

SCENTRE GROUP

29 May 2015

Environment Canterbury
PO Box 345
CHRISTCHURCH 8140

Attention: Mr Bayfield, Chief Executive

COMMENTS ON LAND USE RECOVERY PLAN REVIEW

Introduction

1. This feedback is provided by Scentre (New Zealand) Limited ("**Scentre**") in accordance with section 5.4 of the Land Use Recovery Plan ("**LURP**"), which directs Environment Canterbury to obtain the views of greater Christchurch communities generally in undertaking its review of the LURP.
2. Scentre owns and operates the Riccarton shopping centre in Christchurch. Scentre has an extensive history of participating in statutory planning processes and has a strong and ongoing interest in the recovery and rebuild of the Christchurch region, particularly through the LURP and the focus of that document on changes to plans, policies and programmes for earthquake recovery reasons.
3. At the outset, Scentre supports the current wording of the LURP and the strong direction that it provides, through the 50 actions, in achieving the vision of the Recovery Strategy for Greater Christchurch. Scentre seeks that this language and direction be carried through in the formal review process.
4. Scentre welcomes the opportunity to provide feedback to Environment Canterbury on the effectiveness of the implementation of the LURP's actions to date. Of the four topic areas set out in the LURP Review Consultation Pamphlet, Scentre has a particular interest in the "Directions and coordination" and "Business" topics. These are discussed in turn below.

Directions and coordination

5. Scentre has a particular interest in Outcomes 1, 3, 4 and 5 within the Directions and coordination topic area, which are:
 1. A clear planning framework directs where and how new development should occur so that it integrates efficiently and effectively with infrastructure programmes and avoids key hazards and constraints.
 3. Land use recovery integrates with and supports wider recovery activity, particularly within the central city.
 4. RMA plans and regulatory processes enable rebuilding and development to go ahead without unnecessary impediments.
 5. A supportive and certain regulatory environment provides investor confidence to obtain the best outcomes from resources used in the recovery.

6. Scentre considers that these outcomes are appropriate in the context of the recovery of the Christchurch region. Scentre also considers that the implementation of these matters need to be prioritised going forward, particularly given Actions 11(iii) and 45 in the LURP, which set out the need for a reduction in consenting and notification requirements; increased clarity and certainty around urban design requirements; and a focus on addressing standards relating to urban design that could negatively impact upon recovery. Scentre considers that these outcomes and actions have not necessarily been given as much weight as is intended by the LURP, particularly in relation to the expected level of communication with the development community, and the level of urban design control and prescription that has come through in the Proposed Christchurch Replacement District Plan ("**Proposed Plan**") process.
7. Scentre acknowledges the work of the Crown through its involvement in the Proposed Plan process in addressing these matters. Scentre also acknowledges the way in which the Independent Hearings Panel has sought, and continues to seek, to implement the LURP outcomes in its decisions on the Proposed Plan.

Business

8. In the Business topic area, Scentre has an interest in Outcome 10:
 10. Key activity centres and neighbourhood centres provide for commercial activity needs and support rejuvenation of damaged areas.
9. Scentre similarly considers Outcome 10 to be appropriate in the recovery context. For the reasons set out above, Scentre also considers that the implementation of this outcome could be better prioritised going forward.

Conclusion

10. Scentre generally supports the current wording of the LURP and the directions provided within it. However, as detailed above, Scentre considers that there is a strong need to focus on the implementation of certain LURP outcomes, in particular Outcomes 1, 3, 4, 5 and 10.
11. Scentre would welcome the opportunity to be involved in the formal LURP review process going forward.

Yours sincerely



Allan Lockie
Development Executive - Scentre (New Zealand) Limited

C/- Daniel Minhinnick
Russell McVeagh
48 Shortland Street
PO Box 8
AUCKLAND 1140

09 367 8714
09 367 8590
daniel.minhinnick@russellmcveagh.com