

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSIONS ON
MEMORIAL BUSINESS PARK PRIVATE PLAN CHANGE REQUEST UNDER CLAUSE 20 OF
THE CANTERBURY EARTHQUAKE (CHRISTCHURCH REPLACEMENT DISTRICT PLAN)
ORDER 2014**

To: Christchurch City Council ("**Council**")

Name: Scentre (New Zealand) Limited ("**Scentre**")

Scope of further submission

1. This is a further submission in support of the submission by the Chief Executive of the Canterbury Earthquake Recovery Authority for and on behalf of the Crown ("**Crown**") on Memorial Avenue Investments Limited's private plan change request under clause 20 of the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014 ("**Proposal**").
2. Scentre has an interest in the Proposal that is greater than the interest that the general public has because Scentre made extensive primary and further submissions on the Proposed Christchurch Replacement District Plan ("**Proposed Plan**") in its entirety. The submission made by the Crown on the Proposal raises several key matters that Scentre addressed in its submissions on the Proposed Plan, and therefore may have implications for Scentre's assets and activities.

Submission supported

3. Scentre supports the submission made by the Crown in its entirety.

Reasons for further submission

4. Scentre supports the Crown's submission and seeks that the Crown's submission should be allowed so as to:
 - (a) promote the purposes of the Canterbury Earthquake Recovery Act 2011, and give effect to the purposes and provisions of other relevant planning documents, including the Land Use Recovery Plan and the Canterbury Regional Policy Statement;
 - (b) promote sustainable management of resources, achieve the purpose of the Resource Management Act 1991 ("**RMA**") and give effect to Part 2 and other provisions of the RMA;
 - (c) enable the social, economic and cultural wellbeing of the Christchurch community;
 - (d) meet the reasonably foreseeable needs of future generations, including by sustaining the potential of the significant physical resource represented by ACL's assets in Christchurch for the future;
 - (e) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means, and discharge the Council's duty under section 32 of the RMA; and
 - (f) better reflect and give effect to the outcomes of Variation 86 and the relevant Environment Court decisions,¹ which emphasise a clear "centres based" approach and focus on the intensification of existing centres in respect of retail and business growth.

¹ *National Investment Trust v Christchurch City Council* C152/2007, *Stirling v Christchurch City Council* [2010] NZEnvC 401.

Decisions sought

5. Scentre seeks the following relief:
- (a) That the Crown's submission be allowed.
 - (b) Such further, alternative or other consequential amendments as may be necessary to fully address Scentre further submission as set out above.
6. Scentre wishes to be heard in support of this further submission.

Signature: **SCENTRE (NEW ZEALAND) LIMITED** by its solicitors and authorised agents Russell McVeagh:



Bal Matheson / Daniel Minhinnick

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