

**LOCAL GOVERNMENT ACT 2002  
OUR COMMUNITY PLAN – CHRISTCHURCH 0-TAUTAHI 2006/16  
DRAFT LONG TERM COUNCIL COMMUNITY PLAN**

**SUBMISSION BY THE CHRISTCHURCH POLYTECHNIC  
INSTITUTE OF TECHNOLOGY**

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**TO:** Christchurch City Council  
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CHRISTCHURCH

**SUBMISSION OF:** The Christchurch Polytechnic Institute of Technology

**ADDRESS:** Facilities Management Division  
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*(Please note the different address for service on page 6. This submission has been prepared on behalf of the Christchurch Polytechnic Institute of Technology by the Resource Management Group Limited)*

**HEARING:** The Christchurch Polytechnic Institute of Technology wishes to be heard in support of its submissions at the hearings scheduled to occur between 25 May and 7 June.

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**SUBMISSION BY THE CHRISTCHURCH POLYTECHNIC INSTITUTE OF TECHNOLOGY**

Pursuant to the Local Government Act 2002, the Christchurch Polytechnic Institute of Technology (“CPIT”) hereby lodges a submission on the draft Long Term Council Community Plan – Our Community Plan 2006-16 (“the LTCCP”).

This submission is in 3 parts as follows:

- Background information on the CPIT and its property interests in Christchurch; and
- Concerns that the CPIT has with the provisions of the draft LTCCP; and
- The relief sought by the CPIT in terms of the final adoption of the LTCCP.

## **1. BACKGROUND – CPIT**

The CPIT is one of New Zealand's largest tertiary institutions educating approximately 30,000 students per annum and employs approximately 800 full time equivalent staff.

The CPIT has three campuses located in Christchurch and one in Auckland. It also has off campus activities located in various suburban locations within Christchurch. In terms of its principle property interests, the Christchurch sites include the:

- City Campus – Madras Street
- Sullivan Avenue Campus – Corner Ensors Road and Sullivan Avenue
- Seven Oaks Campus – York Street

The CPIT delivers high quality tertiary education services. As part of its ongoing commitment to the delivery of such services it has, over the years, invested heavily in additional infrastructure so as to provide the best facilities for staff and students and to strengthen the institution as a desirable, functional and effective educator. This includes the:

- recently opened Trades Institute Building on the Sullivan Avenue Campus
- refurbished and extended engineering block on the City Campus
- ALX block (the Rakaia Centre)
- Te Matauranga Maori building
- Christchurch Jazz School building

Given the location of the City Campus, and the significant investment in the Campus, the CPIT can be seen as a substantial contributor to central city revitalisation – both in terms of its day to day activities and in the participation and contribution by staff and students in nearby business, leisure and residential activities.

## **2. CPIT CONCERNS WITH THE LTCCP**

### **2.1 Introduction**

As part of its long term planning, the CPIT anticipates further development occurring on its various sites. This is particularly so in the case of the City Campus. By way of introduction, therefore, the CPIT is concerned about:

- the increasing and uncertain cost of development contributions as signalled by the content of the Development Contributions Policy component of the LTCCP; and
- the operational costs associated with the proposed excess water charges and the method of determining water supply allowances; and
- the lack of an identified capital works item to address pedestrian/traffic safety concerns on Madras Street.

Within this context, the CPIT submission is concerned principally with the following components of the draft LTCCP:

- Volume 1 Draft LTCCP
  - Capital Works Programme
  - Funding Impact Statement and Rating Policies
  - Revenue and Financing Policy
- Volume 2 Draft LTCCP Draft Development Contributions Policy; Part A
  - Assessment methods for determining contributions, including Appendix 1 and Appendix 5

## 2.2 Discussion

### 2.2.1 Capital Works Programme – Hagley Ferrymead Ward

The Capital Works Programme maps illustrate a range of planned works in close proximity to the City Campus and this includes:

- Moorhouse Avenue safety improvement works; and
- Moorhouse Avenue street lighting upgrades

The CPIT supports such works in principle. The CPIT is concerned, however, at the apparent absence of any specified item to address safety concerns associated with pedestrian movements across Madras Street between the City Campus and adjacent retail outlets.

CPIT staff and students regularly observe pedestrian/vehicle conflicts as pedestrians attempt to cross Madras Street. The CPIT has previously raised this issue with the Christchurch City Council, in a submission on the first LTCCP, and is concerned that the issue remains unrecognised.

Given this, the CPIT requests that the draft LTCCP be amended to make provision for investigations into this safety issue and provision for subsequent remedial capital works as required.

### 2.2.2 Development Contributions

Volume 2 of the LTCCP provides policy and implementation methods for assessing and taking development contributions. This is largely described in Sections 4 and 5 (pages 18 – 23) of the draft policy and in related Appendices 1 (page 32) and 5 (pages 55 – 57), and it is these sections of the document that are the subject of this particular aspect of the CPIT submission.

First, the CPIT accepts in principle the need for a local authority to obtain development contributions linked to increasing demand for services. It submits, however, that some recognition needs to be made of the

contribution that facilities, such as the City Campus, make in central city revitalisation. Moreover, that such recognition should include discounted or reduced contribution levies, as the absence of such may become a disincentive to further capital investment. From the current reading of the draft LTCCP, no such incentives exist.

Second, a funding model has been developed to determine the amount of contribution to be paid. In summary, for non residential activities such as those which will occur on the CPIT campuses, the assessment is based upon determining the number of House Unit Equivalents (HUE) and multiplying this against a set of standard charges. The charges vary, depending upon location and the network or community service under consideration.

The draft policy attempts to establish a clear and robust mechanism for determining the level of contributions to be paid at the time of development. Appendix 5 of the draft policy is critical to this, as it provides the mechanism for determining the assumed number of HUE's associated with any development proposal. It is noted, however, that on pages 21 (Section 4.4) and 57 of the document that the Council has reserved the right to undertake a special assessment where *"the type of development proposed is not adequately covered by the standard categories... this would include, for example ... education."* At this point it is difficult to determine the impact of such a provision, other than to say that it creates uncertainty as to:

- the nature and extent of information required to support a proposal; and
- the extent and amount of contributions that may be required.

In addition, there is little guidance provided in the policy as to the circumstances in which this approach will be adopted and could potentially lead to the CPIT having to provide substantial additional information to the Council at the time of a relatively minor development proposal. With respect to the last matter the document states (again on page 57) *"the applicant will be required to provide detailed calculations of their developments long-term transport, water supply and wastewater demands (present and future)." Within this context the CPIT opposes the current construction of the policy as it relates to its facilities and seeks greater clarity and certainty as to the determination of contributions required for education related projects.*

Given the complexity of the issues and the scale of some of the CPIT's property interests, it is anticipated that this may require ongoing dialogue.

### 2.2.3 Water Allocation and Excess Water Charges

The LTCCP provides policies for assessing and charging excess water rates (known as a Targeted Rate). The excess water rate is charged on non residential rateable units where the consumption exceeds the allowance. The Plan indicates that excess water usage will be charged at a rate of 45 cents/m<sup>3</sup>. The relevant parts of the LTCCP include:

- Funding Statement and Rating Policies (Pages 238 – 246); and
- Revenue and Financing Policy (Pages 262 – 264)

There are two aspects to the CPIT concerns. First, the method by which the allowance is determined it is not clear from the LTCCP. The CPIT agrees with the principle of excess water supply charges, as it is one method by which the Council can “encourage” water conservation. The issue of concern is whether the method of assigning a water supply allowance fairly reflects a reasonable allocation in the circumstances of the case. The CPIT remains unconvinced that is the case for its three campus sites. Within this context, the CPIT seeks clarity as to the mechanism for determining allocation and, if appropriate, a more robust mechanism for assessing water supply allowance.

Second, as noted above the LTCCP indicates that the excess water usage will be charged at a rate of 45 cents/m<sup>3</sup>. The CPIT has noted that the rate has increased from 33c/m<sup>3</sup> in 2004 to 38c/m<sup>3</sup> in 2005. The significant increase in the rate in the last few years, and the proposed increase to 45cents is significant and unjustified. There appears to be no evidence provided within the LTCCP to support the rate hikes and accordingly the CPIT seeks the retention of the current rate of 38c/m<sup>3</sup>.

### 3. SPECIFIC RELIEF

Given all the above the CPIT seeks the following specific relief:

1. That the LTCCP be amended to:
  - make provision for investigations into pedestrian safety issues at Madras Street adjoining the CPIT City Campus; and
  - make provision for subsequent remedial capital works as required.
2. That the LTCCP recognise the contribution that facilities, such as the CPIT City Campus, make in central city revitalisation. That within this context the LTCCP provide for discounted or reduced development contribution levies.
3. That the LTCCP be amended to provide greater clarity and certainty as to the determination of development contributions required for education related projects.
4. That the LTCCP be amended to provide clear statements as to the mechanism for determining water supply allocation and that, in discussion with the CPIT, agreements are reached on a model for determining an appropriate allocation on a site by site basis.
5. That the LTCCP be amended to retain the current excess water supply charge of 38c/m<sup>3</sup>.

Submission signed for and on behalf of the Christchurch  
Polytechnic Institute of Technology



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Grant McPhail  
Director  
Facilities Management Division

Dated 5 May 2006

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