



SUBMISSION

**Christchurch City Council
Draft Central City Recovery Plan**

15 September 2011

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1. About New Zealand Retailers Association:

The New Zealand Retailers Association (“**NZRA**”) is the most significant body in the country representing the interests of retailers. We represent an industry that has annual sales of \$66 billion and which employs 325,000 people (approx 20% of the New Zealand workforce) in more than 49,000 outlets throughout New Zealand.

Across all store types and areas we have some 5,700 members and they in turn operate some 14,000 shop fronts. These stores range from the majority of large national retailers to thousands of owner operators.

Our membership accounts for 65% – 70% of total retail expenditure (excluding the motor vehicle sector).

Within the New Zealand Retailers Association structure we also have a number of specialty groups and in the main these include retailers, importers, and suppliers of a specific product type. The specialty groups we operate are:

- Bicycle Industry
- Sporting Goods
- Jewellery
- Plumbing Distributors
- Pets/Pet Products/Equestrian Suppliers

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3. Introduction

The NZRA wishes to file the following submission in respect of the draft Christchurch Central City Recovery Plan which is part of the strategy to guide the recovery and rebuild of the Canterbury region following the disastrous earthquakes of September 2010 and February 2011.

The NZRA is impressed with the speed with which the draft document has been produced and regards the overall vision as being both exciting and aspirational.

Christchurch has a great opportunity to rebuild as an outstanding community of the 21st Century.

Key positive components of the vision are:

- A vibrant city centre with defined areas for commerce, retail, entertainment, and residential,
- Development of public transport options that hub on the central city providing access for work and residential activities and for the public facilities that are developed in the area,
- Provisions to create a streetscape that is on a human scale and architecturally interesting,
- Increased emphasis on the water features and parks of the inner city, and the development of laneways to add interest to the street pattern,
- New civic facilities in the central city, including a Convention Centre, Sports hub, and public library.

However, the NZRA believes there are a number of questions raised by the draft plan and we have listed these and comment on them below:

4. Financial Viability

- Despite the incentives, new buildings will be expensive to build, with higher structural costs and design features such as Green elements. Will occupiers be able to be found to occupy the buildings at the rentals that the costs require to support them?
 - The City's former occupants have relocated to the suburbs and to premises commanding significantly lower rentals than any new developments will require in order to be viable.
 - In the suburbs they have had access to readily available staff parking, usually free of charge. Will they return to buildings where access by private motor vehicles is discouraged and secondary to access by bus, cycle, or on foot?
 - Will the cost of "green" features that the plan envisages, limitations on height, costs of requirements to provide cycle parks and disabled parking on a building by building basis, enable economically viable commercial buildings to be built?
 - Regarding height, there were already limitations in the old plan that governed the overall size of buildings, and there is a good measure of

opinion that a lower rise city would be more attractive, and acceptable to inhabitants. All the same, in some inner city sites there are further restrictions on height (such as 3 storey's on the north side of the city mall) that owners ought to be able to compensate for, to some degree, on other parts of their site.

- Many of the previous tenants were attracted to the City by its cheaper rentals. New developments will not be able to provide rentals at these levels.

5. Access, and private motor vehicle parking

- No traffic management plan has been developed. Parking for workers in the central area is strictly minimised and will not meet demand. Even for short term visitors parking is less than convenient. The traffic management is currently built around idealism. Access for private motor vehicles remains essential in a City where currently 80% of all travel is by this means. Attempts to "encourage" cycling, walking and public transport options by actively discouraging the use of private motor vehicles run the real risk of keeping commercial activity out in the suburbs where there are not the same constraints. Ironically this will increase the City's dependence on private motor vehicles as the provision of useful public transport facilities would become almost impossible without a strong hub to the system, and cars would be necessary to get between the far wider spread of commerce in various suburban pocket across the City. While ultimately the bus, cycle, pedestrian options will become more desirable once the City achieves its goal of getting people to live work and play centrally, in the meantime a transition is required, to keep the heart alive during the transformation period which realistically could be decades.
- Traffic flows from the North to the South will be significantly changed by the removal of the one way street system. While the roads will remain as two way, in many cases they will be slowed and through traffic generally discouraged. The load will spread to Fitzgerald Ave in the east and Deans Ave in the West, and these are a very long way apart requiring long detours for some trips across town. And will the avenues be up to the task, or will a bottleneck result.

6. Store size

- In the Retail area, footprints are limited to small shops only (less than 450m²), with an exception for existing larger premises, and the provision of a supermarket is not permitted in the mix. We believe it is essential that there be a mix of store sizes and that there be a good mix of smaller specialist retailers and larger footprint anchor stores, as well as a food offering of some significance.

7. Cycle Parking

- Retail shops are required to provide cycle parking for customers and staff (the latter weather protected) on an individual basis. This is highly impractical in the case of smaller shops, and onerous and inefficient for larger retailers. Centralized cycle parking on a zone by zone basis would be preferable, allowing efficient supervision and better overall management of the spaces being provided.

8. Conclusion

By way of conclusion the NZRA believes that there are elements of the proposals that impede the absolute discretion of a landowner to do as they like with their land, but we accept that some degree of cohesion is required if a good overall result is to be obtained. There is a question of balance, and where the line should be drawn and that needs to be assessed as part of the review of the plan.

9. Appearance

As outlined in our submission, a number of questions are raised by the plan and the NZRA would like to appear to speak to our submission.

New Zealand Retailers Association
September 2011