite the inherent problems this would create.

3.5 Is enough attention given to providing transport choices, including public transport, car, cycling and walking to allow people to get around Greater Christchurch? (Q5)

No - The UDS continues to reflect its bias for private road transport by only showing as “Main Transport Corridors” the major arterial roads in the area. Neither the rail network, other possible public transport corridors, nor walking/cycling “green corridors” are indicated on your key map. This bias is also evident in the list of transport projects given on pp.170-173 of the full UDS document; most of this list is simply achieving the self-fulfilling prophecy of more private motor vehicles, with few specific PT initiatives and even fewer walking/cycling/TDM initiatives.

The true underlying hierarchy is also revealed for example by the list of transport options on p.158; it starts as usual with Roothing, followed by Public passenger transport, then Walking and cycling, and lastly Demand management. While this perceived priority may not be intentional, it would be nice if a public document finally acknowledged that the sensible way

to approach sustainable transport planning is to reverse this order, i.e. by asking these questions (in order):

1. "How can we reduce the need for travel?" (e.g. by mixed-use developments, telecommunications)
2. "Of the trips that do have to be made, how can we encourage as many as possible to be taken up by walking and cycling?" (e.g. by short-distance destinations, traffic calmed areas)
3. "Of the remaining trips, how can we encourage as many as possible to be taken using public transport?" (e.g. key destinations along PT corridors, bus priority)

Any private trips still remaining should be satisfied by the existing road network. Freight trips should have a similar series of questions analysed, in terms of the need for travel, distance travelled, and mode taken, with any remaining road-based trips catered for by the existing network.

We strongly support the suggestions provided to increase the use of walking and cycling, such as locating community facilities to minimise the need for longer-distance travel. However to achieve this successfully, there needs to be an extremely vigilant approach to every single proposed development in the district. It is no good, for example, if some cycle-friendly routes are developed in some areas whilst at the same time a new development springs up somewhere else that is harder to cycle to/from; the net effect may still be a worsening of overall cycle provision.

While we accept that buses rather than rail are the most pragmatic form of public transport in the short-term, we are disappointed that there appears to be little active planning to concentrate future growth around existing rail corridors, to help make it a viable option later. Although growth around suburban rail stations features as an action on p.92 of the full document, this policy is not clearly highlighted in the overall settlement patterns map, which is a key communication tool. Meanwhile a review of commuter rail options is only slated for the next UDS review point (p.116), whereas planning for it should be happening now. More concerted work to provide rail linkages into the central city also need to be investigated.

We strongly support the actions to expand the Bus Exchange and implement bus priority corridors as a matter of urgency. If we are to achieve rail-like service levels from buses, then we need to achieve priority corridors for them as much as possible. To expand the potential catchments for public transport, there also needs to be urgent work done to allow for carrying cycles on buses, thus making an even more viable alternative to private motor vehicles.

On p.164, we have some difficulty with the statement *"Currently 15% of all trips are to the CBD, emphasising the need to supply high quality cross suburban public transport services."* This seems to ignore the fact that CBD trips make up a larger proportion of the problematic peak periods. More importantly however, it suggests to us that we still need to work hard to provide more local services, thus minimising the need for longer distance cross-town trips.

3.6 Do you think there should be defined limits to contain the growth of the Christchurch urban area and the district towns? (Q6)

Yes; in fact we're disappointed that specific limits haven't been proposed yet (e.g. by recognising a "green belt" around each urban area).

A traditional "walking/cycling city" approach would suggest a central area of no more than about 5 km radius for reasonable travel by these modes (with more closely-spaced community centres for walking access). From central Christchurch, the only remaining pockets of undeveloped land that would qualify are in Hoon Hay – Hillmorton and Papanui – Marshland. Anywhere else would have to form part of separate outlying communities with full amenities available and good public transport links between them. In effect this already

dictates that places like Hornby, Halswell, Redcliffs/Sumner, New Brighton and Belfast (plus more remote places such as Rolleston, Lyttelton and Kaiapoi) should be developed as fully self-sustaining centres in terms of public amenities and land use mix.

To help enforce this approach, a “green belt” should be reintroduced approximately at the 5 km radius from the Christchurch CBD. In many places this is already available via existing open spaces (e.g. Port Hills, Bexley wetlands, Wigram aerodrome). Because of the development that has already occurred around Avonhead and Bishopdale, the boundary may have to be slightly further out here, also providing a buffer to the airport. These open spaces will also help to provide additional recreational corridors for active modes and can link to other “green-ways” further in (e.g. along rail corridors).

We are aware that some other commentators (e.g. developers) have stated that by putting area limits on urban growth, the cost of housing is driven up. This ignores the fact that any such increase is balanced by savings in other household costs (e.g. personal transport) and new infrastructure costs (currently largely borne by the community at large). People still have the same amount of money to spend; therefore, when weighing up where to live, it’s often the balance between housing costs and transport costs that simply changes. However a more constrained urban environment with good local community services and links also minimises other external costs such as pollution and resource depletion.

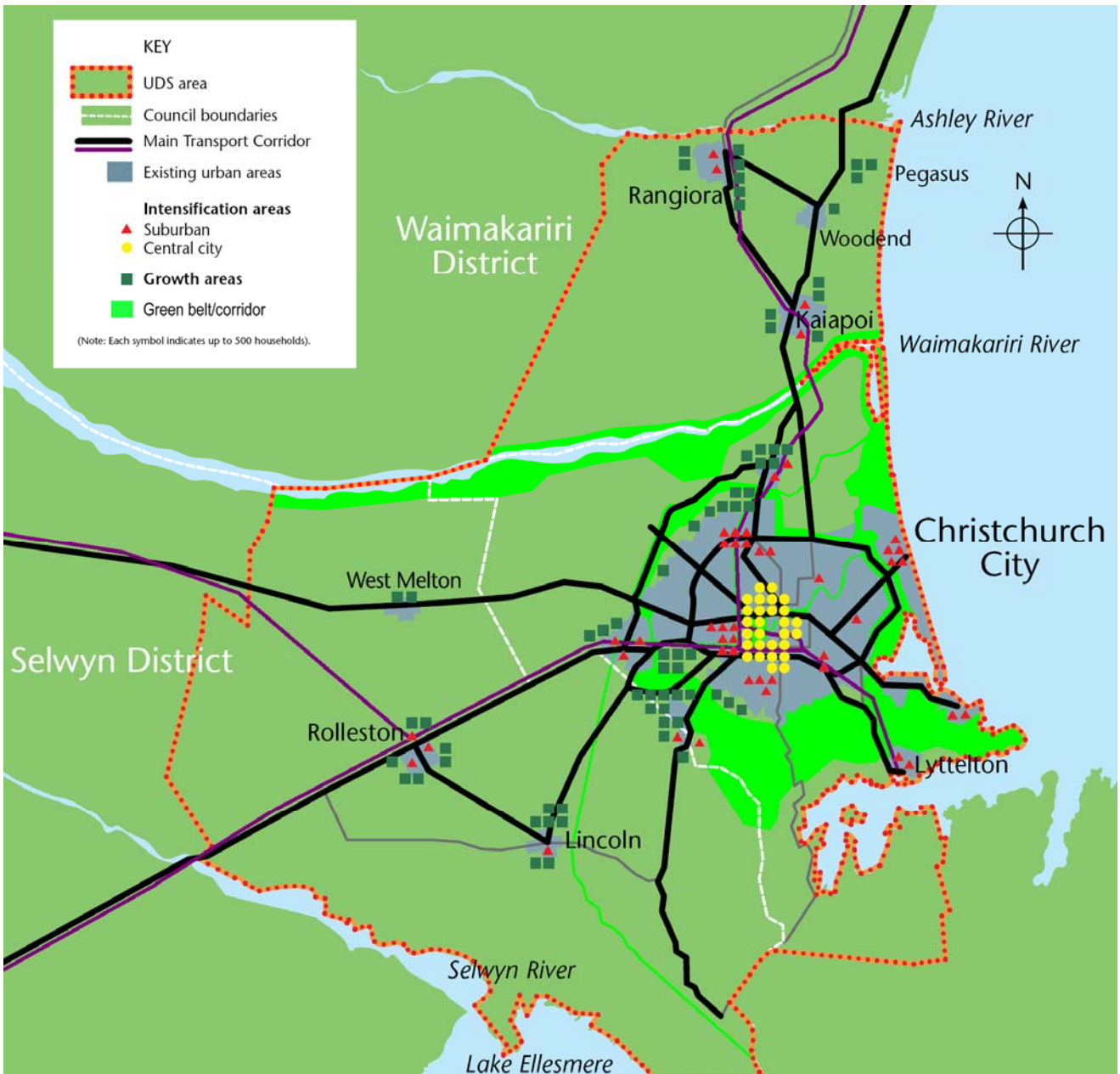
3.7 How important is it that the Councils and Transit NZ continue to work together to implement this Strategy? (Q7)

Very important – arguably the most important thing to come out of this Strategy will be the legal mechanisms necessary to enforce the aims of the UDS. For these to work properly, all of the key agencies must be in unison about what these instruments are trying to achieve. We are particularly concerned about how the rural districts of Selwyn and Waimakariri will view this Strategy, given that they currently benefit greatly from uncontrolled growth, generally to the detriment of Christchurch City. It will be critical that they accept the long-term benefits of some of the more radical changes required (e.g. less rural residential development, less focus on arterial roading networks).

In our previous submission on the draft UDS Options (June 2005), we presented a map, based on the consultation document map, to illustrate the points we were raising. We have repeated this exercise using the style of the current consultation settlement patterns map. The diagram below encapsulates many of the concepts that we believe are essential to a truly sustainable city (particularly in terms of transport). Key characteristics include:

- The formal creation of a green belt surrounding the core part of Christchurch
- Identification of key rail and green corridors
- Intensive redevelopment in central Christchurch and surrounding suburbs
- Strong redevelopment around key suburban and regional nodes, particularly those with rail access
- Very limited new (standalone) housing areas outside of the central Christchurch ring
- No new residential rural areas; with growth concentrating on existing settlements

The number of new households is still the same as indicated previously, but relocated in some cases (particularly to more intensified locations).



We trust that this submission has clearly expressed our views and we look forward to the next stages in this very interesting and important exercise.

Yours sincerely,

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Spokes Canterbury (the former Canterbury Cyclists' Association) is a local cycling advocacy group dedicated to including cycling as an everyday form of transport within local and regional planning. The group is affiliated with the national Cycling Advocates' Network (CAN) and includes a number of CAN's executive members.

Website: <http://www.spokes.org.nz/>