

IN THE MATTER OF

The Local Government Act 2002
("the Act")

AND IN THE MATTER OF

Willis Central

Supplementary Statement of Mark Terence Ashby

INTRODUCTION

1. This statement is in addition to my statement presented at the initial hearing of the Willis Central development contributions matter. My statement has the following intentions. It will:
 - Respond to matters raised in the officer's report to the reconvened hearing.
 - Clarify and restate some of the matters raised by Boulcott Land.
 - Summarise and table additional information provided other experts.
2. At section 4.3, the officer's report refers to 2.6.1 of the Development Contributions Policy ("the Policy") by highlighting the Policy's statement that "the Council will only consider exercising its ^{remission} discretion in exceptional circumstances". I acknowledge this wording and accept that it appears to establish a high bar to the Council's consideration of ~~self~~ ^{remission} applications. ~~assessments~~. However, I believe that the evidence already put before the Council, and additional matters raised today, show that the Willis Central development will have "exceptional" outcomes when compared to the standardised assumptions of the Policy.

WATER AND WASTEWATER

3. On page 3 of the officer's report, the following reference is made:

The provision of water, roading and wastewater, and the planning and design of infrastructure must provide for growth demand often in excess of fifty years. The capital costs of building extra capacity to meet growth demands placed on infrastructure is then recovered from each new development.

4. The need to plan for some aspects of infrastructure demand over long periods such as fifty years is no doubt true. However, the Local Government Act links development contributions

to the 10 year planning horizon established via the LTCCP process. If the officers are saying that the contributions demanded of Boulcott Land are in some way linked to fifty year planning, then I consider that to be unjustifiable and possibly illegal. Boulcott Land needs assurance that the contributions assessed by the Council do not have this intent.

5. The officer's report refers to Willis Central's projected water use and states that "it will not necessarily reduce peak loadings on the network" [compared to other similar sized office buildings]. I fail to see how this conclusion has been reached. Willis Central will use 19.7 litres person / day, as compared with a typical office building which uses 28 litres person / day. Of the 19.7 litres used by Willis Central, only 13.8 litres will be drawn from the City supply. In other words, Willis Central will typically use City supplied water at half the rate of standard office accommodation. Even if Willis Central's rainwater supply was exhausted, the rate of use would still only be 70% of a standard office.
6. Over the course of a working year, the office population of Willis Central is expected use up to 7.7 million fewer litres of City water. In addition, the building will generate around 4.5 million fewer litres of wastewater – a figure that will not alter, regardless of the proportion of water drawn from the City supply. In my opinion, these are clear examples that peak loadings will definitely be reduced. It shows that the building does indeed create "exceptional circumstances" that justify a reduction in the level of development contributions.
7. For clarification of the figures used in these estimates, I have provided a comparison between Willis Central and a typical office building as Attachment "A".

GREEN BUILDINGS

8. On page 4, the officer's report states that "the marginal saving in the cost of constructing the infrastructure required to provide the service expected by a green building system is negligible". The report goes on to say that these savings "would only be noticeable if a large number of buildings were employing sustainable measures over a period time". I take issue with both of these statements.
9. Firstly, the system of contributions established by the Local Government Act is not about the value of "marginal savings" within an entire infrastructure network. The Act's intention is to

allow charges to be imposed to remedy actual capacity effects caused by an individual development. In this case, Boulcott Land has shown the capacity effects to be minimal.

10. Secondly, the officer's report states that it would take a great many green buildings to make a noticeable difference to infrastructure demand. On the contrary, Willis Central's water and wastewater effects are about half that of a typical development – so it would actually take relatively few similar developments to make a difference. The officer's inference also appears to be that we should 'give up' on seeking increased building sustainability because a single battle won't win the war. If that is the message, it is completely inconsistent with the Council's other messages on sustainability.
11. Willis Central's green star focus isn't just related to the infrastructure covered by the Policy. For example, the design of electrical systems in the building will mean that electricity use is substantially reduced. As evidence of that fact, I refer to the Attachment "B". Figure 1 in the attachment shows that, from a database of 52 Wellington CBD office buildings, the mean electricity usage is equivalent to 164 kWh/m²/year. In contrast, Willis Central will consume 120 kWh/m²/year. The energy 'saved' will be equivalent to 1.3 average Wellington office buildings (based on the buildings on the database).

TRAFFIC AND TRANSPORT

12. In relation to the traffic and transport aspect of the development contribution, the officer's report acknowledges that there will "only be a modest increase in the number of on-site carparks and therefore a small increased demand by car users on Boulcott Street". However, the report claims that there will be increased pressure elsewhere on the roading system, to a level which justifies the significant contribution of around \$247,000 (inc. GST).
13. The Policy bases its contribution level on 10 vehicle trips per EHU / day (equivalent to 3.8 trips / person). The officers have used this assumption to its fullest extent by assuming that every person counted via the EHU process will each make 3.8 trips private vehicle trips, every day. Under that method of calculation, Willis Central will generate 3,056 vehicle trips / day.
14. In contrast, Traffic Design Group (TDG) have examined the reality of trip generation, and calculated that the building will generate only 1,334 vehicle trips / day. The TDG assessment

is based on the modal split of employees travelling to work in Wellington (established via the 2006 Census), where only 29% of workers drive a private vehicle and 36% take public transport. The level of contribution required in relation to traffic and transport should therefore be substantially less than that assessed by the officers. The TDG assessment is attached as “C” to my statement.

15. In my opinion, the TDG assessment should be preferred to that of officers because it reflects surveyed reality, rather than the generalised assumptions of the Policy. It is demonstrably wrong to assume that every worker in an office building will make nearly 4 private vehicle trips per day, especially in a city that is well known for its high levels of public transport use and walkability.

INTENSITY OF DEVELOPMENT

16. At section 4.4, the officer’s report refers to the “intensity of development” on the site, which it states to be “significantly greater than the norm”. The report’s basis for this statement is that the number of workers in Willis Central will be equivalent to about one per 12m², whereas the Policy assumes one per 25m² (2007 Policy) or 21m² (2009 Policy). In my opinion, these references to the intensity of development are misleading and something of ‘red herring’. The number of people on a site is irrelevant as a stand alone measure. It is the effects on infrastructure that those people have which is the important consideration. As shown by Boulcott Land’s evidence, the actual effects of Willis Central will be much smaller on a ‘per person’ basis than assumed by the Policy.
17. However, to directly address the question of intensity, I refer the Council to its district plan. On the Willis Central site, the district plan sets a basic height limit of 90m - 95m above sea level. I note that this would be a building of around 25 storeys on the site, as opposed to the 14 storeys actually being built. Having regard to the height limit, and the mass thresholds of Plan Change 48, I calculate that it would be easily possible to gain consent for around 69,000m² of floor area on the Willis Central site. Using the Council’s assumptions about space per worker, that floor area would equate to around 2,700 to 3,300 workers on the site. In other words, with 2,300 workers, Willis Central will have around 70% to 85% of the office population anticipated by the Policy and district plan. The officer’s negative statements about intensity of development should therefore be completely discounted.

HERITAGE

18. In section 4.7, the officer's report states that "the Policy makes no allowance for remissions of development contributions on the basis of either voluntary or involuntary contributions to built heritage". I consider this statement to be incorrect. In my opinion, Council has the ability to consider any matter under section 2.5.5.1(d) of the Policy, which states that:

*The Council may determine an application [for self assessment] made under this part at its discretion. In doing so the Council must take into account everything presented to it by way of the written application, and may take into account **any other matter(s)** it considers relevant.*

19. With specific regard to heritage, I refer the Council to Attachment "D" which sets out the amount expended in rehabilitating the heritage fabric of the McCarthy Building (Tisdall's). Although the façade is listed as a heritage item in the district plan, the heritage foyer and stairwell is not. Notwithstanding the lack of listing, Boulcott Land is refurbishing the foyer and stairwell areas. Out of the total McCarthy Building refurbishment costs of \$2.1 million, the work on the foyer and stairwell areas alone will cost a minimum of \$100,000 (not including overall costs related to integration into the wider Willis Central development). In short, this is \$2.1 million gifted to the heritage fabric of the City, and a matter that the Council can have regard to under section 2.5.5.1(d) of the Policy.

GROWTH ASSUMPTIONS

20. I will conclude my statement with some observations about growth and changes to the building stock in the Wellington CBD. The Policy makes assumptions about growth, which are 10% in the residential sector and 11% in the commercial sector (2009 – 2019). These assumptions about growth are what drive estimates of future infrastructure capacity requirements, which feed into the LTCCP, and into the dollar values set for development contributions. The Council's assumptions about growth were based on work completed in 2008, at the height of the development boom.
21. In contrast, attached as Appendix "E" is some commentary on office growth in Wellington City. Referring to Figure 1 of that commentary, employment growth can be seen to have increased at a steady rate up to 2008 when the Council's growth assumptions were made. However, beyond that time, recorded employment has fallen and is projected to continue its

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fall until 2012. After that date, employment levels will remain flat or experience only minor growth, and will not return to 2008 levels until sometime after 2015. The same trend is reflected in the amount of occupied CBD office space, shown by Figure 2.

22. The slow growth in occupied office space should be a significant consideration when considering the case of Willis Central. The officers have assumed that the office space vacated by Telecom in moving to Willis Central will be ‘backfilled’ quickly by new tenants. That assumption is the underlying justification for requiring development contributions, as the officers view the infrastructure effects of Willis Central as ‘additional’, rather than being a relocation of effects. However, the assessment provided as Appendix E notes that:

Approximately 90,000 square metres of office space is currently under construction [throughout the Wellington CBD]. The majority of this space is pre-let to organisations currently occupying space within the CBD. As these occupiers vacate their existing premises and shift into new buildings significant vacancies will appear across the market which will take a long time to absorb.

23. The assessment also notes that the long term real long term trend is for occupied office space to increase by 4,000m² to 6,000m² per annum. Using the Council’s per worker space figures of 21m² to 25m², the annual growth in occupied space across the CBD is therefore the equivalent of 160 to 285 new workers each year. Put another way, a worker population equivalent to Willis Central will not be added to the City immediately through backfilling of vacated space, but could easily take 10 years or more to accrue – which is the life of the Policy’s planning period. In addition, Willis Central cannot be held accountable for all of that actual growth over the 10 year period. In my opinion, these facts support Boulcott Land’s argument that Willis Central substantially represents a relocation of existing infrastructure effects, rather than being a totally new and additional effect.

24. What does this mean in relation to the development contributions Policy? I cannot provide an in depth analysis, but the implication seems reasonably clear. That is, the development contributions Policy is, at least in part, based on assumptions about growth that are incorrect. If the Council is looking for “exceptional circumstances”, it needs to look no further than the Global Financial Crisis and the long term effect it has and will continue to have on employment in Wellington’s CBD. As a direct result, the timing and need for infrastructure

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fall until 2012. After that date, employment levels will remain flat or experience only minor growth, and will not return to 2008 levels until sometime after 2015. The same trend is reflected in the amount of occupied CBD office space, shown by Figure 2.

upgrades, projected by the Council in relation to CBD development, should be closely examined – as should the link to assumptions about development contributions.

SUMMARY

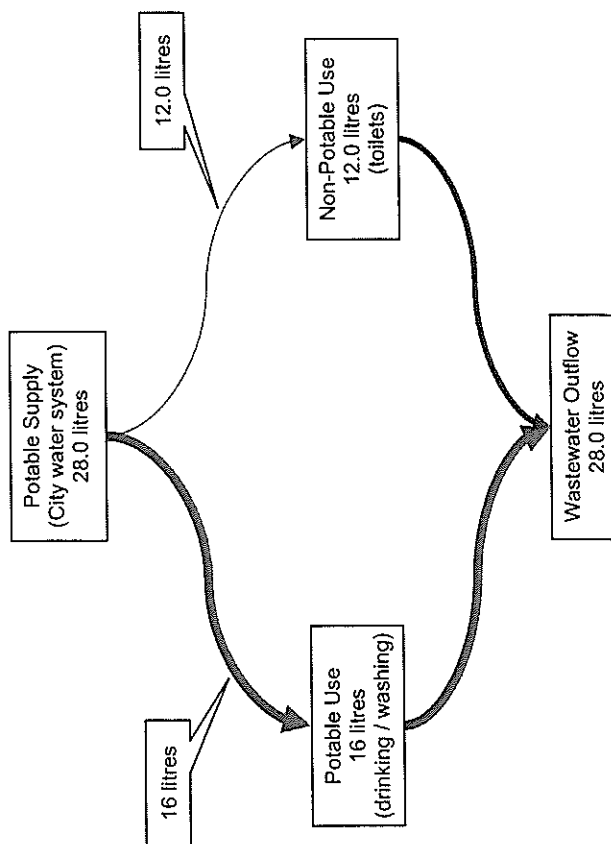
25. Boulcott Land's self assessment, my original statement, and this supplementary statement set out relevant facts that should assist the Committee. Those facts are:
- The actual impacts of Willis Central on infrastructure capacity are known with a high degree of certainty.
 - Actual impacts can be used to derive development contributions that are more equitable than those derived via the broad averaging of the Policy's standard approach.
 - The Council's officers have persisted in applying measures of effects on infrastructure that are demonstrably wrong in the context of the actual development.
 - Willis Central is a type of development that should be encouraged through recognition of the reduced impacts it has on the demand for increased infrastructure capacity.
 - Other matters as referred to by Mr Anastasiou.
26. In my opinion, these add up to exceptional circumstances where the Council has the ability to substantially reduce the required level of development contributions.

Mark Ashby

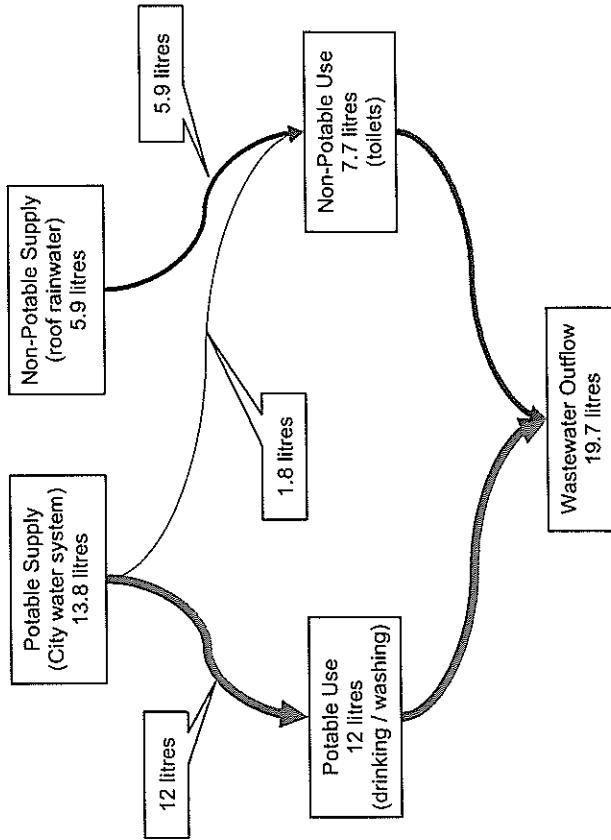
21 April 2010

Comparison of City Supplied Water Use / Wastewater Outflow

Typical Office Building
(Per Person)



Willis Central
(Per Person)



Outcomes

	City water use	Wastewater outflow
person / day	14.2 litres less	8.3 litres less
Willis Central / day	33,000 litres less	19,000 litres less
Willis Central / year	7.67 million litres less	4.49 million litres less

Based on 2,300 workers in Willis Central, and a 235 day working year



The Wellington Company
PO Box 24 379,
Manners Street,
Wellington
Attn: Ian Cassels

20 April 2010

Willis Central – Energy Consumption Reduction

Dear Ian

You have asked us to estimate the effect on energy consumption as a result Telecom's consolidation of office space into their new premises at Willis Central.

Background

Simply Energy is well placed to provide this type of assessment because we work with building owners to support the establishment of embedded networks in commercial buildings. This means we have a large database and empirical metered data on the energy intensity of a large number of Wellington office buildings.

Energy consumption reduction calculation

Telecom's move into Willis Central will reduce energy consumption by 2GW per year.

This level of saving is equivalent to 1.3 average Wellington Office buildings.

The calculation is set out in Table 1.

Table 1. Reduction in Energy Consumption due to Telecom's move to Willis Central

Description	Units	Base Case	Willis Central
Telecom staff	People	2,300	2,300
Net lettable area per person	m2/ person	12.0	8.3
Total office area utilised	m2	27,600	19,000
Building Energy Intensity	kWh/m2/year	164	120
Energy per year	kWh/year	4,533,658	2,280,000
	MWh/year	4,534	2,280
Estimated energy saving	MWh/year		2,254
Average building			1,692
Equivalent consumption for this number average buildings			1.3

This calculation is based on the difference in energy consumption between:

- Base case

info@simplyenergy.co.nz
P 0508 4SIMPLY
P 0508 474 6759
F (04) 472 7775

Wellington Office
Level 4, James Cook Arcade
294-296 Lambton Quay

Auckland Office
196a Jervois Road
Ponsonby

PO Box 10609
The Terrace
Wellington 6143
New Zealand

- Average energy intensity derived from our database of 52 Wellington Office buildings, many of which are metered at the gate of the building.
- An average net lettable area of 12m² per person (data provided by The Wellington Company)
- Willis Central
 - Willis Central's modelled energy intensity of 120kWh/m²/year (or less)
 - Telecom's net lettable area of 19,000m² including staff that are hot desking

These consumption reductions assume a steady state vacancy rate across the total stock of Wellington office space.

Yours sincerely



Stephen Peterson

Encl. Energy intensity frequency distribution
Energy intensity descriptive statistics
Willis Central Certificate of Modelled Energy Intensity

Figure 1. Distribution of Wellington Office building Energy Intensity

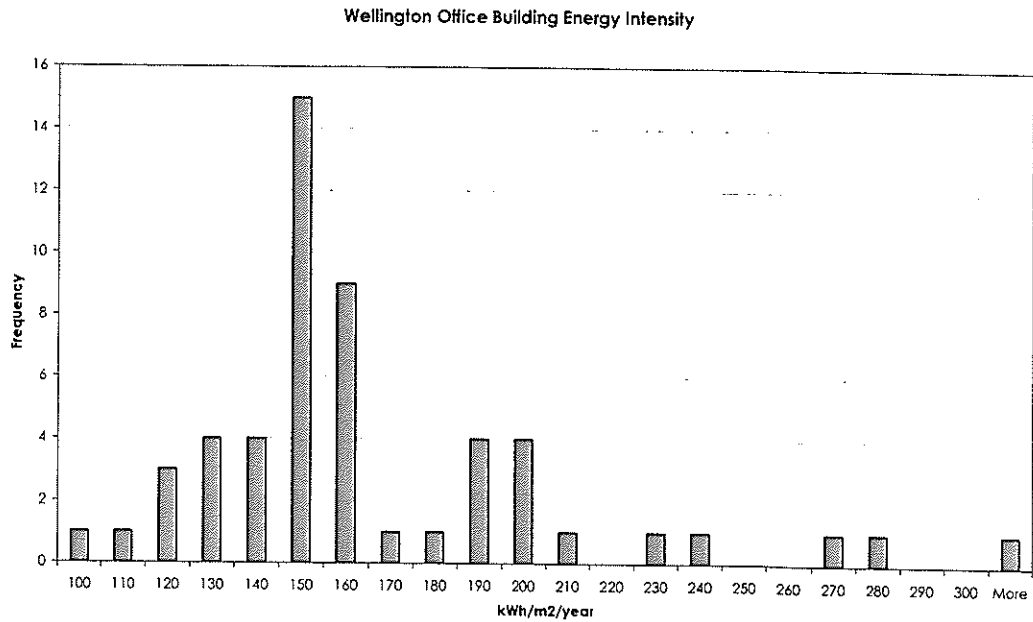


Table 2. Building Energy Intensity Descriptive Statistics

<i>Energy Intensity Stats</i>	
Mean	164.3
Median	150.0
Mode	150.0
Standard Deviation	42.4
Count	52.0

Figure 2. Willis Central Certificate of Modelled Energy Intensity

5.3 Energy

**Willis Central
NZGBC Office Design Rating Tool Check Sheet**

ENE-1 Energy	
<p>Criteria: It is a Conditional Requirement for obtaining a NZ Green Star - Office Design Certified Rating that the base building design achieves an energy use figure of 120 kWh/m²/yr or less using the modelling method in NZS 4243/4218.</p> <p>AND Off-axis scenarios are adopted to ensure the validity of energy models, see manual.</p>	
Points Available:	Conditional Requirement
Points Claimed:	Achieved
<p>Compliance Requirements: An energy modelling report describing the modelling process for the office building in accordance with the listed requirements in Additional Guidance. Extracts from the design brief and specification(s) and design drawings (see 'Additional Guidance') to demonstrate that all modelling data used in the energy simulation reflects the current design.</p>	
<p>Documents Provided: •</p>	
Sign Off Client	Date
Sign Off Evidence Provider	e3BW Date



Traffic Design Group



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PO Box 30-721
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F +64 4 569 2398
W www.tdg.co.nz

9757/3
20 April 2010

Mr Mark Hughes
Project Manager
Gill Consultants
P O Box 11405
Manners Street
Wellington 6140

Copy via email: mark@gillconsultants.co.nz

Dear Mark

Willis Central Development Contributions Self Assessment Traffic and Road Component

Following a briefing with Mr Mark Ashby at Aurecon, the assessment summarised in this response sets out to review and determine an appropriate and reasonable level for the traffic and roading component of the financial contributions associated with the Willis Central development.

We note that Aurecon completed a self assessment of the development contributions as set out in a letter to you of 29 July 2009. That assessment included a recommended traffic contribution of \$5,170. Wellington City Council then produced an assessment dated 17 March 2010. The Council assessment included a recommended traffic and roading contribution of \$219,420.80 (ex GST).

A brief summary of each of these assessments along with our own independent assessment are set out below.

1. Applicant's Traffic and Roading Contribution Assessment

The Applicant's self assessment included a comparison between the pre-existing and proposed carpark space provision on the site. Some additional 17 carpark spaces would be provided with an assessed increase in traffic activity of 72 trips per day, including some allowance for service vehicles.

With a traffic and roading contribution of \$718 per EHU and with the Development Contributions Policy (July 2007) setting out that each EHU is assessed as having ten private vehicle trips per day, a traffic and roading contribution of \$5,170 (72 trips x \$718) was determined.

2. Council's Traffic and Roothing Contribution Assessment

The Council's assessment is based on the GFA of the proposed development. The total GFA of 27,466m² is reduced to 21,294m² with allowances made for the existing GFAs of the Airways and McCarthy Buildings and the Boulcott Street townhouses.

The proposed development is assessed as being equivalent to 305.6 EHUs with an associated traffic and roading contribution (ex GST) of \$219,420.80 (305.6 EHUs x \$718).

3. Traffic Design Group's Traffic and Roothing Contribution Assessment

It is understood that the proposed building will accommodate around 2,300 staff.

The most recent 2006 census data includes journey to work statistics which set out the mode of transport used by employees in travelling to their place of work. The following travel mode split was recorded for people working in the Central Wellington Area Unit in which the proposed building is located:

- 29% drove a private vehicle or a company vehicle
- 7% were a passenger in private vehicle or a company vehicle
- 8% either worked from home or didn't go to work
- 36% used public transport (public bus and train)
- 1% used a motorcycle
- 2% cycled
- 15% walked or jogged
- 2% travelled by other non-stated modes.

Accordingly, from this data, an average of some 667 staff (29% of 2,300) could be expected to drive to work with an associated trip generation of 1,334 vehicle movements per day. Assuming that vehicle activity associated with the use of company vehicles, visitors and servicing for the new development approximately balances pre-existing traffic activity associated with the Airways and McCarthy Buildings and the Boulcott Street townhouses and carpark, then the additional vehicle traffic activity generated by the site can be reasonably calculated at some 1,334 vehicle movements per day.

By comparison, the Council assessment determines that the proposed development is equivalent to 305.6 EHUs which gives an associated larger trip generation of 3,056 vehicle movements per day at the nominated rate of ten private vehicle trips per day per EHU. From the outline above, our assessment is that the site can be expected to generate a somewhat overall lesser traffic impact of around 1,334 private vehicle movements per day, being 44% of the Council's forecast. Accordingly, we consider that, even using the Council's methodology, a financial contribution of \$95,781.19 (44% of \$219,420.80) for traffic and roading is both appropriate and reasonable given the particular locational

characteristics of the building within the city and the travel practices of Wellington commuters.

We would be happy to further discuss and clarify the detail of our fuller appraisal that supports this summarised assessment, and trust you will be in touch should you require anything further.

Yours faithfully
Traffic Design Group Ltd



pc Harriet Fraser
Principal Transportation Planner



Mark Georgeson
Director

(D)



GILL CONSULTANTS

16 April 2010

Boulcott Land Limited
Level 12, iCentre
50 Manners Street
WELLINGTON

Attention: Ian Cassels

Dear Sir

WILLIS CENTRAL PROJECT – TISDALLS BUILDING

Please find attached an estimate of the costs incurred in retaining and restoring the Tisdalls building as part of the Willis Central Project.

These costs do not include finishing trades (flooring, painting etc) nor generic services (mechanical, electrical, hydraulic, fire) as these would be common to other options.

The best estimate currently available on the façade alone is covered by items 4, 13 and 14 (\$500,000.00) or 30%. This would give a total ROC of \$646,000.00 out of the total of \$2,153,500.00.

Yours faithfully

MARK HUGHES

TISDALLS INCORPORATION INTO WILLIS CENTRAL**ROC Value**

1	Demolition & Enabling Works	145,000.00
2	Storage and reuse of salvaged items	25,000.00
3	Temporary Steel (incl foundations & removal)	260,000.00
4	Structural Upgrade to remaining Façade (incl sprayed concrete and permanent structural steel)	300,000.00
5	New floors, columns and beams	350,000.00
6	Reinstate Toilets (6 no WC's complete incl Hydraulics)	60,000.00
7	New fire glazing and walls to existing heritage stair (not included in heritage refurbishment work)	50,000.00
8	Shopfront upgrade	55,000.00
9	Feature lighting	27,500.00
10	Borrowed light Upgrade	16,000.00
11	Level 3 deck (including screeds, membrane and pavers, handrails etc)	45,000.00
12	Heritage Refurbishment of Main Entry & Stair	100,000.00
13	Heritage Refurbishment of Façade (incl clean, make good, paint etc)	100,000.00
14	Heritage Refurbishment of Canopy	<u>100,000.00</u>
		1,633,500.00
	Contractor P&G	145,000.00
	Contractor Margin	90,000.00
	Design & Fee's	150,000.00
	Heritage	25,000.00
	Archeologist	5,000.00
	PM	<u>105,000.00</u>
	Total ROC (excl GST)	<u><u>2,153,500.00</u></u>



Mr I Cassels
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Our Ref: R100013

19 April 2010

Dear Sir

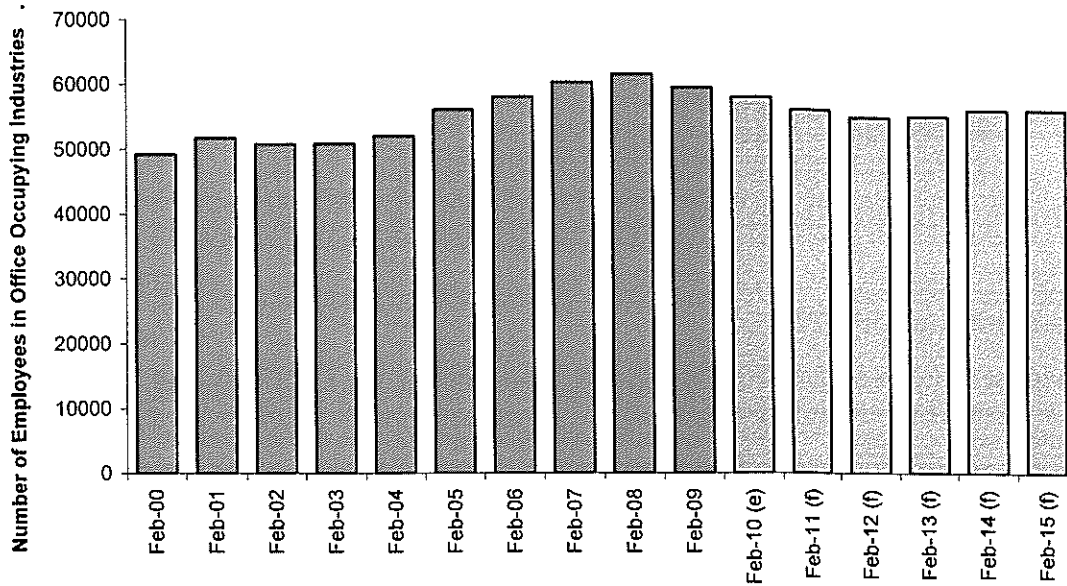
Trends in Wellington's CBD Employment and Office Building Occupancy Rates

Thank you for the opportunity to provide you with an overview of our analysis of trends within Wellington's CBD office market. We understand you require this as background information to be used in discussions with Wellington City Council over development contributions associated with Willis Central. Our analysis focuses on:

- CBD employment trends and office building occupancy; and
- Refurbishment and change of use opportunities for vacated office space.

Figure 1 presents the trend in the number of people employed in Wellington's CBD in key office occupying sectors over the 2000 to 2009 period. It also presents Darroch's forecasts to 2015.

Figure 1: Trend in the Number of People in Employed in Wellington's CBD



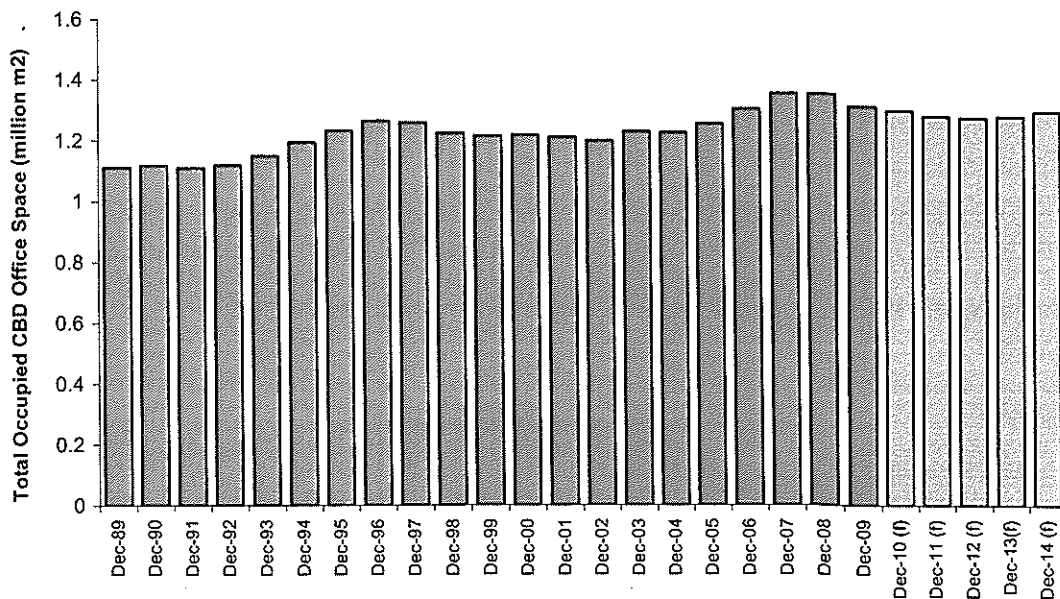
Source: Statistics New Zealand and Darroch Ltd

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Total employment peaked in the CBD in 2008 and subsequently fell in the key office occupying sectors¹ by 3.2% over the next 12 months. It is likely that employment levels will continue to fall in the short term. Our forecasts imply CBD employment in the office occupying sectors will decline over the over three years by a total of 4,650 people. Employment levels will then stabilise before starting to increase. Significant changes in the way in which Statistics New Zealand collects employment data in their Business Demography survey makes longer term employment trend comparisons problematic.

The amount of occupied office space has followed a similar trend to CBD employment. Figure 2 presents the trend in the total area of occupied office space in Wellington's CBD.

Figure 2: Total Occupied CBD Office Space



Source: Telfer Young and Darroch Ltd

In the latest cycle the amount of occupied office space peaked at 1.354 million square metres in late 2007 and has subsequently declined by 2.9%. It is likely that the area of occupied space will decline over the next two years. The fall in occupied space will reflect changes in demand from the private and public sectors. The National led administration is likely to continue to place pressure on public sector employment whilst the private sector continues to adjust to the changed economic environment. Our mainstream scenario forecasts a fall in the amount of occupied office space of -37,500 square metres over the next three years before starting to recover. This will result in the total area of vacant office space increasing from 150,000 to 270,000 square metres of office space by December 2012

¹ Key office occupying sectors includes the communication, finance and insurance, property and business service, and public administration sectors



The long term trend is for the amount of occupied office space to increase by between 4,000 and 6,000 square metres per annum. The low level of underlying growth in the amount of occupied office space presents the office market with some interesting challenges. Approximately 90,000 square metres of office space is currently under construction. The majority of this space is pre-let to organisations currently occupying space within the CBD. As these occupiers vacate their existing premises and shift into new buildings significant vacancies will appear across the market which will take a long time to absorb.

In the last office cycle, during the mid to late 1990s, over 110,000 square metres of office space was removed from the office market and converted to alternative uses. These included apartments, student accommodation, and hotels. At this point of the cycle, we do not expect this trend to be repeated. The apartment market is now more sophisticated with a clear preference for new purpose built units unless the building has significant architectural character/merit. Some limited opportunities may exist for student and / or hotel conversions. One other potential user could be the education sector. However, all these uses are unlikely to significantly reduce the amount of unoccupied office space.

The over-supply of office space, albeit likely to be concentrated at the lower end of the office market, could produce a significant drag on the market and take a long period to work through. Effectively, it took the office market the best part of 18 years to recover from the boom bust cycle of the late 1980s. It is hard to see any significant recovery in office market fundamentals until we see a change in policy from those currently being promoted by the National led administration.

If you have any queries or comments please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read "IEM", followed by a horizontal line.

Ian Mitchell
National Director - Consulting and Research