

Summary submission form

Instructions

Please read before completing your submission

It will help us process your submission if you clearly state the issue you want the Council to consider, what specific action you think the Council should take, and why that should be done.

If you wish, you can present your submission at a hearing. (If that is the case, please tick the box). The hearings will be held between Thursday 25 May and Wednesday 7 June 2006. Generally, 10 minutes are allocated for hearing each submission, including time for questions.

It will help us if your submission also refers to the page of either the full version or the summary version.

Please note: we are legally required to make all written or electronic submissions available to Councillors and to the public. This includes the name and address of the submitter. All submissions will be published on the Council's website from 10 May 2006.

No anonymous submissions will be accepted.

You may send us your submission...

By mail

Please mail your submission (no stamp is required) to:

Freepost 178
Our Community Plan
Christchurch City Council
PO Box 237
Christchurch 8003

By email

Please email your submission to:

ccc-plan@ccc.govt.nz

Please make sure that your full name and address is included with your submission.

On the internet

You may enter your submission using the form provided on the Council's web site at:

<http://www.ccc.govt.nz>

Please follow all the instructions on the web site.

Please remember to indicate if you wish to present your submission in person at one of the hearings.

Please ensure your submission arrives no later than Friday 5 May 2006.

Your submission

You may use this form for your submission on the draft Our Community Plan if you wish. Whether you use this form or not, please include your name, address and contact telephone number with your submission.

Tick one: I do NOT wish to present my submission at the hearing, and ask that this written submission be considered OR

I wish to talk to the main points in my written submission at the hearings to be held between Thursday 25 May and Wednesday 7 June 2006

Are you completing this submission: For yourself On behalf of a group or organisation

If you are representing a group or organisation, how many people do you represent? Numerous

My submission refers to: Full version Page No. Summary version Page No.

Do you also want to respond to: Development Contributions Aquatic Facilities Other

Contact Name BBS Group of Companies

Organisation name (if applicable) Paul A Bradley

Contact Address PO Box 22341 High St.
CHRISTCHURCH

Phone No. (day) 027 283 7933 Phone No. (evening) _____

Email (if applicable) LIVFIELDBIZ@XTRA.CO.NZ

Signature Paul A. Bradley Date 4 May 2006

**Business Building Systems
Group of Companies Ltd**

PO Box 22-341
High Street
CHRISTCHURCH
Ph: 03 374 9068, Fax: 03 374 906
www.lichfieldlanes.co.nz

5th May 2006

Our Community Plan
Christchurch City Council
Email: ccc-plan@ccc.govt.nz
Christchurch

CONTEXT

The Business Building Systems Group of Companies for the last four years has concentrated on property investment and development in the inner City. The Lichfield Lanes precinct has been its most prominent achievement. New purchases may see it active in the High, Manchester, Bedford Row, Cashel junctions. Activities to date have produced revitalisation of buildings and landscapes to allow over thirty new businesses to operate, numerous apartments to function and aesthetic enhancements to attract citizens and visitors to the area identifying it as an urban space with a truly "wow" quality.

Achievement of this state of affairs has occurred largely through the energies of a "family" approach to the revitalisation with the inhabitants, BBS and Council (Mayor and Councillors, specialist and general staff) being daily contributors to advancements.

Business Buildings Systems considers the LTCCP Plan (and more directly the Development Contribution Policy) as an instrument with the potential to nurture the extraordinary progress we have made to date on our joint project of revitalisation of these areas of the inner city or as a destructive force prompting BBS to cease its work and to move to cities where policy is much more enlightened.

Set out below are our general responses to items in the draft plan that we wish to identify as problematic. We have attended all information sessions you have invited us to on the draft plan and believe your records will show our contribution at these sessions has been active and constructive. Our contribution at the "Charrette" week was considerable and we ask for detailed feedback from your office on how the findings of this initiative will be incorporated into your overall Plan for the City. We believe topics like inner city living, one way streets, smart card parking, landscaping and user friendly inner city services for property developers and inhabitants are paramount to success for your plan. We wish to be invited to all hearings on the draft plan of relevance to us in particular

- 1 City Development
- 2 Community Support
- 3 Economic Development
- 4 Capital Works programme
- 5 Regulatory Services
- 6 Significant activities
- 7 Central City Revitalisation
- 8 Development Contributions Policy, both City and Banks Peninsula

and we will be prepared to make oral submission on items where we believe we can add value or point out matters considered ill conceived with rationale to support our claims.

Problems we have with the Plan

"Will it be the sort of place our grandchildren want to live in?"

I believe the "Development Contributions" requirements for inner city development will be the kiss of death for inner city revitalisation. Already we have stopped two developments for low cost inner city dwellings because of development contribution cost. Further plans in Lichfield Lanes are on hold for exciting residential developments in the inner city. Without increased central city dwellers the "town" will die and our grandchildren will visit Pegasus as their town centre.

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Central City Mall is, has never been the vibrant heart of the Central City. The "body" analogy for our city is unhelpful. The critical energy for the central city is not buildings or streetscape. It is people, neighbourhoods and learning communities. Targeted investment must go into support for inner city living, places to live, play, learn and make a living. The Central City Mall does not deserve/need special treatment just let it compete for support with all other urban renewal initiatives.

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"Private developers" The "Development Contribution Policy" is laughable after reading this paragraph. Comments from the Mayor, Councillors and staff for inner city developers to wait to hear what special arrangements might be available to them after the policy has been enshrined are not reassuring. Remissions, special arrangements ought to be scoped as an integral part of this exercise. Tell us what is available now so we can gauge whether the policy deserves any support at all.

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City Mall renovation – see earlier comment

I believe the "targeted rate" proposed is untenable. Consultation on this matter has been totally inadequate. A meeting of all parties who will be affected ought to be called to ascertain whether assumptions held are shared and whether the proposal has majority support.

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Growth in international visitor numbers

In my oral submission I wish to propose an initiative to promote immigration to our city.

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Regulatory Services

Current performance statistics on "Simple responses to complaints or requests" does not make good reading. I believe interaction with regulatory services is not well managed and there seems to be an attitude of "can't do" that is dominant when requests are made. If we want growth for the city this attitude must change. Our Community Plan must include reference to "can do" for these services.

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Sale of Civic Offices

There has been some talk on converting the current Civic Offices into an apartment block..... a concept we strongly support. What would the development contribution payable for such a proposal. I suspect it would stop the proposal dead for any developer. Feedback on this question will be sought by us at the hearing

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Rates Remission Policy

Please provide statistics on rates remissions provided to inner city property investors/developers over the last three years and quantum.

Turners & Growers Site

We were surprised to see no reference to this project in the Plan. We are also very supportive of this initiative. How will this project be treated in terms of the increase in development contribution rates. Once again, I suspect if the strict methodology is applied the whole venture becomes uneconomic.

“We’re Business Friendly

Draft Development Contribution Policy

Please provide us with a reasoned argument on how this policy is “Business Friendly”. Property investors/developers are critical for the wellbeing of our city. It requires a great deal of hard work and risk to be successful. Economic considerations hang heavily on whether projects should start. The policy as it stands with enormous increases has certainly stopped us in our tracks. All our advisors have told us if this policy is adopted we ought to cease activity in the city. We are perplexed at why our regular and consistent plea for reconsideration of this ill conceived policy falls on deaf ears. We have attended all meetings arranged on this matter by the Council and contributed with reasoned argument, facts and solutions.

At every meeting we have been told that our comments are constructive and ideas will be considered in formulation of policy. We have asked for a record of the meetings each time to provide evidence that our energy and contributions are not being missed. No minutes have been provided.

We are left with a view that real consultation is not occurring. We are perplexed at why Council staff are not able to be resolute over advice on this policy development. We have pointed out particularly that a “growth model” methodology for the Central City is not realistic and totally unhelpful linked with a desire to increase the number of inner city dwellers from say 9,000 to 30,000. We keep hearing special policy will be proposed for inner city and each issuing of material on the subject further reiterates that no special consideration has been drafted.

Please advise how you have achieved your stated statutory objective of “transparent, consistent and equitable” and “does not generally act to discourage” development.....” (page 7).

Overview

We have spent the last four weeks providing feedback to council staff, other developers and professional advisors on the development contribution policy. We have been advised that their submissions will contain the legal and technical detail to challenge the council on the pitfalls in the draft policy. We do not wish to use up valuable time and energy in duplicating material. We do wish to place on record our support for all submitters who wish to modify this policy to accommodate our concerns and a reworking of the policy to include real consultation, sound reasoning for the model reflecting local conditions (not Auckland) and taking account of economic viability for especially inner city property investors/developers for any increases proposed.

Thank about your children’s children asking why did our central city die.

Yours faithfully

Paul D Bradley
Director