

OT1

OT 1

Contact details

Full Name(s) chris Lee

I authorise the person below to represent my submission

Submitter agent's name

Email chrisbcllee@gmail.com

Post

Phone number 033322538

Mobile number 02102599951

**Trade Competition**

I could gain an advantage in trade competition through this submission

No

I am directly affected by an effect of the proposal that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition

Yes

Hearing

I wish to be heard in support of my submission

No

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Yes

Submission

The specific part of the proposal that your submission relates to is:

Proposal to limit office tenancies to a maximum of 500sqm per tenancy

My submission is:

I oppose

The decision I seek is that the proposal:

Be deleted

Amended wording

Reasons for my submission:

This will affect future development opportunities or future value of land owners by restricting the office areas. This will affect future availability of choice and increase costs to businesses. The underlying purpose mentioned was to encourage people to move closer to the city area? Having this bylaw will not address why people are residing in the suburbs, or wish to in the future. Less busy, less traffic, car parking, closer to home, availability of office spaces, suitable size offices, cheaper rent (businesses are under pressure and can't afford higher rents).

Another Comment

The specific part of the proposal that your submission relates to is:

My submission is:

The decisions I seek is that the proposal:

(you must specify your amended wording)

Reasons for my submission

Upload supporting document

Files



The proposed
**Christchurch
Replacement District Plan**

Submit

OT2

For more information go to: proposeddistrictplan.ccc.govt.nz

Submissions must be received no later than Tuesday 22 March 2016.

OT2

1

Make your submission:

Post: District Plan Submissions
Christchurch City Council
PO Box 73001 Christchurch 8154

Online: proposeddistrictplan.ccc.govt.nz

Email: dpreview@ccc.govt.nz

Deliver: Christchurch City Council
53 Hereford Street, Christchurch

2

Submitter details (All details marked with an * must be provided)

Full name(s)* Lynn Anderson or Cantago Properties Ltd.

I authorise the person below to represent my submission: ☒ (tick)

Submitter agent's name Melissa Soal - Thompson Wentworth

Address for service (indicate your preference)*

Email* ☒ (tick) melissa.soal@twl.net.nz

Post* ☐ (tick) PO Box 22626, Christchurch 8142

Phone number* (03) 357 1838

Mobile number* 027 7481 7928

Privacy Act 1993

Submissions are public information. Information on this form including your name and contact details will be accessible to the public on the Independent Hearings Panel (IHP) or the Council websites and at Council service centres and libraries. The Council is required to make this information available under the provisions of the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014. Your contact details will only be used by the Council and IHP for the purpose of the district plan review process. The information will be held by the Council or IHP. You have the right to access the information and request any correction.

3

Trade Competition (All details marked with an * must be provided)

If you are a person who could gain an advantage in trade competition through making a submission, your right to make a submission may be limited by Clause 6(2) Schedule 1 of the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014.

I could gain an advantage in trade competition through this submission.* ☐ Y ☒ N

If you answered Yes to the above statement please complete the following.

I am directly affected by an effect of the proposal that -

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition ☐ Y ☐ N

4

Hearing (All details marked with an * must be provided)

I wish to be heard in support of my submission.* ☐ Y ☒ N

If you answered Yes to the above statement please complete the following:

If others make a similar submission, I will consider presenting a joint case with them at a hearing. ☐ Y ☐ N

Signature of submitter*

Date*



**Christchurch
City Council**



Please use the guidelines to assist you to complete this form.

5

The specific part of the proposal that your submission relates to is:

My submission opposes the limit of 500m² for office tenancies in our location (Riccarton Rd).

My submission is:*

☐ I support ☒ I oppose ☐ I seek an amendment

The decision I seek is that the proposal:*

☐ be retained ☒ be deleted ☐ be amended as follows (you must specify your amended wording):

Our property is located at 76 Riccarton Road and we have a 750m² office tenancy.

When the tenants lease expires in two years time

We will not be able to re-lease as office under this proposal. Our building is not designed for retail and would cost a substantial amount of money to convert it to retail. To split the building in two would also

Reasons for my submission:

Cost a significant amount of money as fire regulations etc will need to be considered.

Our property sits outside of the area where a lot of foot traffic is prominent and therefore retail would not be a viable solution for us.

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Christchurch
City Council



Free



District Plan Submissions
Christchurch City Council
PO Box 73001
Christchurch 8154



Proposed Christchurch Replacement District Plan – Commercial and Industrial Chapters (Part)
Additional Proposal – 500m² GLFA Maximum Tenancy

**Notice of Submission on the Proposed
Christchurch Replacement District Plan**

*Clause 6 of Schedule 1, Canterbury Earthquake (Christchurch Replacement District
Plan) Order 2014*

OT3

To: Christchurch City Council
District Plan Team
PO Box 73013
Christchurch Mail Centre
Christchurch 8154

By email: dpreview@ccc.govt.nz



Submitter: TFT Properties Ltd

Address: c/- Planz Consultants Ltd
PO Box 1845
Christchurch 8140

Contact: Nick Boyes

Telephone: 03 964 4635 or 021 488 938
Email: nick@planzconsultants.co.nz

1. TFT Properties Ltd (the submitter) could not gain an advantage in trade competition through this submission.
2. TFT Properties Ltd wishes to make a submission on the Additional Proposal as part of the Proposed Christchurch Replacement District Plan (PCRD). Specifically these submissions relate to the Commercial and Industrial Chapters (Part) Additional Proposal to introduce a 500m² GLFA maximum tenancy for offices. This Additional Proposal was notified on 9 February 2016.

Introduction/Background

3. The submitter owns a two storey commercial building at 1 Rimu Street, Riccarton. The site has a history of use for commercial office purposes; the present building was constructed in 2014 as an earthquake rebuild. The building has a GLFA of some 950m² over two floors.
4. The building is currently leased to two tenants; one being 717m² (being all the first floor and part of the ground floor), the other being 233m² (the balance area on the ground floor).

Proposed Christchurch Replacement District Plan – Commercial and Industrial Chapters (Part)
Additional Proposal – 500m² GLFA Maximum Tenancy

5. Under the terms of the existing signed lease (November 2014), the larger tenant has the option to lease the balance of the ground floor on termination of that lease. Under the Additional Proposal as notified, this situation would trigger the requirements for resource consent to be obtained.

General Submission Points

6. The primary concern of TFT Properties Ltd is that the Additional Proposal as notified could foreclose the ability to make efficient use of their physical resource (commercial building). This outcome is contrary to Part 2 of the Resource Management Act 1991 (the RMA).
7. The Additional Proposal targets existing and new buildings equally, when it is considered that it is the proliferation of additional new builds that should appropriately be the target of the proposed regulation. The section 32 report accompanying the Additional Proposal appears to be concerned with new buildings and development, yet the provision as drafted applies equally to both new and existing buildings. Furthermore, it appears from reading the transcript of the evidence of Mr Phil Osborne, referred to specifically in the section 32 report (paragraph 3.3), that Mr Osborne was also most concerned with *“the development of any commercial office activity above 500sqm outside the Central City”¹ (emphasis added)*. No specific concern was raised with the use of existing building stock, however, this is now captured by the proposed rule to apply within the Commercial Core Zone.
8. The Additional Proposal as notified will be difficult to enforce. Whilst tenancy areas can be shown for new buildings as part of the Building Consent process, for existing buildings (including new buildings once developed) enforcement of the new rules will be difficult. The Council would only become aware of such changes should the internal layout changes trigger the need for Building Consent.
9. In many situations existing use rights will apply to existing tenancies larger than 500m². However, such existing use rights will have only limited application given the dynamic nature of tenancy arrangements. As outlined in paragraph 5 above, tenancy arrangements often change in response to the needs of individual tenants. Any re-arrangement of existing tenancies that makes any existing tenancy greater than 500m² larger, or increases any existing tenancy over 500m² would trigger the need for consent under the proposed rule. This creates uncertainty and may create difficulties in attracting replacement tenants. There may also be difficulties for existing tenants who will not be able to expand on site, but cannot otherwise move to other premises given they are locked into a lease. Having an existing building sitting idle is not considered an efficient or sustainable use of the physical resources already invested in the building.

¹ Reproduced in paragraph 3.2 of the Section 32 Report.

Proposed Christchurch Replacement District Plan – Commercial and Industrial Chapters (Part)
Additional Proposal – 500m² GLFA Maximum Tenancy

10. The proposed new rule included in the Additional Proposal fails to meet the Order in Council in that it does not reduce reliance on the resource consent processes or reduce the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice (compared with the operative City Plan).
11. The Additional Proposal appears to be at best inconsistent with **Objective 6.2.5** of Chapter 6 of the Canterbury Regional Policy Statement (CRPS), which states:

Support and maintain the existing network of centres below as the focal points for commercial, community and service activities during the recovery period:

- (1) The Central City;
- (2) Key Activity Centres;
- (3) Neighbourhood centres.

These centres will be high quality, support a diversity of business opportunities including appropriate mixed-use development, and incorporate good urban design principles.

The development and distribution of commercial activity will avoid significant adverse effects on the function and viability of these centres.

12. The proposal is also inconsistent with **Objective 15.1.2 a. ii. and v.** of the PCRDP in that the Additional Proposal does not:
 - a) Enable the efficient use and continued viability of the physical resources of commercial centres and promotes their success and vitality, reflecting their critical importance to the local economy; and
 - b) Provide consistency with the role of each centre as defined in 15.1.2.1 Policy – Role of centres Table 15.1 (namely neighbourhood and district centres).
13. The Replacement Plan must enable and encourage recovery and enable a rebuild and recovery that supports long term development of Christchurch. This can be achieved by restricting the proliferation of further commercial office space within the District Centres. However, this does not require regulating existing commercial office space that potentially affects the efficient use of these existing resources moving forward.

Specific Relief Sought

14. TFT Properties Ltd seek the relief sought as set out in **Annexure One** to this submission.
15. TFT Properties Ltd **do** wish to speak in support of their submission on the Additional Proposal for the Commercial and Industrial Chapter (Part).
16. If others make a similar submission they will consider presenting a joint case with them at the hearing.

Proposed Christchurch Replacement District Plan – Commercial and Industrial Chapters (Part)
Additional Proposal – 500m² GLFA Maximum Tenancy

17. TFT Properties Ltd would be satisfied with other and consequential relief or further amendments as are considered appropriate and necessary by the hearings panel to address the concerns set out herein.

Signed:



Nick Boyes, Planz Consultants Ltd

As authorised agent on behalf of TFT Properties Ltd

22 March 2016

ANNEXURE ONE: SPECIFIC TEXT CHANGES:

Relief sought:

The submitters seeks the following changes to the **Commercial Chapter (Part) - Additional Proposal** for a 500m² GLFA Tenancy Cap for Offices:

Amend Rule 15.2.2.1 P10 applying in the Commercial Core Zone as follows
 (amendment shown in red text):

Activity		Activity specific standards
P10	Office Activity	a. Any office activity <u>building erected after February 2016</u> shall have a maximum tenancy size of 500m ² GLFA in a <u>District or</u> Neighbourhood centre. This clause does not apply to the Key Activity Centre at Spreydon/Barrington.

OT4

The proposed
**Christchurch
Replacement District Plan**

Submission FormFor more information go to: proposeddistrictplan.ccc.govt.nz

Submissions must be received no later than Tuesday 22 March 2016.

**1****Make your submission:**

Post: District Plan Submissions
Christchurch City Council
PO Box 73001 Christchurch 8154

Online: proposeddistrictplan.ccc.govt.nz

Email: dpreview@ccc.govt.nz

Deliver: Christchurch City Council
53 Hereford Street, Christchurch

2**Submitter details** (All details marked with an * must be provided)**Full name(s)*** Alexander McMillan TrustI authorise the person below to represent my submission: ☒ (tick)**Submitter agent's name** Bridget Irving / Campbell Hodgson**Address for service** (indicate your preference)***Email*** ☒ (tick) bridget.irving@gallawaycookallan.co.nz

Post* (tick) Gallaway Cook Allan
P.O Box 143, Dunedin

Phone number* () 03 477 7312**Mobile number*** 027 361 6326**Privacy Act 1993**

Submissions are public information. Information on this form including your name and contact details will be accessible to the public on the Independent Hearings Panel (IHP) or the Council websites and at Council service centres and libraries. The Council is required to make this information available under the provisions of the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014. Your contact details will only be used by the Council and IHP for the purpose of the district plan review process. The information will be held by the Council or IHP. You have the right to access the information and request any correction.

3**Trade Competition** (All details marked with an * must be provided)

If you are a person who could gain an advantage in trade competition through making a submission, your right to make a submission may be limited by Clause 6(2) Schedule 1 of the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014.

I could gain an advantage in trade competition through this submission. * Y ☒ N

If you answered Yes to the above statement please complete the following.

I am directly affected by an effect of the proposal that -

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition Y N

4**Hearing** (All details marked with an * must be provided)I wish to be heard in support of my submission. * Y ☒ N

If you answered Yes to the above statement please complete the following:

If others make a similar submission, I will consider presenting a joint case with them at a hearing. Y N

Signature of submitter*

Bridget Irving

Date* 22. 3. 16.

Please use the guidelines to assist you to complete this form.

- 5** The specific part of the proposal that your submission relates to is:
The whole proposal

My submission is:*

☒ I support ☐ I oppose ☐ I seek an amendment

The decision I seek is that the proposal:*

☒ be retained ☐ be deleted ☐ be amended as follows (you must specify your amended wording):

Reasons for my submission:

The proposed maximum tenancy limit is appropriate for areas outside of the CBD. A restricted discretionary activity status indicates that tenancies larger than proposed may be appropriate in some circumstances. Non-notification of proposals to breach the proposed standard is important for allowing existing properties to continue to operate efficiently through changes in tenants and other related matters. This submitter's support of the proposed rule is contingent on the non-notification rules remaining.

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Christchurch
City Council 

Free 



District Plan Submissions
Christchurch City Council
PO Box 73001
Christchurch 8154

SUBMISSION ON THE PROPOSED REPLACEMENT CHRISTCHURCH DISTRICT PLAN
Additional Proposal – Commercial Proposal for a 500m² GLFA Cap for Offices
in accordance with Clause 6 of the Schedule 1 of the
Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014

TO: Christchurch City Council
P.O. Box 73001, Christchurch 8154
dpreview@ccc.govt.nz

SUBMITTER NAME: AMP Capital Investors (New Zealand) Limited

ADDRESS FOR SERVICE: c/- Davie Lovell-Smith Ltd
P.O. Box 679, Christchurch 8140

CONTACT PERSON: Patricia Harte
patricia.harte@dls.co.nz

PHONE: 379-0793

Trade Competition:

We could gain an advantage in trade competition through this submission: ☐ Y ☒ N

If Yes to above, then:

We are directly affected by an effect of the subject matter of the submissions that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition ☐ Y ☒ N

INTRODUCTION

AMP Capital Investors (New Zealand) Limited (AMP) made submission (#1187) to Stage 1 Chapter 15 (Commercial) and further submissions (#1335) supporting/opposing various submissions. AMP's submissions were heard at the hearings along with the opening and closing legal submissions by the AMPs Counsel. As the additional proposal affects the Commercial Core zone (Belfast/Northwood), which is part of the Belfast/Northwood Key Activity Centre, AMP wish to make a submission and be heard.

Position of AMP Group

AMP in its Evidence in chief filed and at the closing and opening legal submissions at the hearings did not oppose the idea for an office tenancy cap of 500m² GLFA. However, AMP now believes that there should be flexibility to allow for office tenancies to be of a size based on the needs of the potential lessees and market demand into the future.

SUBMISSION

The specific Proposal this submission relates to is:

Chapter 15 – Commercial Core Zone

The specific Provision that this submission relates to is:

Commercial Core Zone Rule 15.2.2.1 Permitted Activities: P10 (Office activity)

We ☐ Support ☐ Oppose ☒ seek to have the above provision amended

The Decision we seek is that the provision:

Be ☐ Retained ☐ Deleted ☒ Amended as follows:

We propose the following changes to the provisions, with the suggested deletions ~~struck out~~:

Activity		Activity specific standards
P10	Office activity	a. Any office activity shall have a maximum tenancy size of 500m ² GLFA in a District or Neighbourhood Centre.

The Reasons for our submission is:

1. The limit on office tenancy sizes was first proposed and applied after the Christchurch earthquakes at a time of considerable uncertainty, particularly with regard to the recovery of the central business district (CBD). That degree of uncertainty has diminished considerably due to the Central City Recovery Plan and a concerted effort by various organisations and individuals. Development within the CBD has reached a point where the recovery of the CBD no longer needs to be propped up by limitations on development elsewhere, and certainly not for the next 10 years.
2. The recent evidence provided to the Panel by Mr Osborne (an economist assisting the City Council) does not provide a robust basis for limiting the office tenancy sizes in key activity centres. He has provided generalised advice about the economic benefits of agglomeration of business activity generally and specifically in relation to central business areas. However, he fails to provide any explanation as to economic benefits of limiting office tenancy size in key activity centres and how this will translate into greater recovery of the CBD beyond what is already occurring and will continue to occur under the current planning regime.
3. The CBD is being developed at a pace and there are many further projects in the pipeline. This development in itself significantly reduces the availability of land for further office development. In addition zoning limitations and restrictions on land designated for specific purposes further limits options for office development in the CBD. Specifically the South Frame designation limits office tenancies to 450m² per site and the Mixed Use zone has restrictions on offices which also effectively limit the total to 450m² on most sites. In all these cases urban design approval is also required. The effect of all these restrictions is that there are relatively few places in the CBD where medium to large offices can establish as of right. On the basis of these factors it is expected that the CBD will not be able to provide for long term growth of the City as sought by Commercial Objective 15.1.1. Accordingly it would be wise to provide for additional office growth in suitably zoned areas and in particular in key activity centres.
4. As the CBD is unlikely to provide for all long term growth of medium/large office tenancies it is good planning to provide for this development elsewhere given its importance to the economy. The logical place for this development is in the next layer down in the commercial hierarchy, namely the key activity centres, which are largely composed of Commercial Core zoning and are referred to as "district centres" in Commercial Objective 15.1.2 and in Policy 15.1.2.1 - Role of Centres. The definition of a key activity centre and their role set out in Table 15.1 in Policy 15.1.2.1 is

Major retail destination for comparison and convenience shopping and a focal point for employment (including offices), community activities and facilities (including libraries and meeting places), entertainment (including movie theatres, restaurants, bars) and guest accommodation.

Limiting tenancy size of offices is inconsistent with KACs role of providing employment options. It is also difficult to understand why several smaller offices are acceptable but a single larger office is not.

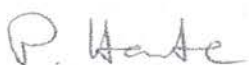
5. In the Commercial Core zone (Belfast/Northwood) the total Office floorspace of 12000m² GFLA is permitted under Rule 15.2.4.1.2.6. It is important to provide some flexibility in tenancy size as the overall limit of 12000m² GLFA, with the staged approach that is currently in place, has the specific purpose of limiting potential impacts on the recovery of the CBD. An additional control on the size of tenancies within office buildings is therefore unnecessary and may limit the effectiveness of providing for office use in this zone, which has the benefit of being a future transport hub and is therefore ideal as a place of employment.
6. The cost of leasing floorspace for any type of use is high in the CBD when compared to other centres around Christchurch. When lessees consider selecting office space, all aspects are considered not just rental costs, and include but are not limited to the type services that they offer, and the location of staff and clients etc. If the lessees consider the CBD to be appropriate to the services they provide and the work environment of staff then they will prefer the CBD over other centres. If the CBD does not provide a good fit then alternative locations should be available in suitably zoned land. The Belfast/North KAC is suitably zoned for office use as it will service and provide employment for people living in northern Christchurch.
7. Mr. Osborne's opinion in his evidence presented to the Panel was that the centres that were close to the CBD posed a "highly competitive risk" to the recovery of the CBD¹. The section 32 evaluation that is part of the additional proposal also identifies that centres close to the CBD will pose a risk to the recovery of CBD. The Belfast/Northwood KAC is located approximately 9.0km from the Central City; given its distance it is very unlikely to have any implications on the recovery of CBD as it is improbable that businesses would be making a choice between the CBD and Belfast. The only other KAC which is similar distance from the CBD is Hornby.
8. We have concerns regarding the benefit of the application process when the tenancy size is exceeded. The matters of discretion refer to the extent to which the proposal "affects recovery of the Central City and its function as the Principal centre". It is hard to imagine how an individual proposal for an office greater than 500m² would ever create a subsequent adverse effect on the CBD's recovery that would justify it being declined. This is in fact what has happened for breaches of a similar office limit in the Central City Mixed Use zone where exceeding the standards makes an activity non-complying. These applications are being granted because there is nothing to indicate that the recovery of the CBD is going to be compromised. This indicates very strongly that such a rule is contrary to the Statement of Expectations and Strategic Objective 3.3.2 which seek to minimise transaction costs and reliance on resource consent processes, as well as reducing the number and prescriptiveness of development controls.
9. We also raise the difficulties associated with monitoring of tenancy sizes as internal walls can be altered or moved to suit the needs of the tenancies. Having a tenancy cap will make it difficult if not impossible to monitor the tenancy sizes over time.
10. With regard to the Belfast/Northwood centre, it is subject to a limit on the amount of retail activity permitted. It is for this reason that alternative uses, such as offices, may need to be considered as

¹ Transcript, page 108, lines 15-21 (Mr Osborne).

part of the make-up of the centre. This option should not be constrained by an arbitrary limit on tenancy size on the unproven basis of potential effects on the recovery of the CBD.

We do wish to be heard in support of our submissions.

If others are making similar submissions we will consider presenting a joint case with them at the hearing.



.....
Signature of person authorised to sign on behalf of submitter

22 March 2016

SCENTRE GROUP

OT 6.

PROPOSED CHRISTCHURCH REPLACEMENT DISTRICT PLAN

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

Submission on: The proposal for a maximum office tenancy limit of 500m² (gross leasable floor area) in particular Commercial and Industrial zones ("**Proposal**").

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

1. INTRODUCTION TO SCENTRE

- 1.1 Scentre is part of the international Scentre Group (which owns the Australian and New Zealand businesses formerly known as the Westfield Group), a vertically integrated shopping centre entity undertaking ownership, development, design, construction, property management, leasing and marketing activities. The Scentre Group has interests in a portfolio of 46 major shopping centres in New Zealand and Australia, valued in excess of A\$14 billion.
- 1.2 Scentre owns and operates a shopping centre in Riccarton, approximately 3 kilometres from the Christchurch Central Business District. The Riccarton shopping centre is Christchurch's oldest and largest shopping centre, and is also the third largest shopping centre, by retail space, in New Zealand. It offers nearly 200 stores, including specialty retail, entertainment, food and hospitality, commercial services, community/education services, health facilities, and a vibrant "mainstreet" environment along Rotherham Street. Scentre's shopping centre also provides integrated and predominantly weather-protected car parking facilities, on-site cycle parking facilities, along with taxi stands and public transport stops on immediately adjacent roads.

2. SCOPE OF SUBMISSION

- 2.1 This submission relates to the Proposal in its entirety.

3. NATURE OF SUBMISSION

- 3.1 Scentre supports the Proposal to the extent that the Proposal gives effect to the established hierarchy of centres.

4. REASONS FOR SUBMISSION

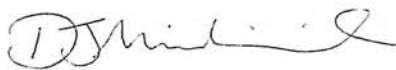
- 4.1 To the extent that Scentre's relief is granted, the Proposal will:
 - (a) promote the purposes of the Canterbury Earthquake Recovery Act 2011, provide consistency with the purposes and provisions of other relevant planning documents, including the Land Use Recovery Plan, and give effect to the Canterbury Regional Policy Statement;
 - (b) promote sustainable management of resources, achieve the purpose of the Resource Management Act 1991 ("**RMA**") and provide consistency with 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 physical resource represented by Scentre's shopping centre in Riccarton for the future; and
- (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.

5. RELIEF

- 5.1 Scentre seeks that the Proposal be adopted to the extent that it gives effect to the hierarchy of centres and is otherwise amended in order to achieve this result.
- 5.2 Scentre could not gain an advantage in trade competition through this submission.
- 5.3 Scentre wishes to be heard in support of this submission.

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



Daniel Minhinnick

Date: 22 March 2016

Address for service: C/- Daniel Minhinnick
Russell McVeagh
48 Shortland Street
PO Box 8
AUCKLAND 1140

Telephone: 09 367 8714
Email: daniel.minhinnick@russellmcveagh.com

ADDERLEY HEAD



OT7

OT7



SUBMISSION ON PROPOSED CHRISTCHURCH REPLACEMENT DISTRICT PLAN

To: Christchurch City Council
dpreview@ccc.govt.nz

Submitter: THE TAIT FOUNDATION and TAIT LIMITED

C/- Adderley Head,
PO Box 16
Christchurch 8140

Contact Person: Paul Rogers
Email: paul.rogers@adderleyhead.co.nz
Phone: 03) 353 0231
Mobile: 021 352 453

SUBMISSION ON PROPOSED CHRISTCHURCH REPLACEMENT DISTRICT PLAN

OT7

Name of submitter

- 1 The Tait Foundation and Tait Limited (Tait)

Trade competition

- 2 The submitter could not gain an advantage in trade competition through this submission.

Hearing

- 3 The submitter does wish to be heard in support of this submission.
- 4 If others make a similar submission, the submitter will consider presenting a joint case with them at the hearing.

Specific provision and proposal

- 5 This submission relates to following parts of the Proposed Christchurch Replacement District Plan ("the Proposed Plan"):
- (a) Proposal For a 500m² GLFA Maximum Tenancy For Offices in the Industrial Park Zone (Tait Campus), specifically Rule 16.4.2.1 (Permitted Activities – Industrial Park Zone)

Submission and decision sought

- 6 The submitter opposes the proposal and seeks the following decision:
- a) That the proposed amendments to Rule 16.4.2.1 are rejected and that there is no restriction on the maximum tenancy size for offices in the Industrial Park Zone (Tait Campus); or
- b) In the alternative and without prejudice to the above, that any restriction on the maximum tenancy size of offices in the Industrial Park Zone (Tait Campus) shall not apply to offices that either:
- i. are associated with high technology industrial activities; or
- ii. have a cooperative or collaborative linkage with other businesses that carry out high technology industrial activities.
- 7 Any other, additional or consequential changes that are necessary to give effect to the intent of this submission.

Reasons for this submission

- 8 Tait Limited is a global organisation, beginning in 1962 with core expertise in mobile radio communications. The company then changed its name to Tait Limited in 2012 to reflect the transition from electronics manufacturer to a global communications solutions provider. The company is headquartered in the Tait Campus, Woolridge Road Christchurch, employing over 400 staff.
- 9 The submitter acknowledges the need to provide for the recovery and revitalisation of the Central Business District (CBD) of Christchurch after the Canterbury earthquakes. However, the submitter does not agree that imposing a 500m² GLFA maximum tenancy cap for offices in the Tait Campus will achieve this.

Collaboration

- 10 In order to deliver on its vision to become a world leading communications business, Tait created the Tait Campus which provides a space to accommodate like-minded high technology businesses that operate in an international market.
- 11 The Tait Campus is a unique industrial park that promotes and retains a focus on collaboration to benefit the tenants who are affiliated to the field of high technology industrial activity.
- 12 There are a range of collaborative benefits and synergies that are associated with aggregating similar businesses in the same location. Co-location effectively creates a technology cluster that provides the opportunity to leverage deep specialist learning and critical knowledge with the ability to interact both formally and informally in a campus environment.
- 13 Other benefits of co-location and collaboration include sharing and leveraging experience with international sales and marketing, establishing an overseas market and application support. It is these benefits that the Tait wishes to retain through co-locating similar businesses at the Tait Campus. Any proposed rules must enable this and ensure efficient use and development in a manner that is consistent with the overall function and role of the Tait Campus.
- 14 For example, locating the head offices of Hewlett Packard or Microsoft office at the Tait Campus would be desirable and complementary to the other activities within the zone. However, with the maximum office tenancy size this would only be possible if their offices were under 500m².
- 15 Amending this rule to allow businesses who are affiliated to the field of high technology industrial activity would support the Tait vision of collaboration. This amendment would support and protect collaboration, rather than detract from the recovery of the CBD.

- 16 Tait's proposed alternative amendment to the rule introduces an additional and appropriate limit on office activities at the Tait Campus, while still ensuring the success to the Tait Campus through collaborative benefits.
- 17 The Tait Campus realised the commitment and vision of Tait Limited to create a collaborative campus to strengthen the hi-tech sector in the surrounding area. The businesses that will benefit from this vision are those that are associated with a high technology industrial activity. These businesses require close proximity to similar businesses in order to achieve and benefit from any collaboration.
- 18 These businesses would therefore not choose to locate in the CBD as there is no scope for collaboration with other businesses which would allow for the benefits that are described above. This is the unique element of the Tait Campus.

Unnecessary Regulation

- 19 The submitter considers that this proposal places an unnecessary burden on potential tenants in the Tait Campus. For the reasons outlined above, there are a specific type of business who would prefer to locate in the Tait Campus. If the office tenancy were over 500m² then the potential tenant would need to apply for a resource consent to gain the benefits listed above through co-location and collaboration.
- 20 Objectives 3.3.2 of the District Plan and Schedule 4, clause (a) of the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014 both seek to minimise reliance on the resource consent process and reduce the number of development controls in the rules in order to encourage innovation and choice. The submitter considers that this proposed rule does not achieve this outcome.

Dated March 22 March 2016



Paul Rogers, Counsel for and on behalf of the Tait Foundation and Tait Limited



The proposed
**Christchurch
Replacement District Plan**

Submission Form

For more information go to: proposeddistrictplan.ccc.govt.nz

Submissions must be received no later than Tuesday 22 March 2016.

DT 8



1 Make your submission:

Post: District Plan Submissions
Christchurch City Council
PO Box 73001 Christchurch 8154

Email: dpreview@ccc.govt.nz

Online: proposeddistrictplan.ccc.govt.nz

Deliver: Christchurch City Council
53 Hereford Street, Christchurch

2 Submitter details (All details marked with an * must be provided)

Full name(s)* KITE ENTERPRISES LTD.

I authorise the person below to represent my submission: ☒ (tick)

Submitter agent's name TREVOR KITE

Address for service (indicate your preference)*

Email* ☒ (tick) tkite@xtra.co.nz

Post* ☐ (tick)

Phone number* (021) 888354

Mobile number* 021 888354

Privacy Act 1993

Submissions are public information. Information on this form including your name and contact details will be accessible to the public on the Independent Hearings Panel (IHP) or the Council websites and at Council service centres and libraries. The Council is required to make this information available under the provisions of the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014. Your contact details will only be used by the Council and IHP for the purpose of the district plan review process. The information will be held by the Council or IHP. You have the right to access the information and request any correction.

3 Trade Competition (All details marked with an * must be provided)

If you are a person who could gain an advantage in trade competition through making a submission, your right to make a submission may be limited by Clause 6(2) Schedule 1 of the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014.

I could gain an advantage in trade competition through this submission.* ☐ Y ☒ N

If you answered Yes to the above statement please complete the following.

I am directly affected by an effect of the proposal that -

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition ☐ Y ☐ N

4 Hearing (All details marked with an * must be provided)

I wish to be heard in support of my submission.* ☒ Y ☐ N

If you answered Yes to the above statement please complete the following:

If others make a similar submission, I will consider presenting a joint case with them at a hearing. ☐ Y ☐ N

Signature of submitter*

Date* 20/3/2016

Please use the guidelines to assist you to complete this form.

5

The specific part of the proposal that your submission relates to is:

MAXIMUM GLFA in Commercial Core Zone of Paparua.

My submission is:*

☐ I support

☒ I oppose

☐ I seek an amendment

The decision I seek is that the proposal:*

☐ be retained

☒ be deleted

☐ be amended as follows (you must specify your amended wording):

~~TIME HAS MADE THIS PROPOSAL OBSOLETE - THERE IS NOW CONSIDERABLE HIGH QUALITY OFFICE DEVELOPMENT~~

Reasons for my submission:

- TIME HAS MADE THIS PROPOSAL OBSOLETE - THERE IS NOW CONSIDERABLE HIGH QUALITY OFFICE DEVELOPMENT IN THE CENTRAL BUSINESS DISTRICT. - THIS PROPOSAL IS NOT NECESSARY.
- PAPARUA HAS VERY LIMITED OFFICE SPACE. EVEN THE LARGER ONES DO NOT THREATEN THE CITY'S CENTRAL BUSINESS DISTRICT.
- MY TENANTS, IN PAPARUA, LEASE 820 SQM OVER TWO FLOORS. THEY HAVE NO NEED TO MOVE TO THE CENTRAL BUSINESS DISTRICT AND IT WOULD BE WASTEFUL AND INEFFICIENT IF THEY HAD TO SPREAD THEIR BUSINESS OVER TWO TENANCIES TO SATISFY THIS RESTRICTION.

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Christchurch
City Council



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District Plan Submissions
Christchurch City Council
PO Box 73001
Christchurch 8154