

COMMENTS ON LAND USE RECOVERY PLAN REVIEW

To: Comments on Land Use Recovery Plan Review
Environment Canterbury
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M Christensen
On behalf of Memorial Avenue Investments Limited

Topic Areas: Direction and Co-ordination / Business

1. Memorial Avenue Investments Limited (**MAIL**) owns the majority of the greenfield priority area for business, located on the corner of Memorial Avenue and Russley Road.
2. LURP Action 24 requires that the Replacement District Plan set thresholds for commercial activities in greenfield priority areas for business where these are considered necessary to avoid reverse sensitivity effects or effects on the viability of key activity centres. Chapter 6 of the RPS includes provisions on the location, type and mix of residential and business activities to be provided for in greater Christchurch, including greenfield priority areas. It directs that commercial activities be primarily directed to centres, while greenfield priority areas are to provide primarily for industrial activities. The Christchurch Replacement District Plan must give effect to Chapter 6.
3. Christchurch City Council has, when preparing the Replacement Plan, interpreted the RPS as requiring a strict centres based approach, which does not enable any office or retail development in greenfield priority areas beyond an ancillary function. The Council has expressly rejected the approach set out in Action 24, declining to consider the effects based reasons for setting thresholds on commercial activities as required by Action 24. MAIL considers this is contrary to the intent of the LURP.
4. Restricting all office and retail development to centres restricts the type of land and facilities available for business activities to those found in the central city or key activity centres. This does not provide the range of locations or facilities required to meet the needs of the diverse range of business activities. Those needs include those relating to occupancy costs, quality of fit out, style of space (for example, low rise and large footprint), and proximity to customer base or workforce. A number of these requirements are not met by the central city or limited

key activity centre locations available. In particular, these locations may not meet the needs of small start-up enterprises, or those in the professional, scientific, technical, administrative and support services.

5. As a result, current interpretation of the RPS and the LURP does not result in a supportive or enabling regulatory environment for, or foster investment confidence in those businesses, as required by LURP Outcomes 4 and 5. The recovery of the central city is demonstrated in the Monitoring Report. Constraints on the commercial activities within greenfield priority areas, beyond those necessary to avoid reverse sensitivity effects or effects on the viability of key activity centres, is not necessary to support recovery of the central city, but is likely to undermine innovation, investment, productivity, and growth in some sectors.
6. MAIL seeks that the LURP and the RPS are amended to provide that for the MAIL site a range of non-industrial uses are appropriate and necessary to ensure that an appropriately high level amenity urban form is achieved on the site, consistent with its 'gateway' position. The thresholds for non-industrial uses should be set to ensure there are no significant adverse effects on the recovery of the CBD.
7. The LURP should also address the issue of possible cumulative effects by requiring non-industrial activities within Priority Greenfields: Business areas to be located primarily within the MAIL site because of its significance as a 'gateway'.