

WELLINGTON CITY DISTRICT PLAN – DPC77

Submission form on publicly notified Proposed District Plan Change 77

Curtis Street Business Area

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

SUBMISSIONS CAN BE

Posted to	District Plan Team Wellington City Council PO Box 2199 Wellington 6011
Delivered to	Ground floor reception Civic Square/101 Wakefield Street Wellington
Faxed to	801 3165 (if you fax your submission, please post or deliver a copy to one of the above addresses) Please use additional sheets if necessary.
Emailed to	district.plan@wcc.govt.nz
We need to receive your submission by 5pm, Monday 11 March 2013.	

YOUR NAME AND CONTACT DETAILS

Full name Geoffrey Neil Plimmer		
Full address : 66 Creswick Tce		
Address for service of person making submission 66 Creswick Tce, Northland, Wgtn		
Email gplimmer@futureselves.co.nz	Phone 9718254	Fax

TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

I could not gain an advantage in trade competition through this submission.
I could NOT gain an advantage in trade competition through this submission I AM directly affected by an effect of the subject matter of the submission
I am a senior lecturer in the Faculty of Commerce and Administration, Victoria University of Wellington. I live in Creswick Tce, above the area covered by 55 – 85 Curtis St. I have lived in Creswick Tce since 1994.

THE SPECIFIC PROVISIONS OF PROPOSED DISTRICT PLAN CHANGE 77 THAT MY SUBMISSION RELATES TO ARE AS FOLLOWS *(Please continue on separate sheet(s) if necessary.)*

Section 35.2.1 Commercial activity in the Curtis Street Business area

MY SUBMISSION IS THAT

(You should include whether you support or oppose the specific provisions or wish to have them amended. You should also state the reasons for your views. Please continue on separate sheet(s) if necessary.)

My submission relates to the economic viability of the proposed plan changes – for which the case is made in the Property Economics report of October 2012 on the proposed Curtis St Karori Rezoning. Although there are strong ecological, social and health arguments against the proposed plan changes, this submission concerns:

- The weak case for viability, meaning that economic gains are unlikely to compensate for social, health and ecological losses
- Risks of a failed or marginal development being a precursor to special pleading for further changes, such as a conversion to big box retail. Recent high court litigation has demonstrated that WCC is unlikely to resist such pleadings.
- The proposed plan change is bad for economic development because it creates regulatory uncertainty for other businesses, and harms confidence in the integrity of Council processes. It will inhibit investment by other businesses.

There are a number of specific problems with the case for viability.

Poor market definition

The Property Economics Report argues that the majority of food and beverage spending is outside the catchment, and that new retail development would recapture some of this “leakage” more locally. However as the distances to alternatives are small, and Karori and the western suburbs more generally are part of, and well integrated with, the wider Wellington community and economy, the argument that ‘leakage’ is a problem is unfounded. The argument being used is a misleading and overly parochial application of economics.

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Unsubstantiated arguments for demand

The Property Economics Report includes a number of forecasts. Low Karori population growth is estimated on page 14, low retail demand growth on page 15, and low employment on pages 16 and 17. These all suggest continuing low demand for retail space. However on page 18 a very large increase in demand for retail land (427% in 15 years) is forecast. There is no justification for this forecast and it is inconsistent with its population and employment forecasts.

Poor fit with overall retail trends

The forecasts ignore macro retail trends, such as the rise of internet shopping, big box retail and the shift to central city retail. All these undermine the viability of retail arising from the proposed plan changes.

Displaced rather than new economic activity

The report notes that, with economic activity growth low or moderate, existing suburban centres are increasingly likely to struggle. This trend is apparent at the Northland shops, Marsden village and Karori Mall where many businesses, judging by their fit-out and low turnover, are struggling. In the language of the Property Economics report they are at “the

'lower end' of the quality spectrum" (p. 25). Retail development in Curtis St would make existing businesses less viable, possibly fail itself, and likely need substantial alterations (to big box retail) to be viable. This undermining of existing centres would, of course, also be counter to the City Council's policy desire to strengthen existing suburban centres.

Unattractive physical features further undermine appeal as a retail destination

The site is recessed below the road, is damp, gets little light in winter and has overhead lines that are visually unappealing and are a health risk to staff that work underneath them for long periods. These features will further harm its appeal for recreational outdoor retail, and most likely lead to subsequent requests for an expansion of permitted activities.

Poor regulatory management

The 'business case' and proposed zoning changes seem biased toward the interests of the developer. This creates regulatory uncertainty for other business owners (and residents) and is likely to inhibit other economic development. The landowner purchased this property when it was not zoned for development, and so incurred a business risk under the then current regulations. Business are entitled to make decisions with confidence in the integrity of Council regulatory processes and have a legitimate expectation that zoning rules are not changed just because a particular developer wants them changed. The proposed plan change is bad for economic development.

Conclusion

Commercialisation and retail development of any form on the Curtis St site has serious viability risks, which will sheet back to WCC and local residents through poor social, economic and ecological outcomes. It will encourage a plan designed to fail, so that any development can be adapted incrementally to fit developer aspirations for big box retail.

WE SEEK THE FOLLOWING DECISION FROM THE COUNCIL *(Please give precise details.)*

I seek a decision that the proposed plan DPC77 change should be stopped. Proposed law changes to the RMA, and past Council behaviour in relation to this site and others mean that the resource consent process subsequent to the Plan Change is unlikely to protect the interests of local residents.

Geoff Plimmer PhD

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

I do not wish to speak at the hearing in support of my submissions.

JOINT SUBMISSIONS

Y If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

Y No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER

(or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature Geoff Plimmer

Date 11 March 2013

Personal information is used for the administration of the submission process and will be made public. All information collected will be held by Wellington City Council, with submitters having the right to access and correct personal information.

If you are having trouble filling out this form, phone the District Plan Team on 499 4444 for help.