

Hearings Panel

Draft Development Contributions Policy 2021

AGENDA

Notice of Meeting:

A Hearings Panel meeting will be held on:

Date: Friday 21 May 2021
Time: 1pm
Venue: Council Chambers Level 2, Civic Offices,
53 Hereford Street, Christchurch

Panel

Chairperson	Deputy Mayor Andrew Turner
Members	Councillor Jimmy Chen
	Councillor Melanie Coker
	Councillor Pauline Cotter
	Councillor Catherine Chu
	Councillor James Daniels
	Councillor Mike Davidson
	Councillor Anne Galloway
	Councillor James Gough
	Councillor Yani Johanson
	Councillor Aaron Keown
	Councillor Sam MacDonald
	Councillor Jake McLellan
	Councillor Phil Mauger
	Councillor Tim Scandrett
	Councillor Sara Templeton

21 May 2021

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Ōtautahi-Christchurch is a city of opportunity for all

Open to new ideas, new people and new ways of doing things – a city where anything is possible

Principles

Being open, transparent and democratically accountable	Promoting equity, valuing diversity and fostering inclusion	Taking an inter-generational approach to sustainable development, prioritising the social, economic and cultural wellbeing of people and communities and the quality of the environment, now and into the future	Building on the relationship with Te Rūnanga o Ngāi Tahu and the Te Hononga-Council Papatipu Rūnanga partnership, reflecting mutual understanding and respect	Ensuring the diversity and interests of our communities across the city and the district are reflected in decision-making	Actively collaborating and co-operating with other local, regional and national organisations
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Community Outcomes

Resilient communities Strong sense of community Active participation in civic life Safe and healthy communities Celebration of our identity through arts, culture, heritage, sport and recreation Valuing the voices of all cultures and ages (including children)	Liveable city Vibrant and thriving city centre Sustainable suburban and rural centres A well connected and accessible city promoting active and public transport Sufficient supply of, and access to, a range of housing 21st century garden city we are proud to live in	Healthy environment Healthy water bodies High quality drinking water Unique landscapes and indigenous biodiversity are valued and stewardship exercised Sustainable use of resources and minimising waste	Prosperous economy Great place for people, business and investment An inclusive, equitable economy with broad-based prosperity for all A productive, adaptive and resilient economic base Modern and robust city infrastructure and community facilities
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Strategic Priorities

Enabling active and connected communities to own their future	Meeting the challenge of climate change through every means available	Ensuring a high quality drinking water supply that is safe and sustainable	Accelerating the momentum the city needs	Ensuring rates are affordable and sustainable
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Ensuring we get core business done while delivering on our Strategic Priorities and achieving our Community Outcomes

Engagement with the community and partners	Strategies, Plans and Partnerships	Long Term Plan and Annual Plan	Our service delivery approach	Monitoring and reporting on our progress
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1. Apologies / Ngā Whakapāha

At the close of the agenda no apologies had been received.

2. Declarations of Interest / Ngā Whakapuaki Aronga

Members are reminded of the need to be vigilant and to stand aside from decision making when a conflict arises between their role as an elected representative and any private or other external interest they might have.

3. Development Contributions Policy 2021 - Submissions Analysis

Reference / Te Tohutoro: 21/498741

Report of / Te Pou	Gavin Thomas, Principal Advisor Economic Policy
Matua:	gavin.thomas@ccc.govt.nz
General Manager /	Lynn McClelland Assistant Chief Executive Strategic Policy and
Pouwhakarae:	Performance

1. Purpose of the Report / Te Pūtake Pūrongo

- 1.1 The purpose of this report is provide summary information and analysis of submissions made on the draft Development Contributions Policy 2021 to elected members to inform their decisions regarding the final policy. This report has been written as a key component of the submissions process used by the Council for community consultation on new or reviewed policy documents.
- 1.2 The decisions in this report are likely to be of low to medium significance in relation to the Christchurch City Council's Significance and Engagement Policy. The level of significance was determined by consideration of the likely options the Council will have in terms of making changes to the draft policy as a result of submissions.

2. Proposed Officer Recommendations / Ngā Tūtohu

That the Hearings Panel:

- 2.1 Considers the results of the consultation process, which are appended to this report, and in doing so hears any submissions.
- 2.2 Receives the staff thematic analysis summary of submissions with staff recommendations (Attachment A).
- 2.3 Receives staff advice on three further changes to the development contributions policy (Attachment B). The matters raised are:
 - 2.3.1 A recommendation to include an additional "Inner City" catchment for the road network activity
 - 2.3.2 A recommendation to reinstate the definition of a "kitchen" omitted in error from the draft policy
 - 2.3.3 A recommendation to add a column in the schedule of assets for transportation activities that clearly shows the expected financial contribution from Waka Kotahi New Zealand Transport Agency
- 2.4 Receives more detailed staff advice on key proposals which submissions didn't provide a clear preference on. These matters are:
 - 2.4.1 Proposed Akaroa development contribution charges
 - 2.4.2 Proposed changes to the small residential unit adjustment provision of the policy
 - 2.4.3 Proposed changes to the assumed demand on infrastructure from a care bed suite at a retirement village – in response to a submission.
- 2.5 Reports the outcome of the hearings process and the submissions received to the Council for a decision on the final form and adoption of the Development Contributions Policy 2021.

3. Background / Te Horopaki

About the Development Contributions Policy

- 3.1 Christchurch City Council has had a Development Contributions Policy since 2004 with this being the ninth review of the policy over that time. The policy enables the Council to recover a fair share of the cost of providing infrastructure to service growth development from those who benefit from the provision of that infrastructure.
- 3.2 The Policy details the methodology used to establish development contribution charges per household unit equivalent, the cost of those charges, the methodology used to assess a development for the level of development contributions required and the various process requirements associated with operating a fair and consistent development contributions process.
- 3.3 The policy includes a schedule of assets listing the assets the Council has or intends to deliver to service growth development. It is these assets only that the Council can use development contributions to fund the growth component of assets.
- 3.4 The assets are in three main classes;
 - Reserves - parks and open space assets
 - Network infrastructure – water, wastewater and transport assets
 - Community infrastructure – facilities like pools, libraries, playgrounds and cemeteries

Development contributions revenue

- 3.5 In the 2019/20 year the Council received revenue of around \$32 million from development contributions. They are currently a significant contributor to the Council's overall revenue.
- 3.6 Development contribution charges are derived directly from the cost the Council incurs to provide infrastructure to service growth development. The revenue is used to pay down debt taken out to initially fund the investment in growth infrastructure.

Policy review process

- 3.7 The Development Contributions Policy has many discrete inputs, all of which must be reviewed as part of any Policy review process. These include population growth model, business growth model, transport growth model, capital expenditure programmes related to growth, interest and inflation rate forecasts and reviews of the numerous methodologies used as the basis for the calculation and assessment of development contributions.
- 3.8 In addition, this review process has included reviewing the use of catchments to calculate and assess development contributions.
- 3.9 This review has also been an opportunity to rigorously review the content and structure of the policy to improve clarity and legibility. This has resulted in significant change from the current policy.
- 3.10 The review has been overseen by a Steering Group and undertaken by a Working Group both comprised of relevant staff from across the Council. A key component of the review process has been the Working Group collectively analysing issues that have either been raised by developers or have become evident when using the current Policy to guide processes and decisions associated with development contributions.
- 3.11 Several workshops and briefings for councillors have been held over the past three years to ensure elected members have had the opportunity to effectively consider the full range of issues and options.

4. Community Views and Preferences / Ngā mariu ā-Hāpori

Public Consultation / Te Tukanga Kōrerorero

- 4.1 Public consultation on the draft policy ran in parallel with the Long Term Plan, from 12 March to 18 April 2021.
- 4.2 Consultation booklets with information about the draft policy changes, submission forms and the full draft policy were available in all council libraries and service centres.
- 4.3 People could make submissions on the council Have Your Say web pages.
- 4.4 Consultation and public drop-in sessions were advertised, across a range of media including facebook, print and through the Council 'Go Ahead' newsletter. An email was sent to stakeholders on 12 March.
- 4.5 Consultation documents and webpages for the Long Term Plan and Climate Change Strategy also linked to / referred to the draft policy consultation.
- 4.6 Two joint drop-in sessions were held at Tūranga on Tuesday 23 March and Wednesday 31 March. Approximately 20 people attended.

Summary of Submissions / Ngā Tāpaetanga

- 4.7 There were 34 submissions received on the draft development contributions policy 2021. A detailed thematic analysis of the submissions with staff responses is attached to this report – Attachment A.
- 4.8 This included 17 individuals and 17 organisations.
- 4.9 All submitters were from within the Christchurch rating area.
- 4.10 More detailed analysis on key proposals within the draft policy is attached – Attachment C.
- 4.11 Overall, there is strong and consistent support for development contributions being a fair way to fund growth infrastructure
- 4.12 Overall, submitters support most of the key proposals included in the consultation document. These include proposals to:
 - Increase the use of catchments as the basis for allocating the costs of infrastructure to service growth and for recovering the costs of providing this infrastructure through charging development contributions
 - Introduce a development contribution charge for community infrastructure
 - Require non-residential development to be assessed for development contributions for reserves activities
 - Introduce an “intensification” catchment for neighbourhood parks that covers the medium density and residential transitional zones of the District Plan and for development contributions from this catchment to fund park upgrades in areas experiencing infill development growth
- 4.13 Overall, there was consistent opposition from submitters to the proposal to extend the small residential unit adjustment to enable the adjustment to apply to residential units with a gross floor area of 35 square metres rather than the current smallest floor area of 60 square metres.
- 4.14 There were a small number of detailed submissions providing feedback, and often alternative policy proposals, on specific provisions of the policy.

5. Details / Te Whakamahuki

Decision Making Authority / Te Mana Whakatau

- 5.1 The Council has retained the authority to adopt a development contributions policy for itself. Recommendations from the Hearing Panel will be provided to the Council to inform its final decision-making and policy adoption.

Legal Implications / Ngā Hīraunga ā-Ture

- 5.2 The Local Government Act 2002 requires all territorial local authorities to have a policy on development contributions or financial contributions (section 102 (2(d)). Before adopting a development contributions policy the Council must consult on a draft policy in a manner that gives effect to the requirements of section 82 of the Local Government Act 2002.

Risks / Ngā Tūraru

- 5.3 Development contributions can be a litigious area of local government activity often with significant financial implications for developers and councils. Because of this there is a significant body of case law regarding what can and can't be done under the provisions of a development contributions policy.
- 5.4 Risk mitigation undertaken as part of the policy development process includes:
- Council's legal services team has provided advice throughout the policy development process including full review of the proposed policy
 - Monitoring of development contributions issues related to the implementation of the current policy as they arise and incorporating lessons learned in the Policy where appropriate
 - Monitoring of development contributions issues confronted by other councils and the methods used to resolve issues
 - Undertaking an internal audit of the Development Contributions Policy and processes to identify potential areas of risk and responding to these risks

Next Steps / Ngā Mahinga ā-muri

- 5.5 Following consideration of submissions the Hearing Panel will make recommendations to the Council regarding changes to the draft development contributions policy as a result of submissions received and any additional advice provided by staff.

Attachments / Ngā Tāpirihanga

No.	Title	Page
A ↓	Draft Development Contributions Policy 2021 - Submissions Analysis - Attachment A	12
B ↓	Development Contributions Policy 2021 - Attachment 2 - Staff Recommendations	66
C ↓	Development Contributions Policy 2021 - Attachment 3 - Further Analysis	71

Confirmation of Statutory Compliance / Te Whakatūturutanga ā-Ture

Compliance with Statutory Decision-making Requirements (ss 76 - 81 Local Government Act 2002).

(a) This report contains:

- (i) sufficient information about all reasonably practicable options identified and assessed in terms of their advantages and disadvantages; and
- (ii) adequate consideration of the views and preferences of affected and interested persons bearing in mind any proposed or previous community engagement.

(b) The information reflects the level of significance of the matters covered by the report, as determined in accordance with the Council's significance and engagement policy.

Signatories / Ngā Kaiwaitohu

Authors	Gavin Thomas - Principal Advisor Economic Policy Tessa Zant - Senior Engagement Advisor
Approved By	Emma Davis - Head of Strategic Policy Diane Brandish - Head of Financial Management Lynn McClelland - Assistant Chief Executive Strategic Policy and Performance

Attachment A

Thematic analysis of submissions to the draft Development Contributions Policy 2021

1. Policy direction and approach

1.1 Overall policy approach

9 submissions received

4 submitters suggest alternatives to proposed policy provisions

Support

Submitter	Submission	Staff comments
39064 Waipapa/ Papanui-Innes Community Board	The Board supports the draft policy in its entirety.	<i>Support is noted</i>
39419 Arthur McGregor	I support the changes proposed in this policy review.	<i>Support is noted</i>
39476 Waitai/Coastal- Burwood Community Board	The Waitai/Coastal-Burwood Community Board broadly support the Proposed Development Contributions Policy 2021.	<i>Support is noted</i>
39523 Tony Dale	I support the Development Contributions Policy as it stands. I support the general direction that the CCC is taking for development contributions.	<i>Support is noted</i>
39568 Finn Jackson	I support the proposed policy.	<i>Support is noted</i>

Alternative

Submitter	Submission	Staff comments
39553 Lyttelton Port Company Limited	<p>LPC does not support Policy Objective 2 of the Draft Policy in its current form. This Policy ‘to provide predictability and transparency regarding assets to be provided to service growth development and how those assets will be funded’. There is concern that the use of the words ‘will be’ within this objective lacks certainty and accountability regarding the actual spend of DC funds on projects. The tense suggests transparency will be provided around projected funding, as opposed to actual funding.</p> <p>Certainty of the actual spend of DC funds is expected by the Development Contributions Principles within Section 197AB the Local Government Act 2002 (LGA), specifically clauses:</p> <ul style="list-style-type: none"> (d) development contributions must be used— <ul style="list-style-type: none"> (i) for or towards the purpose of the activity or the group of activities for which the contributions were required; and (e) territorial authorities should make sufficient information available to demonstrate what development contributions are being used for and why they are being used’. <p>Notably Clause (e) of Section 197AB of the LGA uses ‘are’ (underlined above) as opposed to ‘will be’, as proposed by CCC.</p>	<p>Staff believe this change can be made without any risk to the integrity of the policy.</p> <p><i>Recommend the policy wording is changed as the submitter has requested</i></p>
	<p>LPC recognises that the Council does identify the actual contribution of DC funds for projects that are ‘Complete’ within the Draft Policy (Table A1.2). However, there are a significant number of projects within this table that are ‘In Progress’ or subject to the ‘LTP’ (Long Term Plan).</p> <p>It is requested that clear, easily accessible information regarding the final proportion of DC funding for these ‘In progress’ or ‘LTP’ projects is provided by Council. This provides accountability in accordance with Section 197AB(1)(d)(i) of the LGA.</p>	<p>The information regarding the proportion of DC funding for current and future projects can change to reflect changes in the capital programme, changes in forecast population and business growth, changes in assumed average demand on infrastructure as well as changes in other variable parameters associated with infrastructure management. The Local Government Act provides the flexibility for this to happen.</p>

Submitter	Submission	Staff comments
		<p>The information shown in the Policy and subsequent iterations of the policy is based on the best information available at the time.</p> <p>The Council complies with all requirements of the Local Government Act that relate to development contributions and how revenue from them is applied.</p> <p>Submission is noted Recommend no change to policy</p>
39553 Lyttelton Port Company Limited	<p>Development Contributions Policy objectives (from the full policy document):</p> <ul style="list-style-type: none"> Amendment requested: include “community facilities”. <ul style="list-style-type: none"> Change Objective 1.2.1 from: <ul style="list-style-type: none"> “To ensure developers contribute fairly to funding infrastructure and facilities to service growth development” to: “To ensure developers contribute facilities (including community facilities) to service growth development”. Change Objective 1.2.3 as for Objective 1.2.1, from: <ul style="list-style-type: none"> “To ensureoverall revenue mix that funds the provision of infrastructure and facilities (including community facilities) to service new development” to: “To ensureoverall revenue mix that funds the provision of infrastructure and facilities (including community facilities) to service new development”. <p>Rationale: Communities need community facilities such as libraries and recreational spaces just as much as they need roads and sewers. Unless developers contribute to the cost of providing these facilities, the cost falls on the ratepayer. This is well stated in section 1.3.2 Fairness and equity.</p>	<p>The Local Government Act has been changed to allow councils to require development contributions for a wider range of community infrastructure assets.</p> <p>The draft policy proposes the levying of development contributions for a range of assets including aquatic centres, sports halls, libraries and cemeteries.</p> <p>While agreeing with the sentiment expressed by the submitter, specific reference to community facilities is now redundant and may unnecessarily limit the broad intention of the objective as currently stated.</p> <p>Recommend no change to policy</p>

Submitter	Submission	Staff comments
39567 Halswell Residents Association (Inc.)	<p>We note that City Council is two years behind the three yearly review schedule required by the Local Government Act; the present review should have been carried out in 2019.</p> <ul style="list-style-type: none"> Having policy reviews running this late confirms to us that City Council's management systems are not fit for purpose. <p>As such, their deficiencies leave City Council open to the risk that central government will intervene, perhaps in the same way that central government intervened with Environment Canterbury.</p>	<p>This has been acknowledged throughout the review process. Staff have provided Council with advice relating to risk associated with this which has been assessed as being minimal.</p> <p>Submission is noted</p>
39553 Lyttelton Port Company Limited	<p>LPC encourage Christchurch City Council to regularly monitor, review and seek feedback on their Development Contributions Policy. This will be critical after the release of the adopted Development Contributions Policy and improve certainty and understanding for all developers.</p>	<p>The Council is required to review its development contributions policy at least every three years and to undertake community engagement as part of that process.</p> <p>Information is made available to submitters and developers in the Council's contact database at the completion of a policy review detailing key changes made to the policy and directing interested parties to the Council website for relevant information.</p> <p>The development contributions policy, and all past policies, is available on the Council website provides along with additional information and contact details for the Council's development contributions team if developers have any questions.</p> <p>The development contributions team can provide a preliminary assessment for any proposed development with the accuracy of the estimate dependent on the accuracy and</p>

Submitter	Submission	Staff comments
		detail of information able to be provided by the developer. Staff will engage with LPC to find out what their specific concerns are.

1.2 Is it fair that developers pay a share of the cost of providing infrastructure to support growth?

8 submissions received

All support it being fair that developers pay a share of the costs of providing infrastructure to support growth

No submissions were received disagreeing

Support

Submitter	Submission	Staff comments
38737 Connor McIver	It is absolutely fair that developers pay a contribution towards infrastructure to service growth. If ratepayers are expected to meet these costs there will always be a perverse incentive on Council to not allow any further development in Christchurch.	Support is noted
39064 Waipapa/ Papanui- Innes Community Board	It is fair that developers pay a share of the cost of providing infrastructure to service growth.	Support is noted
39488 Jennifer Porter	Owners of densification projects should definitely contribute to costs – the wear and tear of huge machines – diggers, concrete mixers, jack hammers to break existing concrete is taking a huge toll of road and pavement surfaces. The ageing water pipes and waste/storm water drains are also overloaded with the addition of 10 or more households where there was only one. Relaying such pipes should have happened before the development. As it is, new houses have	Support is noted The Council provides infrastructure to service growth development in the most cost-effective way possible that ensures development is not held up waiting for growth capacity.

Submitter	Submission	Staff comments
	nice new pipes and drains but the sheer volume cannot be accommodated by the ageing infrastructure. Another method of obtaining funds could be offering City Development shares to the public (not only local) to encourage private (including Mum & Dad investors) investment. Consider how much is raised by “give a little” projects. The advantage of share is the prospect of a return/dividend which would be more attractive than the current interest rate offered by banks.	The Council borrows from the Local Government Financing Agency to fund infrastructure investment. This is at rates lower than could be expected if done through a bond issue or similar. <i>Recommend no change to the policy</i>
39538 Waipuna/ Halswell Hornby Riccarton Community Board	The Board considers it fair that property developers pay a fair share of the cost of providing infrastructure that supports growth so that ratepayers are not overly burdened. Requiring developers to pay a contribution to the cost of provision of additional or new infrastructure necessitated by their development ensures that beneficiaries of the investment pay a fair share of the cost that would otherwise fall on the Council.	<i>Support is noted</i>
39574 Mike Currie	I believe that that developers should pay a fair share of the cost of providing infrastructure to service growth.	<i>Support is noted</i>
39553 Lyttelton Port Company Limited	LPC strongly support Policy Objective 1 of the Draft Policy. LPC recognise the need for development contributions and that providing additional infrastructure for a growing city comes at a cost. The Development Contributions process needs to ensure that developers contribute fairly to funding infrastructure and facilities to service growth development.	<i>Support is noted</i>
39567 Halswell Residents Association (Inc.)	Developers must contribute, as they garner profits from their developments. Unless some of this profit is returned to the Council by way of development contribution, the financial benefits flow to developers and costs go to the ratepayer.	<i>Support is noted</i>
39556 Christchurch International Airport Ltd.	Yes, it is fair that developers pay a share of the cost of providing infrastructure service growth.	<i>Support is noted</i>

Submitter	Submission	Staff comments
39555 Banks Peninsula Community Board	The Board believes that the real cost of establishing new infrastructure should be the onus of the developer, rather than the burden of the ratepayer. The Board understands that development contributions within Christchurch city will be lower than on Banks Peninsula, because the infrastructure to connect new dwellings already exists. Correspondingly, many places on Banks Peninsula require new or remarkably improved infrastructure, which results in substantially higher development costs such as those proposed for Akaroa Harbour.	Support is noted

1.3 Are there alternative ways to fund growth infrastructure that the Council should use instead?

7 submissions received, all suggesting alternatives

Submitter	Submission	Staff comments
39568 Finn Jackson	If anything I would like to see development contributions reduced further for higher density infill developments and increased for greenfield development, but I don't know enough to comment further at this time.	Development contribution charges are derived directly from the costs Council incurs to provide infrastructure for growth. Using catchments to allocate this cost based on benefit received has resulted in a more equitable and transparent allocation of costs and benefits. Recommend no change to policy
39523 Tony Dale	I hope that CCC politicians will continue to lobby for central government funding of infrastructure for Christchurch.	The funding of infrastructure is to be included in the work being undertaken by the government through the "Future of Local Government" review process. The Council is expected to be an active participant in this. Submission is noted

Submitter	Submission	Staff comments
38737 Connor McIver	Alternative way of funding infrastructure: it would be good if the GST from construction went to the local government for infrastructure rather than central but of course this is not something that Council can control.	The funding of infrastructure is to be included in the work being undertaken by the government through the “Future of Local Government” review process. The Council is expected to be an active participant in this. Submission is noted Recommend no change to policy
39515 Peter Scholes	A new development charge should apply starting at 10 times the rates for all un-developed land.	The Local Government Act prescribes how development contributions are calculated. This is based on recovery of actual and planned costs of providing infrastructure rather than being an arbitrary development tax. The submitter may wish to lobby central government for a change to the statutory basis for calculating DCs. Recommend no change to policy
39556 Christchurch International Airport Ltd.	However, a more equitable method to determine development contributors based on a detailed assessment of ‘the use of’/or impact to’ infrastructure of the development is more appropriate than the current m2 rate. It should be transparent and clearly articulated how the calculation has been made.	The calculation for determining demand based on a square metre rate is provided in the Appendix 4 of the Policy. Staff are in the process of reviewing the way in which an assessment summary is presented to customers. Recommend no change to policy
39567 Halswell Residents Association (Inc.)	Council could cut private developers out of the process by doing all the development itself. This would ensure that both financial costs and benefits of new developments would go to the wider community. We doubt that this alternative would be politically palatable.	This could be considered by the Council outside of the development contributions policy and framework, but development work is not generally a core Council activity. Submission is noted

Submitter	Submission	Staff comments
39574 Mike Currie	<p>There are alternative ways to fund growth infrastructure such as privatising but I consider this to be very risky. The Christchurch City Council Draft Long Term Plan 2021–31 is proposing an Excess Water Use Targeted Rate for Households. I support this because I see the charge as not being for water but for the infrastructure needed to provide the water. The volume of water used is simply a measure of the use of that infrastructure, provided that money is used for the water infrastructure and not as a fundraiser to be siphoned to other infrastructural or other areas of expenditure. It's important to understand that water infrastructure is expensive and the more water we use the more likely it is we will need larger pipes to carry the water, additional water reservoirs, additional water pump station upgrades, additional land to dispose wastewater to and so on...</p> <p>A charge for water use above 700l/day/household incentivises people to reduce water use (or put in alternative systems for irrigation), reducing the overall cost to the ratepayers. From my point of view, it's fair in that those who drive the need for additional infrastructure pay a greater contribution to the cost of that infrastructure.</p> <p>However, alongside the excess water charge Council should be educating around the importance of conserving water, and best use in terms of rainwater/greywater collection.</p> <p>With respect to rain water tanks, all new housing should include rain water tanks and subsidies be made available for existing housing to incorporate rain water tanks. Refer to supporting document "Regulating for supplementary water supply (rainwater tanks)" produced by the Canterbury Sustainable Homes Working Party. This will help reduce the load on the Christchurch City drinking water supply and infrastructure.</p> <p>The Water Services Bill is about to go through its second reading. Between this Bill and the formation of Taumata Arawai (the enforcement agency) we are</p>	<p>The Council looks to have development contributions revenue fund the provision of infrastructure to service growth development.</p> <p>Revenue from an excess water use targeted rate would not be used instead of development contributions to fund infrastructure to service growth development. The targeted rate revenue is used to fund specific expenditure related to the delivery of water supply services.</p> <p>A requirement for new housing to include water tanks would be a matter for the Building Code and/or the District Plan to address.</p> <p>The funding of 3 Waters infrastructure and services is dealt with through the Long Term Plan.</p> <p>Matters relevant to the establishment of a regional service provider are to be addressed through a separate process. This will include the levying of development contributions or an alternative growth charge along with how development contributions revenue is allocated.</p> <p>Submission is noted Recommend no change to policy</p>

Submitter	Submission	Staff comments
	<p>going to see the costs of Three Waters provision increase. In addition to that we have the Government proposing the creation of regional entities that will take over the management of Three Waters infrastructure unless councils decide to 'opt out'.</p> <p>With the cost of running these systems set to increase but councils' debt limits remaining where they are, local councils are facing a dilemma. Unless they can find a way to fund the ongoing provision of Three Waters infrastructure to a standard that meets the requirements of the proposed Water Services Bill (and any additional requirements of Taumata Arawai), they will be unable to 'opt out' of the entity model.</p>	

2. Use of catchments to calculate development contributions

2.1 Should we use catchments to calculate development contributions or take a district-wide approach?

22 submissions received

10 submissions in support of proposals

1 submission in opposition

11 submissions propose alternatives

Support

Submitter	Submission	Staff comments
38737 Connor McIver	I support a catchment approach rather than a district-wide approach. It is not fair for developments outside of the city to be subsidised by those in the city. It is also not helpful in the overall goal of living more sustainably, subsidies for these properties will just encourage urban sprawl. Catchments should not be subject to a cap, someone has to pay and it is fair that it falls to the developers in those locations.	Support is noted

Submitter	Submission	Staff comments
39064 Waipapa/ Papanui- Innes Community Board	The use of catchments in the proposed policy is a more fair and equitable way of collecting Development Contributions and the Board recommends that the Council proceeds with this.	<i>Support is noted</i>
39419 Arthur McGregor	I think that calculating by catchments is a fair approach, and smaller communities and greenfield developments should pay high development contributions. We need to be encouraging more infill development to reduce urban sprawl, and the associated climate change implications, so I do not think there should be any caps for smaller settlements or rural areas. The development contribution should reflect the actual costs as much as possible and should not be subsidised by developments in the city.	<i>Support is noted</i>
39538 Waipuna/ Halswell Hornby Riccarton Community Board	The Board notes that under current policy development contributions are calculated at a catchment level for road transport, neighbourhood parks and stormwater and flood protection and that the Policy proposes to extend the use of catchments for Water supply, Wastewater collection, Wastewater treatment and disposal, and Public and active transport. The Board supports the use of catchments as proposed as it considers that this ensures the development contributions charged are aligned to the cost of providing infrastructure to service growth in each part of the district so that the beneficiaries of the services are paying for it.	<i>Support is noted</i>
39574 Mike Currie	I believe Council should use catchments to calculate the development contributions charges rather than a district-wide approach.	<i>Support is noted</i>
39555 Banks Peninsula Community Board	the Board supports the use of catchments to calculate development contributions, including the proposed infrastructure types of water supply, wastewater collection, wastewater treatment and disposal, as well as public and active transport.	<i>Support is noted</i>

Submitter	Submission	Staff comments
39567 Halswell Residents Association (Inc.)	<p>a. We support the use of catchments, otherwise the cost of otherwise unsustainable developments is subsidised.</p> <p>b. Subdivision development is not a “community good” in the way that a new library or pool is a community good. The people who benefit from a particular development are (in the first instance) the developer through the profit made, and (in the second instance) the people who choose to live in the development.</p> <p>As a general principle, we think that development contributions collected in a particular area should largely be spent in that area.</p> <ul style="list-style-type: none"> • If development contributions are simply used for city-wide projects, the city comes to depend economically on continued urban sprawl. • Similarly, existing residents are essentially taxing new residents for the “privilege” of living in Christchurch, whether or not new residents predominate in and new developments. <p>The obvious exceptions to this principle comprise metro level projects such as (the now complete) Tūranga, and the yet to be completed Christchurch stadium, and expansions of waste water treatment capacity.</p>	<p>Support is noted</p> <p>Development contributions fund infrastructure to service a growth development which may or may not be located in the catchment a particular development is in.</p> <p>Limiting the use of revenue in the way suggested would mean a significant proportion of infrastructure to service growth wouldn't be funded from development contributions.</p> <p>Recommend no change to the policy</p>
39473 University of Canterbury	University of Canterbury support the ‘catchment’ based approach for these services. This approach represents a more fair and equitable charge and avoids a ‘subsidy’ charge scenario that a district wide approach can result in.	Support is noted
39538 Waipuna/ Halswell Hornby Riccarton Community Board	The Board supports the use of development contributions to recover the costs of providing future growth capacity for facilities such as swimming pools, sports centres, libraries and cemeteries, noting that this reverts to the situation that applied prior to 2014.	Support is noted

Oppose

Submitter	Submission	Staff comments
39571 Jan Cook	<p>I support a district wide catchment for wastewater and water supply.</p> <p>The proposal to charge \$70,000 to new developments around Akaroa Harbour, because of the cost of water and wastewater infrastructure, is iniquitous and inconsistent with the stated reasons for the policy.</p> <p>1.3.2 Current residents have made a considerable investment in the existing infrastructure.... It is appropriate that additional or new infrastructure required to service growth requirements should be funded primarily by those who benefit from it.</p> <p>Capital expenditure incurred for reasons other than to provide for growth is funded from rates rather than development contributions.</p> <p>I have been closely involved with the progress of the proposed upgrades to the Akaroa and Duvauchelle wastewater systems for many years. A new treatment plant for Akaroa is necessary because of a long-standing promise to move the treatment plant from its current culturally offensive location at Takapuneke, and new disposal systems because of environmental and cultural concerns about the discharge of treated wastewater to Akaroa Harbour.</p> <p>Akaroa's old, damaged and leaking sewer pipe network needs comprehensive repair, due to old age, earthquake damage and many years of neglect. Water supply shortage is principally due to reliance on stream supplies, which are affected by the increasing severity of droughts.</p> <p>The Council's 'Have your say' document states (page 3) - We have significantly invested in upgrading water and wastewater infrastructure in Akaroa Harbour communities to bring services up to an appropriate standard.</p>	<p><i>Preference is noted</i> <i>Recommend no change to policy</i></p> <p>Only the growth component of the water supply and wastewater projects were considered for development contributions. The reason for the high charges is partly because of the low expected growth and the subsequent high unit cost for providing growth capacity. Capacity backlog, renewals and costs related to increased standards have been explicitly excluded from the development contribution calculation.</p> <p><i>Specific analysis on this issue will be provided to councillors – Attachment C.</i></p>

Submitter	Submission	Staff comments
	<p>The new wastewater systems are needed, not because of growth demand, but because of the need to meet current environmental standards. In recognising Ngai Tahu cultural wishes, there are wide public benefits, beyond the serviced properties, from the planned new treatment plants.</p> <p>Clearly current residents have NOT made considerable investment in the new wastewater infrastructure - it will be funded from borrowing, with the cost of this being met from the general rate. New developments will pay via future rates in the same way as existing properties.</p> <p>The proposed development contribution for Akaroa Harbour would ensure that lower cost, affordable housing would not be built in our area.</p>	

Alternative

Submitter	Submission	Staff comments
39488 Jennifer Porter	Catchments are confusing! The maps show that one place could be in several different catchments – for water supply & treatment, parks, roads etc.	<p>Staff acknowledge that the maps provided in the draft development contributions policy need to be clearer and this will be undertaken for the final policy.</p> <p>In future we will endeavour to provide catchments proposed in a draft policy online to enable more accurate scrutiny by potential submitters.</p> <p><i>Catchments are and will be available online when the policy is adopted.</i></p>

Submitter	Submission	Staff comments
		<i>The catchment maps in the final policy will be refined to improve clarity.</i>
39515 Peter Scholes	<p>As Hornby / Hei Hei / Sockburn have no cycle-way can we please be excepted from the active travel rate.</p> <p>The things about Moncks Bay and main Road development should be payed for by the people in the area, because the benefits to greater Christchurch is small to nil. Also, by paying for it the community will own it and keep it safe.</p> <p>Main South Road needs some improvements both to the road surface and landscape, between Spring Road and Hornby Mall. Because most of Christchurch use this road and benefit from it all of Christchurch should pay for this improvement.</p> <p>I have a feeling with the "beneficiary should pay principle" that Hornby and Hei Hei's community will have to pay the cost for there new pool and service centre by them self and still contribute to Halswell's and Riccarton's service centre and pool.</p>	<p>Major Cycle Routes are being developed to connect the city up including Sockburn and Hei Hei.</p> <p>The Southern Express Major Cycle Route as well as associated connections will provide a high level of active travel provision for the Hornby/Hei Hei/Sockburn area over the course of the LTP.</p> <p>The Major Cycle Routes and the local cycleways are connected and form a network across the whole city and the cost is therefore spread and charged on a district wide basis.</p> <p>The development contributions for community infrastructure (including the Hornby service centre and pool) are levied on a district-wide basis.</p> <p><i>Recommend no change to the policy</i></p>
39567 Halswell Residents Association (Inc.)	<ul style="list-style-type: none"> Although we see the logic of a Christchurch metropolitan charge for public transport, this assumes that new developments are structured so that they have access to public transport and active transport. Public transport has \$960.15 proposed (and \$717.60 currently), yet there is virtually no access to public transport in these areas of Halswell. Similarly, there is no easy access to active transport infrastructure such as cycleways in the new areas of Halswell. <ul style="list-style-type: none"> In the current LTP consultation, we are requesting the addition of active transport connections to new subdivisions along the eastern and southern margins of Halswell. 	<p>There are a number of bus routes currently serving the Halswell area. Lincoln Road/ Halswell Road is identified as a key Public Transport corridor with a number of capital projects planned and being delivered along it.</p> <p>These include, but are not limited to:</p> <ul style="list-style-type: none"> Lincoln Road Passenger Transport Improvements between Curletts and Wrights

Submitter	Submission	Staff comments
	Given the provisions and wording of the Development Contributions Policy review, we are confident that our requests will be adopted.	<ul style="list-style-type: none"> Core PT Route & Facilities: South-West Lincoln Road Lincoln Road PT Priority - Whiteleigh to Wrights. <p>Public transport funding is being increased as a result of the endorsement of the “Public Transport Futures Business Case” by the Council in early 2021. The programme recommends a considerable investment in public transport infrastructure and services in line with the Council’s broad environmental strategies.</p> <p>The work programme and budget in the draft LTP 2021 -31 includes the Quarryman’s Trail Major Cycleway and local cycleway connections off the trail are being built on Sparks Road, and beyond.</p> <p>Also the Southern Motorway Major Cycleway and local connections forms the basis of the safe off-road cycle connections into Halswell.</p> <p><i>Recommend no change to the policy</i></p>
39455 Vicki Brown	Developer contributions should be spent back directly to amenity of the suburb they were paid for. Residents have to put up with the construction noise, vibration, sometimes the aggression and blind sidedness of the CCC issuing non notifiable consents with less than minor issues just to get them through with no consideration of the community they are approving in and the amenity that is not put back in further frustrates an already heated environment.	<p>Development contributions fund infrastructure to service a growth development which may or may not be located in the catchment a particular development is in.</p> <p>Limiting the use of revenue in the way suggested would mean a significant</p>

Submitter	Submission	Staff comments
		<p>proportion of infrastructure to service growth wouldn't be funded from development contributions.</p> <p><i>Recommend no change to the policy</i></p>
39553 Lyttelton Port Company Limited	<p>LPC oppose the proposed increase in the 'Active Travel' charge for Lyttelton. Based on the information released by Council for feedback, the proposed 'Active Travel' charge for 1 Household Unit Equivalent (HUE) in Lyttelton is expected to increase from \$425.50 to \$2,759.70.</p> <p>This increase in the 'Active Travel' charge appears to be due to the change from one district-wide catchment to one Christchurch metropolitan catchment ('the Metro Zone'), within which Lyttelton is included (Figure 1).</p> <p>The grounds for this objection are as follows: a. Firstly, there are no 'Active Travel' projects within Table A1.28 of Draft Policy that are located within Lyttelton. The list of 'Public Transport' projects also do not appear to specifically relate to Lyttelton.</p> <p>Section 197AB(d)(ii) of the Local Government Act 2002 requires that development contributions must be used for the benefit of the district or the part of the district that is identified in the development contributions policy in which the development contributions were required.</p> <p>b. Secondly, the inclusion of Lyttelton within the 'Metro Zone' (Figure 1) results in Lyttelton development being charged for 'Active Travel' infrastructure on the other side of the Port Hills which they have more limited access to.</p> <p>It contrasts with the classification of Lyttelton within the remainder of the DC Policy, where it is recognised within its own sub-catchment for all other Development Contribution charges. The exception to this is 'Neighbourhood Parks' where Lyttelton is included in the 'Banks Peninsula' sub-catchment.</p>	<p>Lyttelton has always been in the suburban transport catchment for Christchurch as it is serviced by Active and Public transport.</p> <p>Travellers cycle to the Diamond Harbour Ferry and Lyttelton Residents cycle to the Lyttelton Bus which carries three cycle racks to cater for the demand.</p> <p>The metropolitan catchment covers all the bus routes which is the focus of public transport long term plan.</p>

Submitter	Submission	Staff comments
	<p>c. Thirdly, the other transport-related DC Charge for 'Road Network' places Lyttelton within the 'Lyttelton Harbour' sub-catchment.</p> <p>The Road Network charges applying to the Lyttelton Harbour, Akaroa and Banks Peninsula sub-catchments are less than the Road Network charges applying to Christchurch City sub-catchments (i.e. Central and Suburban).</p> <p>There is a clear distinction made in this respect, which contrasts with the inclusion of Lyttelton within the 'Metro Zone' for 'Active Travel' and 'Public Transport'.</p> <p>Based on these matters, LPC questions whether it is appropriate to include Lyttelton within this 'Metro Zone' or whether further distinction is necessary.</p>	
39574 Mike Currie	<p>Active travel includes footpaths and cycle ways. I am not sure that I agree that that areas outside the city are not charged a development contribution for active travel, footpaths and cycle ways will be required whether or not the area is inside or outside the city. The only reason for not providing development contribution for active travel for areas outside the city would be if footpaths and cycle ways are not provided in these areas.</p> <p>With the exception of:</p> <ul style="list-style-type: none"> - Halswell wastewater, storm water and flood protection - Belfast storm water and flood protection - Lyttelton water supply - Akaroa water supply, wastewater collection, treatment and disposal <p>there is a significant drop in the Development Contribution charge for the Three Waters (water supply, wastewater and storm water infrastructure). Given my comments above on the pending impact of the Water Services Bill, I am very</p>	<p>If active travel and cycleways are provided in areas outside the metropolitan city boundary then a development contribution would be levied for the areas serviced.</p> <p>Footpaths within a development footprint are provided by the developer as a condition of resource consent.</p> <p>Costs incurred to increase the level of service provided cannot be funded from development contributions. Investment of this type will be funded in the first instance from borrowing</p>

Submitter	Submission	Staff comments
	concerned that Development Contributions are both fixed at a level high enough to fund the additional costs of providing infrastructure to such a level as to meet the Water Services Bill	which would be repaid from rates and/ or water charges. Recommend no change to the policy
39556 Christchurch International Airport Ltd.	Catchments are appropriate if they are structured accurately and reflect the current infrastructure and future demands on council owned and managed infrastructure. A catchment approach enables development contributions to be accurately focused and provide a fair apportionment of infrastructure costs. CIAL would like to understand inputs into the catchment categories and welcomes engagement from CCC on the identification of CIAL landholdings within these catchments. CIAL would like to engage with CCC on the identification of CIAL landholdings within this mapping suite.	Staff will arrange to meet with CIAL to discuss catchment configurations with respect to CIAL properties. Recommend no change to the policy
39558 Davie Lovell-Smith Ltd	In addition to the above it is noted that the plans of the new catchments made available by Council are of such a poor quality and scale that it is impossible to identify exactly where these boundaries may fall. Whilst it is acknowledged that the online look-up tool will eventually provide greater detail, it is difficult for parties to identify whether or not their property falls within a particular catchment. These means that it is has been difficult to ascertain the true impact of the changes to the catchments being proposed.	Staff acknowledge that the maps provided in the draft development contributions policy need to be clearer and this will be undertaken for the final policy. In future we will endeavour to provide catchments proposed in a draft policy online to enable more accurate scrutiny by potential submitters. The catchment maps in the final policy will be refined to improve clarity. Catchments are and will be available online when the policy is adopted.
39558 Davie Lovell-Smith Ltd	Some of the catchment maps in Appendix 2 are of a scale that make it difficult to ascertain what catchment applies to particular properties, in particular the	Staff acknowledge that the maps provided in the draft development contributions policy

Submitter	Submission	Staff comments
	Water Supply, Wastewater Collection, Stormwater and Neighbourhood Parks catchment Maps	<p>need to be clearer and this will be undertaken for the final policy.</p> <p>In future we will endeavour to provide catchments proposed in a draft policy online to enable more accurate scrutiny by potential submitters.</p> <p><i>The catchment maps in the final policy will be refined to improve clarity.</i> <i>Catchments are and will be available online when the policy is adopted.</i></p>
39571 Jan Cook	<p>The Board notes that the Development Contribution is lowered for central city and medium density development and notes that this contribution is at the same level.</p> <p>The Board suggests that the development contribution level for suburban medium density be higher than for the central city.</p> <p>If Council is serious about creating a vibrant central city, it needs to encourage residential development there. If it equalises the payment with medium density in the suburbs, e.g. Riccarton Hornby Linwood etc. it will defeat the goal of creating a vibrant central city residential development, as developers tend to go to medium density in the suburbs rather than provide units in the central city. It is easier and cheaper.</p>	<p>The development contribution charges for each catchment are based on the Council's capital expenditure to service growth development in each catchment.</p> <p>The policy cannot shift costs between catchments to achieve strategic goals.</p> <p>The Council operates a development contributions rebate scheme for residential development in the central city to incentivise development through having a differential in costs between the central city and other locations.</p>

Submitter	Submission	Staff comments
		<p>If the Council wants to maintain this differential it should continue to do this via a rebate scheme.</p> <p><i>Recommend no change to the policy</i></p>
39587 Greater Hornby Residents Association	You are pleased with the direction of medium density catchment areas where infill DC's are made in your suburb but want the money being collected to be spent in your suburb for increasing amenity value for affected residents. The risk with the proposed direction is it is too wide and not macro enough to be of benefit to the residents who are affected by infill developments.	<p>Not all infrastructure required to service growth development is located in the catchment causing the demand for that infrastructure. This means it is not possible to retain all DC revenue within the catchment it has been taken from.</p> <p>The catchment configuration needs to balance the accurate allocation of cost of infrastructure with efficiency and efficacy. Micro-catchments are not workable.</p> <p><i>Recommend no change to the policy</i></p>

2.2 If we use catchments to calculate development contributions do you think a maximum charge or cap should apply?

6 submissions received – all oppose a maximum charge or cap

Oppose

Submitter	Submission	Staff comments
39538 Waipuna/ Halswell Hornby Riccarton	The Board therefore does not support the use of a cap to keep development contribution charges in smaller communities lower.	<i>Submission points noted</i>

Submitter	Submission	Staff comments
Community Board		
39419 Arthur McGregor	We need to be encouraging more infill development to reduce urban sprawl, and the associated climate change implications, so I do not think there should be any caps for smaller settlements or rural areas. The development contribution should reflect the actual costs as much as possible and should not be subsidised by developments in the city.	<i>Submission points noted</i>
39574 Mike Currie	Developments outside the city should not be subsidised by developments in the city. I do not believe that a maximum charge or cap should be applied to keep development contribution charges in smaller communities lower.	<i>Submission points noted</i>
39555 Banks Peninsula Community Board	While some may see higher development contributions as a disadvantageous deterrent for development, the Board believes that this is actually advantageous; higher charges will restrict growth from happening too fast and causing strains on existing infrastructure. Therefore, the Board supports the proposed household unit equivalents in this consultation. However, future increases should be reconsidered with regard to whether a maximum charge or cap would be appropriate.	<i>Submission points noted</i>
39567 Halswell Residents Association (Inc.)	<ul style="list-style-type: none"> a. No. We do not see why developers in (say) Halswell should contribute to the cost for developers in (say) Akaroa. b. The city-wide approach would be fine if development costs were approximately uniform. This will not be the case; an example in Halswell ward would be Redmond's Spur vs Country Palms. c. Finally, the urban area of Christchurch has been pumping money into Banks Peninsula ever since Christchurch City merged with Banks Peninsula, and such a proposal would make the flow even larger. (As a side recommendation, we suggest that Banks Peninsula be sold to Selwyn District Council for \$1.) <ul style="list-style-type: none"> a. No. Development in "smaller communities" is essentially an incentive for more development on Banks Peninsula. 	<i>Submission points noted</i>

Submitter	Submission	Staff comments
	<ul style="list-style-type: none"> b. Such development will inevitably have a larger carbon footprint (because of people commuting to and from Christchurch). c. Furthermore, there is a strong theme in the international planning literature showing that development inevitably adversely affects biodiversity. More development on Banks Peninsula means more adverse effects on biodiversity over a wider area. a. Development contributions in rural areas should not be capped. They tend to be of a smaller population density (lower HUE/ha), and contribute to distributing the human footprint over a wider area. 	
39588 Marga Lamoreaux	I support the increase of development contributions provided the money goes back into the infrastructure in the area where the development is.	<p>Not all infrastructure required to service growth development is located in the catchment causing the demand for that infrastructure. This means it is not possible to retain all DC revenue within the catchment it has been taken from.</p> <p><i>Recommend no change to the policy</i></p>

3. Development contributions for business developments

3.1 Should business developments be charged development contributions for community infrastructure?

8 submissions received

7 submissions in favour

1 submission opposes

Support

Submitter	Submission	Staff comments
38737 Connor McIver	Also, business developments should contribute too.	<i>Submission points noted</i>
39515 Peter Scholes	The differential between residential and business should be increased. There is no cost to business as rates are a taxable expense.	Development contributions cannot be levied on the basis suggested. Also it is not correct that development contributions are not a net cost to business developers. While there may be tax implications these are likely to vary by development. <i>Recommend no change to the policy</i>
39538 Waipuna/ Halswell Hornby Riccarton Community Board	The Board further supports the proposal that business developments are assessed for development contributions for community infrastructure as well as residential developments. The Board considers that this is appropriate given that community facilities are frequently used by the employees of businesses who may not live in the area.	<i>Support is noted</i>
39572 Phillipstown Community	The Phillipstown Community Centre Charitable Trust (PCCCT) supports the proposal for allocation of development contributions for community infrastructure from both new business and residential developments.	<i>Support is noted</i>

Submitter	Submission	Staff comments
Centre Charitable Trust		
39574 Mike Currie	I believe Council should charge development contributions for the cost of future-proofing community facilities and that business developments should be required to pay development contributions for community facilities such as swimming pools and libraries.	Submission points noted
39582 Marie Byrne	I support the allocation of development contributions towards community facilities and infrastructure, including allocation of contributions from business developments.	Support is noted
39567 Halswell Residents Association (Inc.)	Yes. Business is an inextricable part of the community, depending for its success on a vibrant and resilient wider community.	Support is noted

Oppose

Submitter	Submission	Staff comments
39473 University of Canterbury	<p>It is our understanding that under this proposed change UC will be charge 1 HUE for a development regardless of size/scale. So for example, a new 1000m2 build would result in 1 HUE in total, so \$851.81.</p> <p>If this is the case, the financial impact is minimal. However we do think the relationship to staff and businesses placing demands on Community Infrastructure is tenuous.</p> <p>Community Infrastructure includes Cemeteries, Playgrounds, Public Toilets, Aquatic Centres and Sport Halls. The proposed changes will now include libraries within that definition. It would be impossible to understand how</p>	<p>The policy and the consultation document explained that assessing the impact on demand for community infrastructure from business development is problematic which is why all are assumed to place additional demand equal to 1 Household Unit Equivalent (HUE).</p> <p>Staff believe this assumption is reasonable and is sufficient basis to levy a development contribution on business developments as proposed.</p>

Submitter	Submission	Staff comments
	much demand staff or students put on external facilities, and as such, no evidence to support the approach.	<i>Recommend no change to policy</i>

3.2 Should business developments be charged development contributions for reserves?

9 submissions received

6 submissions in favour of business being charged development contributions

2 submissions oppose

1 submission suggests an alternative

Support

Submitter	Submission	Staff comments
38737 Connor McIver	Yes, business developments should be required to pay for reserve infrastructure.	<i>Support is noted</i>
39488 Jennifer Porter	Businesses should contribute to parks as they benefit from green, breathing surrounds for work, travel to and from home, and leisure.	<i>Support is noted</i>
39538 Waipuna/ Halswell Hornby Riccarton Community Board	The Board agrees with the proposal that non-residential developments be required to pay development contributions for reserve infrastructure as it is likely business development will place some demand on reserves. The Board accepts that given the difficulty in accurately assess this demand it is appropriate for business developments to be assessed as being one household unit equivalent for each development.	<i>Support is noted</i>
39574 Mike Currie	I also believe that business developments should be required to pay development contributions for reserve infrastructure.	<i>Support is noted</i>

Submitter	Submission	Staff comments
39555 Banks Peninsula Community Board	The Board believes that reserve infrastructure should be included in business development contributions, not only because business development will place additional demand on reserves, but also because we must continue to support green spaces in our city to combat our climate and ecological crises.	Support is noted
39567 Halswell Residents Association (Inc.)	Yes. Business is an inextricable part of the community, depending for its success on a vibrant and resilient wider community.	Support is noted

Oppose

Submitter	Submission	Staff comments
39590 Rod Donald Banks Peninsula Trust	We suggest that assessing all non-residential activities as 1 HUE regardless of scale or land-use is inappropriate – non-residential activities should need to contribute based on their impacts or likely impacts and demands on services	It is problematic assessing the impacts on demand for reserves infrastructure for each individual business as this will vary by business and over time. Using an assumed demand of 1 Household Unit Equivalent is considered to be a reasonable and efficient approach to assessing demand on reserves assets from business developments. Recommend no change to the policy
39473 University of Canterbury	It is our understanding that under this proposed change UC will be charge 1 HUE for a development regardless of size/scale. So for example, a new 1000m2 build would result in 1 HUE in total, so \$1,393.33 (assuming UC is within the Suburban catchment for Neighbourhood Parks). If this is the case, the financial impact is minimal. However we do think the relationship to staff and businesses placing demands on Reserves is tenuous.	It is acknowledged that the University of Canterbury provides a “park like setting” but this is not public reserve space and it is unlikely that all staff and students would limit their use of reserve lands to those owned by the university.

Submitter	Submission	Staff comments
	UC campus has a park like setting that contributes to the open space offering in the north west of the city and Ilam fields is used by the public. It would be impossible to understand how much demand staff or students put on external reserves, and as such, no evidence to support the approach.	The policy and the consultation document explain that assessing the impact on demand for community infrastructure from business development is problematic which is why all are assumed to place additional demand equal to 1 Household Unit Equivalent (HUE). Staff believe this assumption is reasonable and is sufficient basis to levy a development contribution on business developments as proposed. <i>Recommend no change to the policy</i>

Alternative

Submitter	Submission	Staff comments
39515 Peter Scholes	The differential between residential and business should be increased. There is no cost to business as rates are a taxable expense.	The Council is not able to levy development contributions on an arbitrary basis as is suggested here. <i>Recommend no change to the policy</i>

4. Neighbourhood Parks in infill areas

4.1 Do you think development contributions are an appropriate way to fund improved neighbourhood parks facilities in residential areas experiencing growth development?

5 submissions received expressing a range of views

Support

Submitter	Submission	Staff comments
39591 Hayley Guglietta	I live in Richmond and I am concerned that the CCC is collecting developer contributions but not delivering civic resources to meet the growing population density and at the same time not collecting developer contributions from the social housing providers, both of which are putting strain on our resources, parks, community development organisations and facilities or lack of. None of our parks have had significant upgrades, Richmond Park has portacom alongside old broken toilets, Avebury Park has been without play equipment in spots until just recently, there is money being spent currently for staff to be paid to come up with a design no one wants yet no money to pay for these changes, what is the point? Richmond Green has no toilets and Avebury Heritage park does not have a sensible way to water the lawn yet at the same time make it difficult for a community group to use the precious lawn (double Standard) An enthusiastic group of local kids pitched to the council Staff how they could enliven the old bowling green beside the park and make the whole park user friendly for all ages, for this to progress it will be reliant on volunteers already stretched for capacity now that the Parks community partnership funding has been cut. The ORAC parks development money has been pushed out to 2024 in the LTP if this can't be moved forward perhaps for at least the Richmond part of the ORAC some of the DC's collected could go towards collaborating with the 30 plus groups in the Riverlution collective to get this important park of the green spine underway. I am not even going to wade into the issues around 10 Shirley Road.	<p>Social housing developed by Kāinga Ora and CCC don't qualify for a social housing rebate – so do pay development contributions.</p> <p>The draft policy includes an “intensification” catchment for the Neighbourhood Parks activity that covers the medium density and residential transition zones of the District Plan where most infill development is occurring. This will enable investment in improving parks assets to be better cater for infill growth in these area to be funded in part or whole from development contributions.</p> <p>Work is being undertaken by Council to explore how other activities might be able to better provide for increased intensification through work funded in part from development contributions and/ or financial contributions. This could include improving streetscape amenity/ tree canopy cover.</p>

Submitter	Submission	Staff comments
	<p>Richmond and other inner city suburbs have been systematically stripped of their amenity by central and local govt, subjected to below standard (by your own reports) infill housing by developers who have no community spirit and do not care about the communities they are lining their pockets in. You are collecting these contributions and not putting the investment back where it is needed.</p> <p>Most concerning shouldn't the contributions from the more dense areas such as Richmond go towards a program of work that reinvests into those communities rather than into growth in Greenfields or other less dense areas, we have just called a climate change emergency, not to mention we have a goal for so many people living in the city this won't be achieved if there is no amenity to attract them.</p>	<p><i>Recommend the work being undertaken by the Council with respect to investigating approaches to improve amenity in medium density growth areas of the city is noted.</i></p> <p><i>Recommend no change to the policy at this time</i></p>
39598 Don Gould	<p>My family owns property in Mairehau and Richmond. One area has a very large state housing estate while the other has been zoned for intensification.</p> <p>MY CONCERNS</p> <p>In Mairehau infrastructure is only supported by rates as there is little development which attracts contributions. It concerns me that the limited development in the area impacts civic asset development.</p> <p>In Richmond we have an many new builds and civic assets are not keeping pace, roads, community resources, water, sewer have all lagged.</p> <p>Recently I was sent a dataset of information about local consents which included developer contributions that someone has requested under the LGOIMA process. The dataset was poor and missing data, leaving the entire data set in question.</p> <p>My concern is that I don't know what contributions have been collected. I'm not confident that anyone does. Less do I have any idea what investment is programmed where.</p> <p>As part of the 2021 LTP process the community was asked to comment on their desires for roading development in Richmond. It was almost a pointless</p>	<p>See comments above</p> <p>If infrastructure was required in the area to service growth development this would be funded from development contributions.</p> <p>Issues related to the condition of assets is more likely to be related to asset renewal programmes and/ or levels of service issues.</p> <p>The Council doesn't monitor or report on development contribution revenue at a suburb or locality level. Financial data could be reported at a catchment level though this may not be straightforward to action.</p>

Submitter	Submission	Staff comments
	<p>shot gun question because the council didn't provide quality information about budget and planned work programs already in place.</p> <p>The quality of information in this space seems limited and poor at best meaning that no one can make meaningful engagement.</p> <p>I am unclear if contributions collected in my area have been spent in my area. I am concerned that contributions have been collected but spent on CBD projects with an argument of "those resources are for inner city suburbs to share" while the CBD is closed off to many due to the cost of access.</p> <p>WHAT I WANT</p> <p>The council needs to dramatically improve the quality of information it presents publicly.</p> <p>The council needs to make use of public facing data systems as a default with triggers to tell interested community that updates have been made.</p> <p>https://newslane.ccc.govt.nz/news/story/council-works-with-wharenui-club-after-cost-estimate-error</p> <p>This article demonstrates how the public, with vested interest, will and do support the council to ensure that public information is correct. When data is held "behind closed doors" the community can't help, but it does pay, we pay, I pay.</p> <p>I want to know how developer contributions collected in my area are going to be spent.</p>	<p>Development contributions revenue is applied to relevant assets that support growth in a catchment. Those assets may or may not be located in the catchment itself but are required to service growth in the catchment.</p> <p>No development contributions revenue is diverted to assets that aren't required to service growth in the relevant catchment.</p> <p>The Council's capex programme is presented in the LTP and the growth-related capex programme is also presented in the schedule of assets in the DC policy.</p> <p>It is not practicable for the Council to provide a running total of DCs collected by/ for individual assets. Information on asset investment and DC revenue is not possible to be presented by area but may be able to be presented periodically by catchment.</p> <p>If the Council believes there is value in doing this we can raise it with the relevant team(s) as a future initiative.</p>

Submitter	Submission	Staff comments
		<p><i>Recommend the work being undertaken by the Council with respect to investigating approaches to improve amenity in medium density growth areas of the city is noted.</i></p> <p><i>Recommend no change to the policy at this time</i></p>
39567 Halswell Residents Association (Inc.)	<p>Similarly, development contributions should be sufficient to provide community infrastructure to the same level as for existing areas, without having ratepayers in other parts of the city providing a subsidy.</p> <ul style="list-style-type: none"> Looking at the proposed composition of charges for Halswell Greenfield: Neighbourhood parks have a proposed reduction from \$9535.80 to \$545.80. Although this accurately reflects the minimal provision for neighbourhood parks in new subdivisions in Halswell, we are deeply concerned about the limited access to recreation in these areas both in relation to existing parts of the city and in relation to the needs of a healthy community of individuals. 	<p>Council neighbourhood parks assets in Halswell currently meet the Council's agreed levels of service which are that 85% of people can access a park within 500 metres of their place of residence.</p> <p>Future investment in neighbourhood parks in Halswell will come from new neighbourhood parks as new development occurs as provided for outline development plans for the area.</p> <p>Investment in new assets in other reserves activities has been limited to what the Council can deliver within current resources and funding. The focus for Parks investment over the life of the LTP 2021-31 is in capital renewals to maintain current assets and levels of service. Renewals investment does not attract development contributions funding.</p> <p><i>Recommend no change to the policy</i></p>
39582 Marie Byrne	I also feel that there should be some prioritisation of allocation of funding towards providing community infrastructure including green spaces in areas	The draft policy includes an "intensification" catchment for the Neighbourhood Parks activity that covers the medium density and

Submitter	Submission	Staff comments
	of higher density (such as Phillipstown and Riccarton) that have less green spaces and community bumping spaces.	residential transition zones of the District Plan where most infill development is occurring. This will enable investment in improving parks assets to be better cater for infill growth in these area to be funded in part or whole from development contributions. Work is being undertaken by Council to explore how other activities might be able to better provide for increased intensification through work funded in part from development contributions and/ or financial contributions. This could include improving streetscape amenity/ tree canopy cover. <i>Work to continue to address issues raised Recommend no change to the policy at this time</i>
39516 Waikura/Linwood-Central-Heathcote Community Board	The Waikura/Linwood-Central-Heathcote Community Board area has and is experiencing the impact of increased high to medium density housing developments replacing many quarter acre/one house lots in historic established suburbs. The Board has heard from its community, grieving for the loss of amenity in the areas that high density developments have been established. The Board project "Greening the East" looked at ways of addressing the deficit of tree canopy, and greenspace within the Inner City East. This additional work may have assisted if development contributions could be spent in the specific street or neighbourhood in which the development had taken place.	<i>See comments above</i>

Submitter	Submission	Staff comments
	<p>The Board is also aware of the pressure on Council infrastructure in older established suburbs, owing to demand on infrastructure having to service significantly greater numbers of residences than was originally intended.</p> <p>The Board support a Central City Development Contribution. The introduction of a Central City Development Contribution would assist the impact of increased high to medium density housing developments replacing many quarter acre/one house lots in historic central city established suburbs.</p> <p>Board Request That any Development Contributions received by Council for a high to medium density residential development within an established suburb is used to upgrade the local amenity and to upgrade the Council's infrastructure in the same street or neighbourhood to accommodate the increased demand on aging infrastructure and not to use in other areas of the city.</p>	

5. Small residential unit adjustment

5.1 Do you agree that small residential units should receive a reduction in the development contribution charge based on an assumed lower than average demand on infrastructure?

9 submissions received

1 submission in support of small residential units receiving a reduction in development contribution charge

4 submissions against

4 submissions propose alternatives

Support

Submitter	Submission	Staff comments
39567 Halswell Residents Association (Inc.)	Anything that lowers to price for more intensive housing is a good thing, from both affordability and sustainability perspectives.	<i>Support is noted</i>

Oppose

Submitter	Submission	Staff comments
38702 Andrew Evans AE Architects	<p>Small residential unit adjustment: i helped write this policy & i can think of some other important changes that need tweaking to this policy:</p> <p>1) instead of an average of all units it should be each unit on its area, otherwise you can have say a 150sqm unit + 35sqm and end up paying full DC's on both</p> <p>2) the policy includes an allowance of round 17.05sqm (make it 17sqm!) for each unit without a garage so as to compare apples with apples, this is fair and i would retain this but the disadvantage of this either with or without garages is</p>	The small residential unit adjustment is applied on an average of all units within a single development that have a gross floor area of under 100m2. Any that are over 100m2 are excluded from that calculation. This means all units that qualify for an adjustment receive an adjustment.

	<p>2 bedroom units usually end up with no discount, whereas we wrote the policy so that a 2 bedroom unit should get a roughly 20-25% reduction (average 3 -4 bedroom=2.7 occupants, average 2BR occupancy=about 2 people (25% reduction), average 1 bedroom -1.5 occupants (40% reduction)- the settings need to be tweaked so a 2 bedroom unit say 77sqm + 17sqm garage=94sqm should have a roughly 20% discount & a 1 bedroom unit say 50sqm +17sqm=67sqm= 40% discount</p>	<p>Retaining the 17.05 m2 garage allowance would be inconsistent with District Plan rules that no longer require garaging to be provided.</p> <p>Removing the garage allowance will mean the majority of 2 bedroom houses will receive a discounted DC charge.</p> <p>It is possible to use the number of bedrooms as the basis for a reduced DC charge. This approach has not been proposed due to the difficulty in being able to clearly define what is and isn't a bedroom.</p> <p><i>Submitter's opposition is noted Further analysis on this issue will be provided to council – Attachment C.</i></p>
39538 Waipuna/ Halswell Hornby Riccarton Community Board	<p>The Board does not agree that small residential units should receive a reduction in the development contribution charge based on an assumed lower than average demand on infrastructure. The Board is not convinced that smaller units do in fact relate to a lower than average demand on infrastructure.</p> <p>While the Board accepts that the current policy provides for a small residential unit adjustment to be applied to residential units with a gross floor area of less than 100 square metres it does not support this going forward.</p>	<p><i>Submitter's opposition is noted Further analysis on this issue will be provided to council – Attachment C.</i></p>
39572 Phillipstown Community Centre Charitable Trust	<p>The PCCCT does not agree with the assumption that small residential units would have a low than average demand on infrastructure. The small residential units developed in higher density areas such as Phillipstown are often part of larger complexes meaning that there will be increased demand on infrastructure as well as local amenities.</p>	<p>The adjustment is applied per unit so larger complexes are treated the same as other developments.</p> <p><i>Submitter's opposition is noted Further analysis on this issue will be provided to council – Attachment C.</i></p>

39574 Mike Currie	I do not agree that agree that small residential units should receive a reduction in the development contribution charge based on an assumed lower than average demand on infrastructure. Each residential unit should be treated as one household equivalent unit with an according development contribution charge. The infrastructure usage of a small unit with say 3 occupants will be no different to a normal or large unit with 3 occupants.	<i>Submitter's opposition is noted Further analysis on this issue will be provided to council – Attachment C.</i>
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Alternative

Submitter	Submission	Staff comments
39580 Nicki Smetham	<p>Apply an exemption to assessment of DCP where a small residential unit is attached (part of an existing dwelling), and does not require a RC or Building Consent or a service connection. ie the DCP should include a provision that exempts a DC if it can be demonstrated that there is no demand on CCC infrastructure.</p> <p>The DCP must address the construction of a residential unit within the existing footprint of an existing residential unit separately to stand alone residential units. A DCP assessment should take into consideration the number of bedrooms as the assumed 2.5 persons is not necessarily correct. Also the assessment based on GFA should not include 17.5m2 for carparking / garaging if this can be accommodated within a lot and where the minor residential unit or small residential unit is part of an existing dwelling and car parking can be readily accommodated on site. The addition of 17.5m2 unfairly skews costs in this regard.</p>	<p>The policy provides for a new additional residential unit (whether created from within an existing building footprint or not) to be assessed for development contributions as a new residential unit. This applies regardless of the size of the new unit.</p> <p>It is possible to use the number of bedrooms as the basis for a reduced DC charge. This approach has not been used or proposed due to the difficulty in being able to clearly define what is and isn't a bedroom.</p> <p>The draft policy proposes removing the 17.05m2 garaging allowance. The situation described by the submitter is one of the reasons for doing this. <i>Further analysis on this issue will be provided to council – Attachment C.</i></p>
38737 Connor McIver	Small residential unit adjustment: I doubt that smaller units result in much less demand on infrastructure. Surely the fairest way would be to charge per bedroom as this will correspond most closely to the number of residents (and	<i>See above comments.</i>

	thus the demand on infrastructure). Commercial properties could be deemed the same as one-bedroom residential?	
39571 Jan Cook	I do not think that the 'small residential unit adjustment' is a good way to support and encourage affordable housing. A charge based on the value of a development would be a better alternative.	<p>The Local Government Act does not allow for a development contribution to be levied on the basis of the value of a development.</p> <p>The submitter may wish to lobby central government for a change to the Local Government Act to enable a DC charge set by the value of the development</p> <p>Further analysis on this issue will be provided to council – Attachment C.</p>
39580 Nicki Smetham	A DCP assessment should take into consideration the number of bedrooms as the assumed 2.5 persons is not necessarily correct. Also the assessment based on GFA should not include 17.5m2 for carparking / garaging if this can be accommodated within a lot and where the minor residential unit or small residential unit is part of an existing dwelling and car parking can be readily accommodated on site. The addition of 17.5m2 unfairly skews costs in this regard.	<p>It is possible to use the number of bedrooms as the basis for a reduced DC charge. This approach has not been used or proposed due to the difficulty in being able to clearly define what is and isn't a bedroom.</p> <p>The draft policy proposes removing the 17.05m2 garaging allowance.</p> <p>Further analysis on this issue will be provided to council – Attachment C.</p>

6. Development contributions rebate scheme for development on papakāinga land

3 submissions received, all against a rebate scheme for development on papakāinga land

Oppose

Submitter	Submission	Staff comments
38737 Connor McIver	I do not think there should be a development contribution rebate scheme for these developments. They will place exactly the same costs on the rest of the community as any other development. Ngāi Tahu has received settlement payments for breaches of Te Tiriti, going forward they should pay the same as any other developer who is creating extra infrastructure expenses for the city.	The proposed rebate for development on papakāinga land is not related to the demand placed on infrastructure or breaches of Te Tiriti o Waitangi, but is in order to facilitate development on papakāinga land. Submission is noted. Matter will be the subject of a separate report to the Finance and Performance Committee
39571 Jan Cook	I do not support a rebate scheme for development on papakainga land. Rather, I support rebates and other incentives for affordable and community housing projects, wherever they are located.	The Council already has a rebate scheme for social housing development. The proposed rebate for development on papakāinga land is not related to the demand placed on infrastructure but is in order to facilitate development on papakāinga land. Submission is noted Matter will be the subject of a separate report to the Finance and Performance Committee
39574 Mike Currie	I do not believe that introducing a development contribution rebate scheme for development on land in papakāinga zones of the District Plan is justified. The infrastructure requirements and costs for development in land in papakāinga zones will be no different to that in non-papakāinga zones.	See comments above. Submission is noted Matter will be the subject of a separate report to the Finance and Performance Committee

7. Other issues raised

7.1 Development contributions for reserves

Submitter	Submission	Staff comments
39473 University of Canterbury	It is fair that assets were growth components are either fully funded or close to fully funded be removed from the schedule of assets.	Submission noted
39567 Halswell Residents Association (Inc.)	<p>The consultation document states “The proposed development contribution charges for parks and reserves are significantly less than in the current policy.....[due to] changes to the forward capital expenditure programme in our Long Term Plan”.</p> <ul style="list-style-type: none"> This proposal and its rationale reflects an ongoing ideologically-driven retreat by City Council from a commitment to the wider Christchurch community. We don’t like it. As an association, we continually battle to get recreation space to accompany new subdivisions. One can readily see the ultimate consequences of this type of retreat by looking at the descent into heightened individualism and a politics of resentment found in the UK (the Brexit phenomenon) and the US (Trump). <p>There are two approaches to the challenges of working to maintain community outcomes – the first is to embrace the challenge in all its messiness, and the second is to pretend it doesn’t exist. City Council seems to us to be choosing the second option.</p>	<p>Investment in new assets in reserves activities has been limited to what the Council can deliver within current resources and funding. The focus for Parks investment over the life of the LTP 2021-31 is in capital renewals to maintain current assets and levels of service. Renewals investment does not attract development contributions funding.</p> <p>Recommend no change to the policy</p>
39571 Jan Cook	I request the continuation of reserve contributions at a level that ensures the development of new reserves, and in particular to secure marginal land for forest regeneration as a carbon sink.	<p>The Local Government Act doesn’t allow the Council to require development contributions if there is no corresponding capital expenditure to service growth.</p> <p>The Council would need to show that purchasing land and planting it as a carbon</p>

		<p>sink is necessary to service growth development.</p> <p>It may be that financial contributions could be taken under the Resource Management Act for this purpose to offset the carbon impact of new development. The current RMA provision doesn't specifically provide for this and it would be helpful if the replacement legislation clearly allowed councils to consider this.</p> <p><i>Recommend no change to the policy</i></p>
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7.2 Development contributions for stormwater and flood protection

Submitter	Submission	Staff comments
39498 Clayton Fairbairn	<p>It is difficult to understand how/why development contributions are collected for stormwater when as a part of new development the CCC required hydraulic neutrality and treatment of the discharge thereby removing the need for CCC to treat SW and requiring any downstream capacity upgrades. But every time DC for SW are collected.</p> <p>When new developments are required to attenuate discharges to predevelopment levels and treat SW there should be no SW contribution levied.</p>	<p>Development contributions are required for stormwater and flood protection if there is any discharge to the Council's stormwater network or the development benefits from flood protection assets that service growth development.</p> <p>On-site stormwater retention and treatment required as a condition of consent will normally result in a reduced development contribution requirement.</p> <p><i>Recommend no change to the policy</i></p>

7.3 Development contributions for transportation

Submitter	Submission	Staff comments
39473 University of Canterbury	The Active and Public Transport charge per HUE has risen exponentially from 2016. Active Travel charge has increased from \$370 to \$2,399 per HUE, and Public Transport from \$624 to \$834 per HUE. However there is little discussion in the proposed changes for the large increase in cost per HUE.	<p>The increase in the active and public transport development contribution charges result from increased investment in assets in these activities to cater for demand from growth development.</p> <p>This could/ should have been clearly explained in the consultation document.</p> <p>Submission noted Recommend no change to the policy</p>

7.4 Previous use credits

Submitter	Submission	Staff comments
39473 University of Canterbury	Our understanding is that both our Dovedale campus and Ilam campus is considered as one site/activity for the purposes of considering credits. And that approach to date has enabled credits from respective parts of our campus to offset other parts. This should be made clear in the Policy for consistent and transparent approach.	<p>The Policy does provide for lots in common ownership and used as a single development unit to be treated as single property. However the wording isn't as clear as it could be.</p> <p>It is recommended that explicit reference to contiguous lots in the same ownership is added. This should be consistent with the policy approach the Council uses for rating in these situations.</p> <p>Recommend policy is amended to improve clarity</p>

7.5 Attached small residential unit

Submitter	Submission	Staff comments
39580 Nicki Smetham	Apply an exemption to assessment of DCP where a small residential unit is attached (part of an existing dwelling), and does not require a RC or Building Consent or a service connection. ie the DCP should include a provision that exempts a DC if it can be demonstrated that there is no demand on CCC infrastructure.	<p>The policy provides for a new additional residential unit (whether created from within an existing building footprint or not) to be assessed for development contributions as a new residential unit. This applies regardless of the size of the new unit.</p> <p>If the development doesn't require resource consent, building consent or a new connection to Council infrastructure then there would be no trigger to assess for development contributions.</p> <p>While the situation described would be very unusual the Council should advocate for the ability to assess for development contributions if a new residential unit is created, regardless of consent or connection requirements.</p> <p><i>Recommend no change to the policy</i></p>

7.6 Development contributions rebates

Submitter	Submission	Staff comments
39515 Peter Scholes	The rebates within the four avenues should be stopped as it is not working.	<p>Submission noted.</p> <p><i>The Council has the opportunity to consider the rebate schemes at any time.</i></p>
39455	All developers should be paying full development contribution fees, regardless of areas, the fee waiver was bought in for central city developers, id love to	The Council has the opportunity to consider the rebate schemes at any time.

<p>Vicki Brown</p>	<p>know how many of these properties are actually used to house people rather than air BnB or commercial ventures which is not what the fee waiver was for. I understand the CCC have done no work on trying to ascertain this yet all central city development contributions have been 100% refunded to the developers, the streets outside these properties that are not repaired from damage after big developments are completed are falling back to rate payers to foot the bill which is totally unfair.</p> <p>Yet contributions that are being paid in the suburbs are not being spent to resurface roads in these suburbs that have been damaged by developers either so where is this money going to?</p>	<p>Developments receiving a central city residential development contributions rebate are required to register a covenant on the title that enables the Council to recover the rebated amount if the property is used for unhosted visitor accommodation or any other non-residential purpose.</p> <p>Development contributions are levied and the revenue invested on the basis of Council's investment in infrastructure to service growth at a catchment level.</p> <p>Development contributions are not able to be levied on the basis of damage to infrastructure by developers. This should be dealt with through a condition of consent or a similar mechanism.</p> <p>Submission is noted</p>
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7.7 Universal design standards

Submitter	Submission	Staff comments
<p>39637 Disabled Persons Assembly</p>	<p>DPA strongly recommends that the Draft Development Contributions Policy include a clause specifying that Council will remit a certain percentage of development fees in return for developers building housing or other residential developments to Universal Design standards. This will ensure that private and community sector housing developments are made accessible for all users across the course of a building's lifetime.</p>	<p>Providing a development contributions rebate to developments that include certain desirable design characteristics is possible.</p> <p>Submission is noted Staff can prepare specific advice if requested</p>

7.8 Timing of assessment/ deferral of payment

Submitter	Submission	Staff comments
39403 Clayton Fairbairn	<p>My submission is in regard to how DC are collected as part of subdivision activities. DC costs represent approximately 25% of all costs to create an allotment. Presently there is no scope provided by CCC to defer the collection of the DC. The policy allows CCC to defer the DC collection but ALL requests for relief are met with NO.</p> <p>The policy should be amended to allow DC payment at either, application for 224c certificate or, upon the sale of the allotment or, at anytime in between. CCC can be provided with security by way of an encumbrance on the allotments title noting that DC have not been paid.</p> <p>There is no risk to CCC. Either the developer will pay the DC for 224c no problem or, The developer pays to allow the sale of the allotment paying only the DC on one allotment or, The allotment is sold with DC due so DC must be paid before a BC can be accepted which is known by the purchaser because of the encumbrance on the title or, The developer in the intervening time pays DC. Whichever way CCC will always receive the DC.</p> <p>The very high DC payment is a significant hurdle to cashflow to permit development. The development which creates housing. Councils response to developers is negative and does nothing to help the housing shortage and escalating costs which are passed onto the homeowner.</p> <p>The proposed change to how DC are collected will have positive effects of easing cashflow for developers and reducing debit interest costs which in turn allows ore houses to be built at less cost.</p>	<p>The current policy provision is intended to apply to exceptional circumstances only rather than as a line of credit for developers. Approved extensions have tended to be for very minor developments and for hardship reasons – such as family flats.</p> <p>Extending the payment time requires the registering of an encumbrance on the title but is also extremely resource intensive in terms of administration.</p> <p>Deferring payment until building consent is not considered a viable option as this can be years after the 224c is issued.</p> <p>Almost all developers understand their obligations with respect to payment and requests from developers for the type of arrangement suggested by the submitter have been extremely rare.</p> <p><i>Recommend a change to the policy to clarify that a postponement of payment will be considered in extraordinary circumstances only.</i></p>
39588 Marga Lamoreaux	<p>I also believe developers should have more time to pay the contributions and that it should be after 224 is issued.</p>	<p>See comments above.</p> <p><i>Recommend no change to the policy</i></p>

7.9 Development impact fee

Submitter	Submission	Staff comments
39587 Greater Hornby Residents Association	You are generally ok with social housing having a DC rebate but you don't want to see govt and city housing providers benefiting at the expense of existing and future residents. There needs to be a way in which these providers can improve amenity in the areas where they often make substantial development for both existing residents and the residents they will bring into the area. One possible solution is to build some trigger into the development impact fee.	The proposed development impact fee is to apply in situations where the Council has discretion to waive the requirement for building consent but in so doing would remove the trigger for a development contribution assessment. The development impact fee would mean the Council wouldn't be turning down applications for a consent waiver simply to be able to assess for development contributions. Recommend no change to policy

7.10 Government funding

Submitter	Submission	Staff comments
39587 Greater Hornby Residents Association	You believe the government should be providing councils more funding for new three waters infrastructure in green field developments in order to reduce costs for all and ensure that infill development contribution money received is largely spent on improving amenity.	Development contribution revenue cannot be used for purposes other than what it was taken for. The funding cannot, therefore, be reallocated as the submitter suggests. Submission is noted

7.11 Policy definitions

Submitter	Submission	Staff comments
39580 Nicki Smetham	The definitions of residential units in the Christchurch District Plan and DCP should be consistent. Currently they are not and this results in confusion and lack of clarity. There is no definition of what constitutes a kitchen either and this should be included to avoid argument. I was recently advised by a DCP	Staff will review the consistency of definitions between the District Plan and this policy.

	processing planner that a kitchen is defined as any basin capable of being used as a kitchen sink. This is untenable, vexatious and ridiculous.	The omission of a definition of a kitchen in the policy is a drafting error and needs to be addressed. <i>Include definition of a kitchen in the policy</i>
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7.12 Online estimator tool

Submitter	Submission	Staff comments
39553 Lyttelton Port Company Limited	LPC encourage Christchurch City Council to provide additional online tools to estimate development contributions. The current online estimator is not able to calculate development contributions for non-residential development. The incorporation of development contributions catchment areas into an interaction GIS platform may also assist.	Because non-residential developments require a bespoke assessment for development contributions it is unlikely an online tool could provide the service required. Staff are unaware of any online tools that can provide an accurate estimate of development contributions for non-residential development. Developers can have an estimate undertaken by the Council's DC assessors at a very modest cost. <i>Staff will continue to look to improve the online estimator tool in ways that are cost-effective.</i>

7.13 Special assessments

Submitter	Submission	Staff comments
39473 University of Canterbury	<p>Special Assessments are for development Council consider are likely to place demand on infrastructure that is significantly different to the assumed demand based on type of business and/or the average demand per m2 of GFA for the District Plan zone.</p> <p>Education facilities are identified as an activity that requires special assessment. UC support this, as our activities on site can be diverse and complex in nature (Residential Halls, Warehouse, Office, Retail etc...) and can be unique in terms of demand on services and infrastructure.</p> <p>The scale of a build my not necessary correlate to assumed Household Equivalent Units. For example, a 3,000m2 building purpose built for engineering testing with large equipment might only have a few staff occupying the building, and as such, the actual HUE may only be one in terms of accessing network infrastructure for say transport, water supply and wastewater.</p> <p>From interpreting Policy 2.2.4 it appears that storm water and flood protection is the exception, where non-residential -development is calculated as specified in Part A.4.4. Can Council clarify this is the case so UC can apply some certainty of charge?</p> <p>Also in Appendix 4 Council has identified an assumed HUE for Education for Water Supply and Wastewater collection and treatment. Can Council clarify this is the case so we can apply some certainty of charge?</p> <p>The Transportation HUE does not identify Education as a specific activity for applying HUE. Would Education Activities be assessed under zone code Special Purpose Activities (SPO)? The new Road Network charge per HUE is 62% higher than the 2016 charge, and as such could have a significant impact on UC calculated development contributions depending on how HUE is applied. And while we appreciate you would do a special assessment for the University of Canterbury, the starting point is likely to be HUE methodology in Appendix 4 of the proposed policy.</p>	<p>Support for the use of special assessments is noted</p> <p>The reference in 2.2.4 should be to A.4.3 and not A.4.4. This will be corrected.</p> <p>The university of Canterbury campus is a complex site with a range of buildings used for various purposes.</p> <p>Most development on the campus will be assessed using a special assessment.</p> <p>The assumed demand figures referred to are used to undertake assessments for developments that are used to directly deliver education services – such as lecture halls. Developments on the campus used for other</p>

		<p>purposes – e.g. halls of residence – will be assessed using an appropriate demand profile.</p> <p>Development contributions for road network are proposed to increase for all catchments.</p> <p><i>Recommend no changes to the policy</i></p>
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7.14 Retirement villages

Submitter	Submission	Staff comments
39543 Summerset Group Holdings Ltd.	<p>Timing of assessment</p> <p>Summerset supports the Policy's assessment and timing of payment for large staged projects. Summerset agrees that where both a land use resource consent and a building consent are required, the activity should be assessed for development contributions based on the relevant Policy applicable at the time that the resource consent application is lodged, with payment of the total assessed development contributions staged such that a proportionate amount is payable prior to uplift of the code of compliance certificates for each staged building consent. That manner of assessment and payment is fair and reasonable and gives developers certainty of the development contributions payable on large, staged projects such as comprehensive care retirement villages.</p>	<p><i>Support is noted</i></p>
	<p>Assessing demand on infrastructure</p> <p>"Retirement village" is an umbrella term given to all types of retirement living, encompassing both "comprehensive care" and "lifestyle" retirement villages.</p> <p>Comprehensive care retirement villages provide a full range of living and care options from independent living through to assisted living, rest home, hospital</p>	

	<p>and memory care (dementia). The residential care component makes up a relatively high percentage of the overall unit mix.</p> <p>Lifestyle retirement villages focus mostly on independent living units with occasionally a small amount of serviced care on a largely temporary basis. When a resident becomes frail over time, usually they would be forced to move from a lifestyle village. This is because care provision is minimal and not suitable as a long-term solution.</p> <p>There is a fundamental difference between a comprehensive care retirement village (as Summerset's new villages are) and a lifestyle retirement village. Each village attracts a very different resident demographic. As discussed above, the average age of a resident entering Summerset's villages is 81 years. For completed and fully occupied villages, the average age across all residents is closer to mid-80s. Residents are typically people that chose to live in their own homes for as long as possible and have moved to a retirement village primarily due to a specific need (such as deteriorating health or mobility challenges, or for companionship – many of Summerset's residents are widows). By contrast, lifestyle villages cater for a younger, more active early retiree, with a higher proportion of couples. The average age of a resident moving into a lifestyle village is more mid-to-late 60s.</p> <p>Summerset's villages typically provide an extensive range of on-site amenities that are suited to the older residents' specialist physical and social needs – including on-demand mini-vans for residents' shopping and outings, a bar, café and restaurant, small residents' convenience shop, pool, gym, activities room, pool table, piano, hairdressing and beauty salon, treatment room, bowling green, hobbies shed, meeting rooms, theatre, library, communal sitting and lounge areas, residents' vegetable gardens and large park-like landscaped gardens. These on-site amenities greatly reduce, and in some cases eliminate, usage of Council's community amenities and facilities by Summerset's residents.</p>	<p>Staff have been having conversations with retirement village developers on the issues raised in the submission.</p> <p>It is agreed that the policy should have assumed demand on infrastructure for care beds included in its specific provisions for retirement villages.</p>
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	<p>Summerset’s average occupancy for its independent units is 1.3 residents per unit regardless of the number of bedrooms in the unit. Summerset’s average occupancy for its care units is 1 resident per unit. The reduced occupancy per unit, together with the reduced demand per occupant, results in a reduced demand on both local infrastructure and community facilities when compared against the demand assumptions for a typical household unit.</p> <p>Summerset notes that the reduced occupancy, and demand per occupant, for comprehensive care retirement villages has been thoroughly tested and is now provided for by Auckland Council which has defined “Retirement Villages” in the Auckland Unitary Plan and its Development Contributions Policy. This approach recognises the extent of the reduced demand placed on local infrastructure and community amenities in comprehensive care retirement villages.</p> <p>Summerset considers that Council, in developing the Policy, has not given adequate consideration to the unique characteristics of comprehensive care retirement villages, and the significantly lower demand profile when compared to lifestyle retirement villages, particularly due to:</p> <ul style="list-style-type: none"> • reduced activity levels of the residents due to their age and frailty; and • the provision of specialist on-site amenities provided to cater for the residents’ specific needs. <p>Summerset notes and supports the decrease in development contribution charges for retirement villages generally with a special assessment for non-residential elements of the development. However, the Policy does not distinguish between lifestyle retirement villages and comprehensive care retirement villages.</p> <p>The Policy therefore does not account for:</p> <ul style="list-style-type: none"> • the unique characteristics of comprehensive care retirement villages, as compared to lifestyle retirement villages; or 	
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	<ul style="list-style-type: none"> the extensive on-site amenities and facilities provided by comprehensive care retirement village operators. <p>Relief sought</p> <p>To fairly account for the lower demand profile, both a population per unit discount (to account for the lower occupancy) and a demand factor discount (to account for the older demographic and on-site amenities) should be applied to set specific contribution calculations for comprehensive care retirement villages.</p> <p>Summerset requests that the separate rate set for retirement villages is consistent with development contribution policies being developed by other councils. This should distinguish retirement units, and aged care rooms, and provide separate rates for each.</p> <p>Water and wastewater contributions should be assessed according to the demand factors for comprehensive care retirement villages calculated and agreed with Council at resource consent stage against those assumed for typical household equivalent units, to recognise the lower demand on those reticulated services.</p> <p>Stormwater contributions should be assessed according to the demand factors for comprehensive care retirement villages based on the site-specific stormwater management outlined and agreed with Council at resource consent stage. Council need to clearly demonstrate the causal connection between any public stormwater infrastructure required as a result of the increase in demand (if any) directly attributable by the retirement village.</p> <p>Taking into account both population per unit/room, and demand factors, Summerset suggests the rates in the table below. These are based on the equivalent rates in the current Auckland Council Development Contribution Policy, which were established after robust hearings processes including the calling of expert evidence in relation to demand.</p>	<p>Stormwater is assessed based on impermeable surface area in all assessments – retirement villages are treated the same as all other developments.</p> <p>If on-site stormwater retention and treatment is required as a condition of consent then this is taken into account in terms of a reduced demand for Council infrastructure – if appropriate. Again – this is the same for any development.</p> <p>Table A.4.1 in Appendix 4 of the draft policy states the average occupancy of 1 residential unit is 2.5 people. Table 3 of the draft policy provides a discount of 50% of 1 HUE which brings the occupancy down to 1.25 people per unit. This is less than the average occupancy of 1.3 people being sought by the submitter.</p> <p><i>Recommend the policy is changed to clearly and consistently provide for assumed demand on infrastructure from care beds and that other demand provisions are reviewed – see Attachment C.</i></p>
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				Recommend no change to the policy for stormwater assessment methodology.
	Development type	Activity	Units of demand	
	Retirement unit	Transport	0.3 HUE per unit	
		All others	0.1 HUE per unit	
	Aged care room	Transport	0.2 HUE per room	
		Community infrastructure	0.1 HUE per room	

8.15 Policies relating to waterways and wetlands

Submitter	Submission	Staff comments
39558 Davie Lovell- Smith Ltd	<p>In many of the subdivisions being undertaken around the city land is given to Council that contains Council drains and channels, which have been upgraded and naturalised as part of the subdivision works by the developers. The value of this land and all of the costs associated with the upgrades required by Council of these Council assets are not recognised in any form. They are not credited against the development contributions payable or provided for in any form of Infrastructure Provision Agreement.</p> <p>This is despite the current DC Policy providing (Clause 3.1.1) for Council to take land in lieu of payment for contributions in several different situations, including along the margins of waterways and for the protection of natural habitats. In reality, the only land credited towards the development contributions payable are for the neighbourhood parks created, whilst credits are given for where stormwater basins are being provided.</p>	<p>This is a matter dealt with by conditions of resource consent rather than the development contributions policy.</p> <p>The assets required to be upgraded are not assets for which the Council required development contributions to be paid.</p> <p>Recommend no changes to the policy</p>

	<p>The new PDC Policy is in clause 3.3 is now only seeking to provide land in lieu for neighbourhood parks, stormwater facilities and in some cases roads.</p> <p>The National Policy Statement on Freshwater Management 2020 and the National Environmental Standard on Freshwater 2020, has also stressed the increased the importance of these channels and other wetland areas around the City, regardless of how degraded or small they may be.</p> <p>The vesting of land in Council and the costs associated with upgrading the various waterways and wetlands around the City should be recognised and provided for in the 2021 DC policy, as aspects where Land in lieu of cash payment will be accepted.</p>	
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Attachment B

Staff advice to the Hearings Panel on the draft Development Contributions Policy 2021

There are three matters relating to the draft Development Contributions Policy 2021 that staff wish to raise as advice to the Hearings Panel and as recommendations for changes to the Policy for adoption.

1. Add an “Inner City” catchment for the Road Network activity

The draft policy has a central city catchment and a suburban catchment for road network, which cover the areas of the metropolitan city area outside of greenfields development areas.

The draft development contributions policy shows a “Suburban” catchment for the road network activity which includes the medium density and residential transition zones of the District Plan as well as the suburban zones further out from the city centre and the surrounding the Key Activity Centre medium density zones.

Transport growth modelling for the draft policy provided for a separate “Inner City” catchment which captures the medium density and residential transition zones of the District Plan as a discrete catchment. This wasn’t reflected in the catchment configuration presented in the draft policy or in the catchment development contributions charges schedule.

The Transport asset team recommends that a separate “Inner City” catchment is added that reflects the growth modelling undertaken. Including a separate catchment will provide the following benefits:

- Accurately captures the population growth profiles of the two distinct zones with higher growth forecast in the Inner City Zone than the Suburban zone.
- Enables the cost of growth to be more accurately allocated and recovered.
- Provides more flexibility in future to provide for investment in the medium density and residential transitional zones experiencing higher population growth and residential densification to address streetscape amenity issues.

The recommended new Inner City catchment not only captures the medium density residential areas surrounding the central city but also those surrounding the suburban Key Activity Centres.

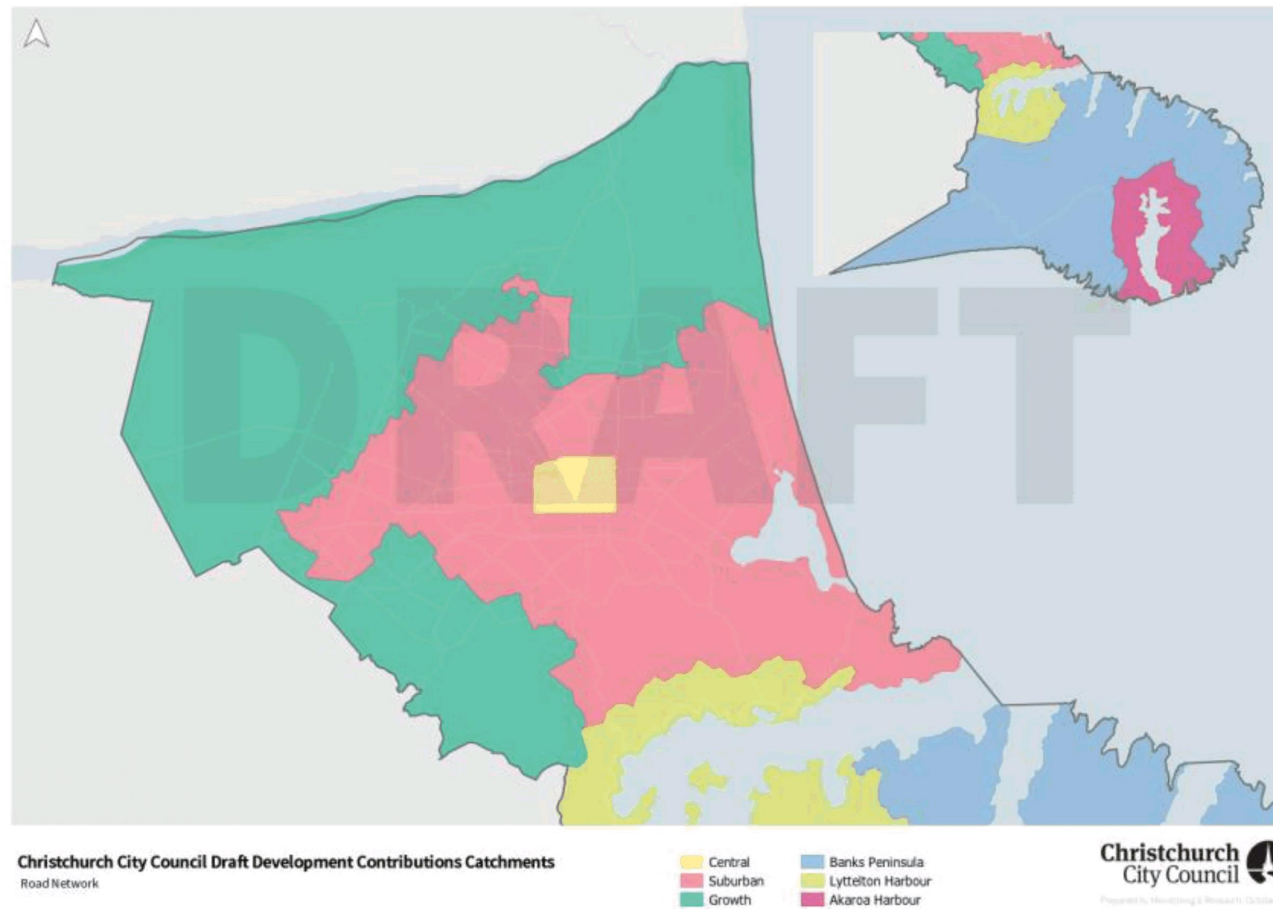
The short term impact of introducing the new catchment on development contributions charges for both the Inner City and Suburban catchments was not able to be modelled at the time this report was complete. Staff expect to be able to provide more information to elected members at the Hearings.

In the medium to long term it is expected that investment is likely to increase in the Inner City zone vis-à-vis the Suburban zone. This would be driven by investment in new approaches to enhancing the streetscape and open space environments in medium density areas experiencing high levels of growth through intensification. The Council would have the chance to consider investment option as part of any Annual Plan or Long Term Plan work programme and budget process.

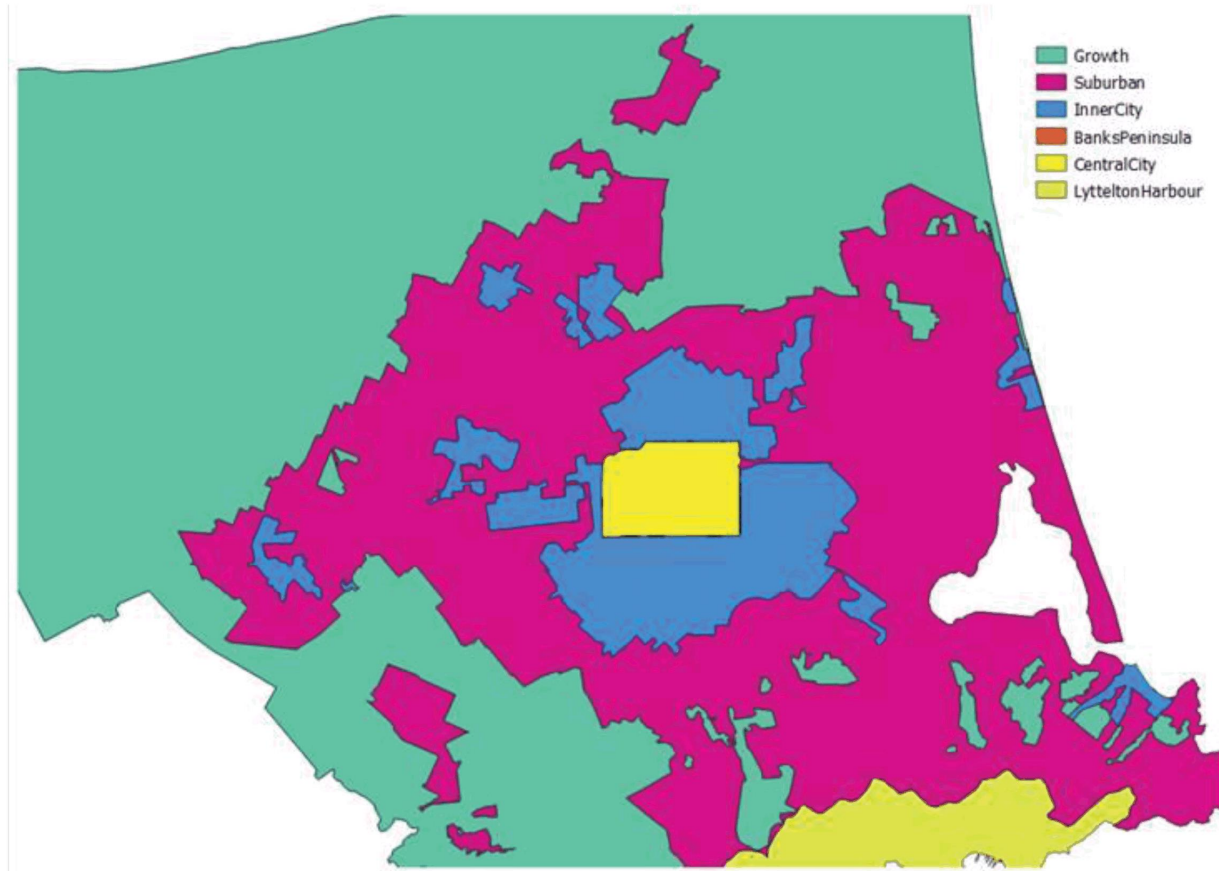
The community would be consulted on any future investment through future Annual or Long Term Plan capex projects and/or an amended DC Policy. Revised catchment charges will be provided to the Hearings panel when available.

Proposed catchment maps are presented on the following pages.

Catchment configuration from the draft development contributions policy 2021



Recommended catchment configuration



2. Reinstate the definition of a “kitchen” in the policy

This was omitted in error from the draft policy. It is an essential tool to enable development contributions assessors to establish whether a new residential unit has been created in some development projects.

This was raised in one submission to the draft policy. Staff propose the definition used in the current policy be carried over to this policy without change.

There are no impacts arising from addressing this error.

3. Add a column in the schedule of assets for transportation activities that shows NZTA funding.

Waka Kotahi NZTA funding contributions to Council transportation projects must be deducted before the growth component of a capital project is costed. Including a column in the schedule of assets showing the Waka Kotahi funding share improves transparency regarding the split of residual funding between rates and development contributions.

Attachment C

Detailed Analysis of Key Proposals

1. Akaroa Development Contributions Charges

The draft Development Contributions Policy 2021 proposes using sub district catchments instead of district-wide catchments to allocate the cost of infrastructure provision and the charges for development contributions for the following activities: water supply, wastewater collection, wastewater treatment and disposal, active travel and public transport.

Moving to catchments for water supply and wastewater treatment and disposal would significantly increase development contributions charges for development in the Akaroa area. The increases under the draft policy are:

Water supply	Current	Proposed	Wastewater Treatment & Disposal	Current	Proposed
	\$2,395	\$12,296		\$2,904	\$47,383

The increases reflect the investment the Council has made or plans to make in water and wastewater infrastructure to service Akaroa.

The overall impact of the proposed changes sees total development contributions charges for Akaroa increasing from \$21,586 to \$70,248.

It should be noted that development contributions for water supply, wastewater collection and wastewater treatment and disposal are only required if a property is to be serviced by relevant Council infrastructure.

Views of the community

The development contributions policy consultation document highlighted this as a potential issue, saying "...contributions of this magnitude may deter some types of development, particularly lower value residential developments where the development contribution charge would represent a significant portion of overall cost."

The consultation document suggested some options to reduce the charge:

- Capping the development contributions charge and using rates to fund the shortfall
- Retaining a district-wide catchment for wastewater treatment and disposal which would spread the cost of all development in Christchurch district.

The consultation document posed four questions related to this:

- Do you think we should use catchments to calculate the development contribution charges, or should we take a district-wide approach?
- A district-wide approach would mean the small number of developments outside the city are subsidised by developments in the city – do you think this is fair?
- If we use catchments to calculate development contributions do you think a maximum charge or cap should apply to keep development contributions charges in smaller communities lower?
- If we cap development contributions in rural areas what should the charge be?

The Council received 32 submissions on the draft Development Contributions Policy.

- 10 submissions supported the use of catchments to allocate the cost of development contributions
- 1 submission was received against the use of catchments and specifically against the impact the proposed use of catchments would have on Akaroa
- 10 submissions suggested variations on the catchment approach proposed, mostly with respect to specific activities and the catchment maps
- No submissions supported a cap or a maximum charge in response to the use of catchments
- 6 submissions specifically called for no maximum charge or cap, mostly on the basis that development in expensive to service areas should not be subsidised
- The Banks Peninsula Community Board submission was against the use of a maximum charge or cap and noted that it may be a good thing if an increased development contribution charge slowed development in Akaroa

While overall the submissions received were more in support of the use of catchments and against the use of a maximum charge or cap to moderate development contribution charges, it should be noted that there were very few submissions received on the draft policy and even less that specifically expressed a view on the issue of catchments.

The one submission received against the use of catchments and the impact it would have on Akaroa raises a number of issues for consideration:

- That the new wastewater treatment and disposal scheme is required to address environmental and cultural requirements and not to service growth. This is correct but the development contribution charge is calculated only on the growth component of the cost. The other components are fully funded from rates.
- Residents haven't yet made the investment in the new scheme and therefore new development should fund its share from rates along with the existing community. It is correct that the bulk of the investment has not yet been made but again, the costs associated with increasing the levels

of service and meeting environmental and cultural requirements have been excluded from the development contribution calculation. All additional growth is contributing to the need for the growth component of the costs. New development will fund its share of the increased levels of service and other costs through rates along with all existing residents.

- The development contribution charge will ensure there will be no lower cost, affordable housing built in Akaroa. It is correct that the proportion of overall costs of development taken up by development contributions for lower value developments will be higher and that could deter lower value development.

Scale of future development in Akaroa

Forecast population growth in Akaroa is less than three additional household units per year. There is limited land available for development and the costs associated with construction are relatively expensive compared to Christchurch. This indicates it is extremely unlikely there will be large-scale development occurring and it is unlikely there will be low-cost housing developed in the town.

This likely future development pattern means it is unlikely residential development in Akaroa will be highly sensitive to the cost of development contributions and on the flip side the Council's revenue from development contributions will be insignificant in comparison to the (district-wide) rates requirement for wastewater treatment and disposal.

The growth forecast for Akaroa commercial development is likewise extremely low at approximately 875m² of gross floor area over the next 10 years. However this is much harder to forecast with any degree of accuracy as a single development of say commercial accommodation could exceed this forecast. The risk that the proposed development contribution charge could deter future development appears higher for commercial development than for residential development.

There is no new industrial development forecast through to 2058.

Options

1. **Proceed with current proposal** – this option will allocate the costs of servicing growth development appropriately. The only possible issue is the community reaction to the headline development contribution charge, though the lack of submissions on this indicates the community is not particularly sensitive to this. The draw-back of this approach is that it produces very little revenue as an offset to any future community sensitivity to cost.

2. **Retain district-wide catchments for wastewater treatment and disposal** – this option does not enable the costs of servicing growth development appropriately. This option would result in significant distortions in the allocation of costs across the whole district for arguably very little gain for Akaroa.
3. **Cap Akaroa development contributions for wastewater treatment and disposal** – this option provides a compromise between the first two options at very little cost to the Council. The difficulty is establishing a figure that is low enough to reduce any risk that development contribution charges will deter new development but high enough to be equitable for developments in other parts of the district and appropriately reflects the very high cost of providing service in Akaroa. A possible approach could be to cap the development contribution for wastewater treatment and disposal in Akaroa at \$20,000. Using the development contribution charges in the draft development contributions policy this would reduce total contributions in Akaroa to \$42,865 per HUE. This approach would shift the cost of the difference to rates – approximately \$27,383 per HUE. If growth was at the approximately 2.5 HUEs per year this would be a cost to rates of approximately \$68,500 per year. If the Council favoured this approach it could be reviewed through the next review of the development contributions policy.

Recommendation

Option 1 – proceed with the current proposal to use catchments to levy development contributions with no adjustment mitigation for Akaroa

2. Small residential unit adjustment

The development contributions policy 2016 provides an adjustment in the development contribution charge for residential units with a gross floor area less than 100 square metres. The adjustment recognises that most residential units under this size will be one or two bedroom and as such are likely to exert less demand on infrastructure due to having on average less residents than larger homes. The policy has included the small residential unit adjustment since 2007.

The policy provides a sliding scale adjustment in line with gross floor area so that a residential unit with a gross floor area of 70m² would be considered to put demand on infrastructure equal to 0.7 of a household unit equivalent and therefore be charged 70% of the otherwise applicable development contribution charge.

The adjustment stops at 60m² or 0.6 HUE. The Council has introduced a small standalone residential unit rebate that extends the adjustment to 50m² or 0.5 of a HUE or a DC charge of 50% of what would otherwise be required. This rebate was introduced primarily to assist developers of family flats and it isn't available for dwellings that are not standalone.

The gross floor area measurement includes floor area related to garaging. In an attempt to provide an equitable approach residential units without garaging have 17.05m² added to the gross floor area. This therefore reduces the adjustment for residential without garaging.

The draft Development Contributions Policy 2021 proposes two changes to the current policy provisions relating to small residential unit developments:

- a. Extending the small residential unit adjustment from 60 square metres gross floor area to 35 square meters gross floor area. This is the smallest residential unit permitted under the District Plan.
- b. Removing the 17.05 square metre garaging adjustment. The adjustment is complicated for developers to understand, lacks a sound rationale and is at odds with the Council's District Plan which doesn't require garaging.

Views of the community

The consultation document outlined the proposal to extend the small residential unit rebate and to remove the garaging adjustment. It asked the following questions:

- Do you agree that small residential units should receive a reduction in the development contribution charge based on an assumed lower than average demand on infrastructure?
- Are there any alternative approaches you think we should consider with respect to smaller dwellings – e.g. base any adjustment on the number of bedrooms or number of rooms?

Nine submissions provided views on the proposed changes to the small residential unit adjustment

- One submission supported the proposal – based on any reduction to development contributions being positive
- Four submissions opposed the proposed changes – some on the basis that the size of the dwelling isn't a reliable indicator of demand on infrastructure
- Four submissions offered alternative approaches with two suggesting the number of bedrooms would be a better approach

Other councils

Most councils appear to provide some sort of adjustment in development contribution charges for smaller residential units. Most use the number of bedrooms but floor area and housing typology are also used as the basis for adjustment.

- Auckland Council uses gross floor area and housing typology. The schedule of charges includes a higher charge for residential units 250m2 and over
- Tauranga City Council uses bedrooms
- Hamilton City Council uses bedrooms and also has a large residential differential of 1.29

Council	Small residential	Small residential	Residential	Large residential
Auckland*	0m2 – 99m2 – 0.8 HUE		100m2 – 249m2 - 1 HUE	Over 249m2 – 1.2 HUE
Tauranga	2 Bedroom – 0.65 HUE	1 Bedroom – 0.5 HUE	1 HUE	N/A
Hamilton	2 Bedroom – 0.689 HUE	1 Bedroom – 0.477 HUE	1 HUE	4 or more bedrooms 1.290 HUE
Wellington		1 Bedroom – 0.7 HUE	1 HUE	N/A

*Auckland HUE differential reduces for low rise attached dwelling units and again for medium to high rise

Analysis

The small residential adjustment seeks to make the assessment of development contributions fair for developers of small units which on average will place less demand on Council infrastructure than larger units and efficient for Council staff to implement. This particularly the case for family flat developments. The challenge is to balance a fair approach with an adjustment that is efficient to implement with confidence.

The District Plan has rules regarding the minimum size of residential unit according to the number of bedrooms.

14.5.2.12 Minimum unit size

1. The minimum net floor area (including toilets and bathrooms, but excluding parking areas, garages or balconies) for any residential unit shall be:

	Number of Bedrooms	Minimum net floor area
i.	Studio.	35m2
ii.	1 bedroom.	45m2
iii.	2 Bedroom	60m2
iv.	3 or more Bedrooms.	90m2

This rule does not apply to residential units in a retirement village.

The current small residential unit adjustment therefore excludes any 3 bedroom units and provides only limited adjustment for 1 bedroom and studio units.

Data for Canterbury from the 2013 census shows a high correlation between the number of bedrooms and the average number of residents and therefore average demand on Council infrastructure.

Bedrooms	Number of Usual Residents								Total	Average
	One	Two	Three	Four	Five	Six	Seven	Eight or More		
One	4,842	2,310	270	156	30	18	-	-	7,626	1.2
Two	13,206	23,988	9,765	4,596	1,245	396	105	96	53,397	1.8
Three	10,041	40,530	34,218	35,004	12,555	3,888	1,407	912	138,555	2.6
Four	1,965	15,792	15,282	28,188	15,600	5,382	1,890	1,272	85,371	3.2
Five	279	2,142	2,655	5,184	6,060	3,186	1,218	1,008	21,732	3.9
Six	57	312	423	672	945	1,674	777	528	5,388	4.6

Seven	18	72	90	132	135	180	336	312	1,275	4.9
Eight+	30	96	81	84	75	54	63	336	819	4.1
Total Stated	30,432	85,242	62,775	74,004	36,660	14,760	5,817	4,416	314,106	2.5
Not Stated	1,944	3,198	2,466	2,412	1,485	720	147	120	12,492	2.3
Total	32,376	88,440	65,241	76,428	38,160	15,480	5,964	4,536	326,625	2.5

This shows the demand on infrastructure from an average 1 bedroom unit is 0.48 of a HUE and for a 2 bedroom unit is 0.72 of a HUE.

The proposal to change is best looked at in two parts; the adjustment mechanism, and the garaging adjustment.

Garaging adjustment - The garaging adjustment was included to ensure homes that included garaging were not disadvantaged compared those that didn't. This is effectively a tax on developments without garaging. Given the Council has removed garaging requirements from the District Plan and the Government's recent directive to councils to not require garaging the garaging adjustment now seems at odds with the wider regulatory framework.

The garaging adjustment also causes significant additional administrative requirements on the Council's development contributions assessors, particularly with garaging increasingly becoming multi-functional with the inclusion of laundry facilities, water heating and storage.

It would be simpler for the adjustment to be based on gross floor area able to be used for or converted to residential space. This would then include all garaging and attached ancillary space such as storage. Residential units without garaging or ancillary space wouldn't be assessed as having any of that space.

Small residential unit adjustment mechanism - The current adjustment approach stops at 60m² which (especially if a garaging adjustment is added) provides a relatively modest overall adjustment in development contribution charges for smaller one bedroom and studio units and especially for family flats. Extending the adjustment as proposed would particularly benefit these smaller developments and would be consistent with the demand on infrastructure indicated by the average number of residents living in one bedroom units.

Extending the adjustment to 35m² is also a fairer approach to requiring development contributions for family flats particularly when in tandem with removing the garaging adjustment, given most family flats don't include garaging.

Extending the adjustment mechanism and removing the garaging adjustment would reduce the development contributions charge for residential units with a gross floor area of less than 100m² with a consequent small reduction in council revenue than if the garaging adjustment remained. Note, it is only developments that don't include garaging that would pay less development contributions than they do now.

Overall the Council has expressed a desire for its development contributions framework to be fair and efficient and that this is particularly so for family flat developments.

Base an adjustment on number of bedrooms – This could see one and two bedroom developments receiving an adjustment commensurate with average occupancy and demand on infrastructure. This might see a 1 bedroom unit assessed as being 0.5 of a HUE (a 50% adjustment) and a 2 bedroom unit as 0.75 of a HUE (a 25% adjustment).

This wouldn't, however, take account of the overall size of the residential and whether spaces other than designated bedrooms would conceivably be used for that purpose. Some large homes and apartments with two bedrooms would qualify for an adjustment under this approach. In assessing all adjustments development contributions assessors would have to make a judgement call on what reasonably is and isn't regarded as a bedroom. This approach wouldn't capture garaging that can be converted for bedroom use.

Options

1. **Maintain the status quo** – this option would continue to disadvantage smaller developments, particularly those without garaging and family flats. It would continue the current situation of development contribution assessments being time-consuming and overly technical. The Council would need to decide whether it would continue with a rebate scheme in tandem with the adjustment provision in the development contribution policy. In the past a rebate has been provided for stand-alone residential developments to take the overall adjustment to 0.5 HUE or 50% of the development contribution charge.
2. **Maintain the status quo but remove the garaging adjustment** – this would make the assessment process less onerous and wouldn't penalise developments without a garage.
3. **Proceed with the proposed approach** – this would remove the garaging adjustment and extend the possible adjustment based on floor area to 0.35 of a HUE or 35% of the development contribution charge. This would provide the further relief for family flat developments that the Council has expressed a desire for.

Recommendation

Option 3 – Proceed with the proposed approach to remove the garaging adjustment and extend the floor area adjustment to 35m².

1. Assumed demand on infrastructure from a care bed suite at a retirement village

The submission from Summerset Retirement Villages raised the issue of the policy not having a clear assumed demand on infrastructure from care beds suites within a retirement village. Staff agree this should be addressed.

This issue has been one staff have been discussing with retirement village developers for some time. Retirement village design and concepts have evolved and the way the Council assesses these villages needs to be refined to better align with development trends.

Retirement village developers have proposed that care bed suites are treated differently to residential units in that the residents are significantly less mobile and therefore place less demand on Council infrastructure. Staff agree with the points raised but not necessarily with the demand figures Summerset have agreed with Auckland Council.

It is recommended that a new line is added to Table 3 that provides assumed demand from care bed suites.

The view of staff is that the demand below is used. This is less than Auckland Council for reserves and community infrastructure but more than Auckland Council for water and wastewater activities.

Table 3. Non-residential HUE equivalents by District Plan zone

District Plan Zone	Reserves HUE per development	Stormwater & flood protection	Water Supply per HUE	Wastewater Collection per HUE	Wastewater Treatment and Disposal per HUE	Transportati on HUE per M2 GFA	Community infrastructure
All non-residential development	1.00	0.0038					1.00
Commercial - Core						0.0317	
Commercial - Local						0.0527	
Commercial – Mixed Use						0.0053	
Commercial - Office						0.0214	
Commercial – Retail Park						0.0119	
Commercial – Central City						0.0218	
Central City Mixed Use						0.0111	

Commercial – Banks Peninsula						0.0197	
Industrial - General						0.0020	
Industrial - Heavy						0.0014	
Industrial Park						0.0018	
Commercial Central City (South Frame Mixed Use)						0.0450	
Special Purpose Airport						0.0016	
Other Zones						SA ¹	
Retirement village - residential unit only ²	0.1 HUE		0.50 HUE	0.50 HUE	0.50 HUE	0.50 HUE	0.1 HUE
Retirement village - care beds only ³	Nil		0.40 HUE	0.40 HUE	0.40 HUE	0.1 HUE	Nil

Council asset planners have considered the request and agree some further adjustment is warranted. The proposed adjustments however aren't exactly in line with those requested by the submitter Summerset Group Holdings LTD. The Summerset request is:

Development type	Activity	Units of demand
Retirement unit	Transport	0.3 HUE per unit
	All others	0.1 HUE per unit
Aged care room	Transport	0.2 HUE per room
	Community infrastructure	0.1 HUE per room

It should be noted that the Summerset figures are from Auckland and don't appear to include Watercare's new development charge for water and wastewater services.

¹ Special assessment

² This applies to residential units only. Non-residential elements such as hospital, day care units and administration areas are assessed using a special assessment.

³ This applies to residential units only. Non-residential elements such as hospital, day care units and administration areas are assessed using a special assessment.

Water and wastewater demand data obtained by the Council shows demand from rest home and care facilities can vary significantly. Having the development contribution charge for water and wastewater services at the levels proposed by staff is considered a fair approach as they are based on demand levels at the very bottom of the demand levels indicated by the data used.

The water and wastewater demand figures proposed are based on average per person water demand of 248 litres per day – the demand presented in the development contributions policy to be used as the basis for water demand calculations.

This is above the average per person demand of 200 litres per day that has been used in the past for retirement village assessment only. This demand figure has never been included in the development contributions policy and it is unclear how it became the figure used. This will result in an increase in development contribution charges for water and wastewater services for retirement village developments.

Likewise the transport asset planners believe their proposed demand on infrastructure levels align well with demand data they have used as a base for calculations.

Recommendation

That the revised demand figures for residential units and care bed units are included in the proposed Table 3 above

4. Volumes of Submissions

Reference / Te Tohutoro: 21/605801

Report of / Te Pou Nathaniel Heslop, Committee & Hearings Advisor,
Matua: nathaniel.heslop@ccc.govt.nz
General Manager / Mary Richardson, General Manager Citizens and Community,
Pouwhakarae: mary.richardson@ccc.govt.nz

1. Purpose / Te Pūtake Pūrongo

- 1.1 The purpose of this report is to collate, for the consideration of the Hearings Panel, the timetable of submitters to speak at the hearing, submissions received and further information received from submitters in response to the consultation on the Draft Development Contributions Policy 2021 (Draft Policy).
- 1.2 There have been some submitters who have already spoken to their Draft Policy submission alongside their Draft Long Term Plan submission. This was for the convenience of the presenters.
- 1.3 The items are as follows:
- 1.4 **Attachment A** – Timetable of Submitters to be heard.
- 1.5 **Attachment B** – Table of heard submissions – Submitters who have asked to be heard in person by the Hearings Panel.
- 1.6 **Attachment C** – Table of not heard submissions – Submitters who did not indicate that they wished to be heard by the Hearings Panel.
- 1.7 Note, that the Local Government Act 2002 requires, as one of the principles of consultation, that “the views presented to the local authority should be received by the local authority with an open mind and should be given by the local authority, in making a decision, due consideration” (section 82(1)(e)).

2. Officer Recommendations / Ngā Tūtohu

That the Hearings Panel:

1. Accepts the written submissions, including any late submissions, received on the Draft Development Contributions Policy 2021.

Attachments / Ngā Tāpirihanga

No.	Title	Page
A ↓	Schedule of Submissions	84
B ↓	Table of Heard Submissions	85
C ↓	Table of Not Heard Submissions	140

Time	Time Allocation	Submitter	Submission No	Page No
1pm to 1.15pm	10 minutes	Waipuna Halswell Hornby Riccarton Community Board	39538	
	10 minutes	Waipapa/Papanui-Innes Community Board	39064	
1.15pm to 1.30pm	5 minutes	Felicity Blackmore and Francois Baudet - Christchurch International Airport Ltd	39556	
1.30pm to 1.45pm	3 minutes	Tom Atkins - Climate Change	39562	
	5 minutes	David Hawke - Halswell Residents Association Inc	39567	
	5 minutes	Caroline Hutchinson - University of Canterbury	39473	
1.45pm to 2pm	3 minutes	Nicki Smetham	39580	
	5 minutes	Viviana Zanetti - Phillipstown Community Centre Charitable Trust	39572	
	3 minutes	Hayley Guglietta	39591	
2pm to 2.15pm	3 minutes	Don Gould	39598	
2pm to 2.15pm	5 minutes	Julie Comfort - Davie Lovell-Smith Limited	39558	
	3 minutes	Clayton Fairbairn	39403	
	3 minutes	Matt Morris - Climate Change	39672	
2.15pm to 2.30pm	3 minutes	Richard Holloway - Climate Change	No Submission	

#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
4	39064	Emma	Norrish	Waipapa/Papanui-Innes Community Board	Chairperson	<p>The Waipapa/Papanui-Innes Community Board thanks the Council for the opportunity to submit on the draft Development Contributions Policy 2021.</p> <p>The Board supports the draft policy in its entirety. It is fair that developers pay a share of the cost of providing infrastructure to service growth. The use of catchments in the proposed policy is a more fair and equitable way of collecting Development Contributions and the Board recommends that the Council proceeds with this.</p> <p>The Board believes Development Contributions are an appropriate way to fund improved neighbourhood park facilities in residential areas experiencing development growth.</p>	Yes

#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
16	39538	Faye	Collins	Waipuna Halswell Hornby Riccarton Community Board	Community Board Adviser	<p>2. SUBMISSION</p> <p>2.1. The Board recognises the importance of development contributions to funding new and improved infrastructure necessary for the growth of Christchurch.</p> <p>2.2. The Board notes that Greater Christchurch population expected to be about 640,000 by 2048 with 86,000 homes needing to be planned for with the majority of these being in Christchurch. It is therefore necessary to get the policy for development contributions right.</p> <p>3. COMMENTS</p> <p>3.1. Development Contributions</p> <p>3.1.1. The Board considers it fair that property developers pay a fair share of the cost of providing infrastructure that supports growth so that ratepayers are not overly burdened. Requiring developers to pay a contribution to the cost of provision of additional or new infrastructure necessitated by their development ensures that beneficiaries of the investment pay a fair share of the cost that would otherwise fall on the Council.</p> <p>3.2. Use of catchments to calculate development contributions</p> <p>3.2.1. The Board notes that under current policy development contributions are calculated at a catchment level for road transport, neighbourhood parks and stormwater and flood protection and that the Policy proposes to extend the use of catchments for Water supply,</p>	Yes

					<p>Wastewater collection, Wastewater treatment and disposal, and Public and active transport. The Board supports the use of catchments as proposed as it considers that this ensures the development contributions charged are aligned to the cost of providing infrastructure to service growth in each part of the district so that the beneficiaries of the services are paying for it.</p> <p>3.3. Use of a maximum charge or cap to keep development contribution charges in smaller communities</p> <p>3.3.1. As indicated above at 3.2.1 the Board supports the use of catchments as proposed so that the costs of infrastructure and services are borne by the beneficiaries of those The Board therefore does not support the use of a cap to keep development contribution charges in smaller communities lower.</p> <p>3.4. Development contributions for community infrastructure</p> <p>3.4.1. The Board supports the of use development contributions to recover the costs of providing future growth capacity for facilities such as swimming pools, sports centres, libraries and cemeteries, noting that this reverts to the situation that applied prior to 2014.</p> <p>3.4.2. The Board further supports the proposal that business developments are assessed for development contributions for community infrastructure as well as residential developments. The Board considers that this is appropriate given that community facilities are frequently used by the employees of businesses who may not live in the area.</p> <p>3.5. Reserve development contributions for non-residential developments</p>	
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					<p>3.5.1. The Board agrees with the proposal that non-residential developments be required to pay development contributions for reserve infrastructure as it is likely business development will place some demand on reserves.</p> <p>3.5.2. The Board accepts that given the difficulty in accurately assess this demand it is appropriate for business developments to be assessed as being one household unit equivalent for each development.</p> <p>3.6. Neighbourhood parks in infill areas</p> <p>3.6.1. The Board supports the proposal in the Policy to introduce a 'medium density infill' catchment for the neighbourhood parks activity in the Long Term Plan, which mirrors the medium density and transitional residential zones in the District Plan. The Board recognises that this will enable investment in neighbourhood parks in areas of the city where there is infill growth that would be funded from developments in those areas.</p> <p>3.6.2. The Board accepts that this provide funds for investment in existing parks as a cost-effective way to meet growing community needs without the need to acquire additional land for parks.</p> <p>3.7. Small residential unit adjustment</p> <p>3.7.1. The Board does not agree that small residential units should receive a reduction in the development contribution charge based on an assumed lower than average demand on infrastructure. The Board is not convinced that smaller units do in fact relate to a lower than average demand on infrastructure.</p> <p>3.7.2. While the Board accepts that the current policy provides for a small residential unit adjustment to be applied to residential units with a</p>	
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					<p>gross floor area of less than 100 square metres it does not support this going forward.</p> <p>3.8. Proposed and current development contribution charges</p> <p>3.8.1. The Board notes that the Development Contribution is lowered for central city and medium density development and notes that this contribution is at the same level.</p> <p>The Board suggests that the development contribution level for suburban medium density be higher than for the central city.</p> <p>3.8.2. If Council is serious about creating a vibrant central city, it needs to encourage residential development there. If it equalises the payment with medium density in the suburbs, e.g. Riccarton Hornby Linwood etc. it will defeat the goal of creating a vibrant central city residential development, as developers tend to go to medium density in the suburbs rather than provide units in the central city. It is easier and cheaper.</p>	
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SUBMISSION TO: Christchurch City Council
ON: Draft Development Contributions Policy 2021
BY: Waipuna/Halswell-Hornby-Riccarton Community Board
CONTACT: Matthew Pratt
Community Governance Manager

1. INTRODUCTION

- 1.1. The Waipuna/Halswell-Hornby-Riccarton Community Board ("the Board") appreciates the opportunity to give feedback make a submission on the Council's Draft Development Contributions Policy 2021 ("the Policy").
- 1.2. This submission was compiled by the Board's Submission Committee under the delegated authority granted by the Board.
- 1.3. The Board wishes to be heard in support of its submission.

2. SUBMISSION

- 2.1. The Board recognises the importance of development contributions to funding new and improved infrastructure necessary for the growth of Christchurch.
- 2.2. The Board notes that Greater Christchurch population expected to be about 640,000 by 2048 with 86,000 homes needing to be planned for with the majority of these being in Christchurch. It is therefore necessary to get the policy for development contributions right.

3. COMMENTS

- 3.1. Development Contributions
 - 3.1.1. The Board considers it fair that property developers pay a fair share of the cost of providing infrastructure that supports growth so that ratepayers are not overly burdened. Requiring developers to pay a contribution to the cost of provision of additional or new infrastructure necessitated by their development ensures that beneficiaries of the investment pay a fair share of the cost that would otherwise fall on the Council.
- 3.2. Use of catchments to calculate development contributions
 - 3.2.1. The Board notes that under current policy development contributions are calculated at a catchment level for road transport, neighbourhood parks and stormwater and flood

protection and that the Policy proposes to extend the use of catchments for Water supply, Wastewater collection, Wastewater treatment and disposal, and Public and active transport. The Board supports the use of catchments as proposed as it considers that this ensures the development contributions charged are aligned to the cost of providing infrastructure to service growth in each part of the district so that the beneficiaries of the services are paying for it.

3.3. Use of a maximum charge or cap to keep development contribution charges in smaller communities

3.3.1. As indicated above at 3.2.1 the Board supports the use of catchments as proposed so that the costs of infrastructure and services are borne by the beneficiaries of those. The Board therefore does not support the use of a cap to keep development contribution charges in smaller communities lower.

3.4. Development contributions for community infrastructure

3.4.1. The Board supports the use of development contributions to recover the costs of providing future growth capacity for facilities such as swimming pools, sports centres, libraries and cemeteries, noting that this reverts to the situation that applied prior to 2014.

3.4.2. The Board further supports the proposal that business developments are assessed for development contributions for community infrastructure as well as residential developments. The Board considers that this is appropriate given that community facilities are frequently used by the employees of businesses who may not live in the area.

3.5. Reserve development contributions for non-residential developments

3.5.1. The Board agrees with the proposal that non-residential developments be required to pay development contributions for reserve infrastructure as it is likely business development will place some demand on reserves.

3.5.2. The Board accepts that given the difficulty in accurately assess this demand it is appropriate for business developments to be assessed as being one household unit equivalent for each development.

3.6. Neighbourhood parks in infill areas

- 3.6.1. The Board supports the proposal in the Policy to introduce a 'medium density infill' catchment for the neighbourhood parks activity in the Long Term Plan, which mirrors the medium density and transitional residential zones in the District Plan. The Board recognises that this will enable investment in neighbourhood parks in areas of the city where there is infill growth that would be funded from developments in those areas.
- 3.6.2. The Board accepts that this provide funds for investment in existing parks as a cost-effective way to meet growing community needs without the need to acquire additional land for parks.

3.7. Small residential unit adjustment

- 3.7.1. The Board does not agree that small residential units should receive a reduction in the development contribution charge based on an assumed lower than average demand on infrastructure. The Board is not convinced that smaller units do in fact relate to a lower than average demand on infrastructure.
- 3.7.2. While the Board accepts that the current policy provides for a small residential unit adjustment to be applied to residential units with a gross floor area of less than 100 square metres it does not support this going forward.

3.8. Proposed and current development contribution charges

- 3.8.1. The Board notes that the Development Contribution is lowered for central city and medium density development and notes that this contribution is at the same level. The Board suggests that the development contribution level for suburban medium density be higher than for the central city.
- 3.8.2. If Council is serious about creating a vibrant central city, it needs to encourage residential development there. If it equalises the payment with medium density in the suburbs, e.g. Riccarton Hornby Linwood etc. it will defeat the goal of creating a vibrant central city residential development, as developers tend to go to medium density in the suburbs rather than provide units in the central city. It is easier and cheaper.

4. CONCLUSION

- 4.1. The Board requests that the council considers the matters set out above in relation to the Draft Development Contributions Policy 2021.



Debbie Mora

Chairperson Waipuna/Halswell-Hornby-Riccarton Community Board Submissions Committee



Mike Mora

Chairperson Waipuna/Halswell-Hornby-Riccarton Community Board

Dated 13 April 2021

#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
20	39556	Felicity	Blackmore	Christchurch International Airport Ltd	Christchurch International Airport Ltd	Yes Please see attached	Yes



16 April 2021

Christchurch City Council
53 Hereford Street
Christchurch

CHRISTCHURCH CITY COUNCIL DRAFT DEVELOPMENT CONTRUBTIONS 2021

Submitter: Christchurch International Airport Limited (CIAL).

Introduction

- 1 Thank you for the opportunity to comment on the Council's Draft Development Contributions Policy 2021 (*the Draft Policy*).
- 2 Christchurch International Airport (the Airport) is the largest airport in the South Island and the second-largest in the country. It connects Canterbury and the wider South Island to destinations in New Zealand, Australia, Asia and the Pacific.
- 3 Just under 7 million travelling passengers per year with a total of 109,307 aircraft movements and their associated 'meeters and greeters' pass through the Airport.¹ Combined Airport activities see between 25,000 and 30,000 people visiting the Airport every day. The Airport is home to several international Antarctic science programmes and their associated facilities. The Airport is also the primary air freight hub for the South Island, playing a strategic role in New Zealand's international trade as well as the movement of goods domestically. On that basis, the Airport is a significant physical and economic resource in national, regional and local terms.
- 4 The Airport is a key strategic infrastructure asset, as recognised in the Canterbury Regional Policy Statement (CRPS)
- 5 CIAL's core business is to be an efficient airport operator, providing appropriate facilities for airport users, for the benefit of both commercial and non-commercial aviation users and to pursue commercial opportunities from wider complementary products, services and business solutions.

¹ Total in 2019 calendar year.

COVID-19

- 6 The COVID-19 pandemic has significantly impacted the aviation sector, creating unprecedented disruption. It has resulted in a steep decline in international passenger numbers and has disrupted New Zealand's export of goods via airfreight.
- 7 Prior to the emergence of COVID-19 about 90% of New Zealand's airfreight was carried in passenger aircraft. Through the Government's International Air Freight Capacity (IAFC) scheme, funding has been provided to airlines for dedicated freight flights to ensure New Zealand's high value export products reach international markets.
- 8 CIA has played a critical role in New Zealand's ability to respond to and recover from the economic impacts of COVID -19 through the IAFC scheme. This scheme enabled up to 30 dedicated freight services a week to operate out of Christchurch, flying to multiple international destinations and utilising different carriers. These special freight services play a critical role in keeping the South Island's economy connected to the rest of the world, providing some economic stability during a recession. The IAFC continues to grow as demand requires.
- 9 Domestic tourism has recovered strongly following the lockdown, with an approximate 90% recovery in domestic passenger numbers, meaning there has been an approximate 20% increase in the number of kiwis flying domestically than prior to COVID-19.
- 10 International tourists continue to view New Zealand as natural, clean and green and as a consequence of the New Zealand Government response to COVID-19, it is also viewed as safe in terms of trusted public health measures. The tourism industry expects that New Zealand will be in high demand as a destination once COVID-19 restrictions are lifted.
- 11 Tourism New Zealand has projected that although there are current uncertainties that will dictate whether recovery takes one year or three, the modelling shows tourist demand will be back at 2019 levels by December 2022, assuming unconstrained supply.

Catchment Maps for development Contribution Activities (Appendix 2)

- 12 CIAL would like to engage with CCC on the identification of CIAL landholdings within this mapping suite.

Do you think we should use catchments to calculate the development contributions charges, or should we take a district-wide approach?

- 13 Catchments are appropriate if they are structured accurately and reflect the current infrastructure and future demands on council owned and managed infrastructure. A catchment approach enables development contributions to be accurately focused and provide a fair apportionment of infrastructure costs. CIAL would like to understand inputs into the catchment categories and welcomes engagement from CCC on the identification of CIAL landholdings within these catchments.

Why we use development contributions

Do you think it is fair that developers pay a share of the cost of providing infrastructure to service growth?

- 14 Yes, it is fair that developers pay a share of the cost of providing infrastructure service growth. However, a more equitable method to determine development contributors based on a detailed assessment of 'the use of'/'or impact to' infrastructure of the development is more appropriate than the current m² rate. It should be transparent and clearly articulated how the calculation has been made.

Dated 16 April 2021



Felicity Blackmore

**Planning and Environment Manager
Christchurch International Airport Limited**

Address for service:

#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
22	39567	David	Hawke	Halswell Residents Association (Inc.)	Secretary	Yes see attached	Yes



Halswell
RESIDENTS ASSOCIATION (inc)

The Chairma n:

Submission: Development Contributions Policy 2021 (Christchurch City Council)

Date: 17 April 2021

Wish to be heard: YES

Standing: Halswell Residents Association (Inc.) is an incorporated society and a registered charity, and advocates for the interests of people in Halswell. Activities are largely carried out by a Committee of 6-8 members, which holds monthly meetings open to the public. For submissions such as this, a draft is circulated to our committee and consensus obtained before the final version is submitted and minuted at the next monthly meeting.

The Association Chairperson is John Bennett; the Secretary is David Hawke and the Treasurer is Matthew Shallcrass. The Association can be contacted by email at

We note that City Council is two years behind the three yearly review schedule required by the Local Government Act; the present review should have been carried out in 2019.

- Having policy reviews running this late confirms to us that City Council's management systems are not fit for purpose.
- As such, their deficiencies leave City Council open to the risk that central government will intervene, perhaps in the same way that central government intervened with Environment Canterbury.

Our submission is in two parts:

1. Responses to particular sections of the consultation documentation;
2. Responses to the questions posed in the on-line consultation documentation.

1. Responses to particular sections of the consultation documentation

Development Contributions Policy objectives (from the full policy document):

- Amendment requested: include "community facilities".
 - Change Objective 1.2.1 from:
 - "To ensure developers contribute fairly to funding infrastructure and facilities to service growth development" to:
 - "To ensure developers contribute facilities (**including community facilities**) to service growth development".
 - Change Objective 1.2.3 as for Objective 1.2.1, from:

- “To ensureoverall revenue mix that funds the provision of infrastructure and facilities (including community facilities) to service new development” to:
 - “To ensureoverall revenue mix that funds the provision of infrastructure and facilities (**including community facilities**) to service new development”.
- Rationale: Communities need community facilities such as libraries and recreational spaces just as much as they need roads and sewers. Unless developers contribute to the cost of providing these facilities, the cost falls on the ratepayer. This is well stated in section 1.3.2 Fairness and equity.

“Other issues we have looked at”:

- The consultation document states “The proposed development contribution charges for parks and reserves are significantly less than in the current policy.....[due to] changes to the forward capital expenditure programme in our Long Term Plan”.
 - This proposal and its rationale reflects an ongoing ideologically-driven retreat by City Council from a commitment to the wider Christchurch community. We don’t like it. As an association, we continually battle to get recreation space to accompany new subdivisions.
 - One can readily see the ultimate consequences of this type of retreat by looking at the descent into heightened individualism and a politics of resentment found in the UK (the Brexit phenomenon) and the US (Trump).
 - There are two approaches to the challenges of working to maintain community outcomes – the first is to embrace the challenge in all its messiness, and the second is to pretend it doesn’t exist. City Council seems to us to be choosing the second option.

“Proposed and current development contribution charges”:

- As a general principle, we think that development contributions collected in a particular area should largely be spent in that area.
 - If development contributions are simply used for city-wide projects, the city comes to depend economically on continued urban sprawl.
 - Similarly, existing residents are essentially taxing new residents for the “privilege” of living in Christchurch, whether or not new residents predominate in and new developments.
 - The obvious exceptions to this principle comprise metro level projects such as (the now complete) Tūranga, and the yet to be completed Christchurch stadium, and expansions of waste water treatment capacity.
- Similarly, development contributions should be sufficient to provide community infrastructure to the same level as for existing areas, without having ratepayers in other parts of the city providing a subsidy.
- Looking at the proposed composition of charges for Halswell Greenfield:
 - Neighbourhood parks have a proposed reduction from \$9535.80 to \$545.80. Although this accurately reflects the minimal provision for neighbourhood parks in new subdivisions in Halswell, we are deeply concerned about the limited access to recreation in these areas both in relation to existing parts of the city and in relation to the needs of a healthy community of individuals.

- Although we see the logic of a Christchurch metropolitan charge for public transport, this assumes that new developments are structured so that they have access to public transport and active transport.
- Public transport has \$960.15 proposed (and \$717.60 currently), yet there is virtually no access to public transport in these areas of Halswell.
- Similarly, there is no easy access to active transport infrastructure such as cycleways in the new areas of Halswell.
 - In the current LTP consultation, we are requesting the addition of active transport connections to new subdivisions along the eastern and southern margins of Halswell.
 - Given the provisions and wording of the Development Contributions Policy review, we are confident that our requests will be adopted.

2. Responses to the questions posed in the on-line consultation documentation

1. Do you think it is fair that developers pay a share of the cost of providing infrastructure to service growth? Or should all the cost be met by ratepayers?
 - a. Developers must contribute, as they garner profits from their developments. Unless some of this profit is returned to the Council by way of development contribution, the financial benefits flow to developers and costs go to the ratepayer.
2. Are there alternative ways to fund growth infrastructure that the Council should use instead?
 - a. Council could cut private developers out of the process by doing all the development itself. This would ensure that both financial costs and benefits of new developments would go to the wider community. We doubt that this alternative would be politically palatable.
3. Do you think we should use of catchments to calculate the development contributions charges, or should we take a district-wide approach?
 - a. We support the use of catchments, otherwise the cost of otherwise unsustainable developments is subsidised.
 - b. Subdivision development is not a “community good” in the way that a new library or pool is a community good. The people who benefit from a particular development are (in the first instance) the developer through the profit made, and (in the second instance) the people who choose to live in the development.
4. A district-wide approach would mean the small number of developments outside the city are subsidised by developments in the city – do you think this is fair?
 - a. No. We do not see why developers in (say) Halswell should contribute to the cost for developers in (say) Akaroa.
 - b. The city-wide approach would be fine if development costs were approximately uniform. This will not be the case; an example in Halswell ward would be Redmond’s Spur vs Country Palms.
 - c. Finally, the urban area of Christchurch has been pumping money into Banks Peninsula ever since Christchurch City merged with Banks Peninsula, and such a proposal would make the flow even larger. (As a side recommendation, we suggest that Banks Peninsula be sold to Selwyn District Council for \$1.)
5. If we use catchments to calculate development contributions do you think a maximum charge or cap should apply to keep development contribution charges in smaller communities lower?

- a. No. Development in “smaller communities” is essentially an incentive for more development on Banks Peninsula.
 - b. Such development will inevitably have a larger carbon footprint (because of people commuting to and from Christchurch).
 - c. Furthermore, there is a strong theme in the international planning literature showing that development inevitably adversely affects biodiversity. More development on Banks Peninsula means more adverse effects on biodiversity over a wider area.
6. If we cap development contributions in rural areas what should the charge be?
 - a. Development contributions in rural areas should not be capped. They tend to be of a smaller population density (lower HUE/ha), and contribute to distributing the human footprint over a wider area.
7. Do you think we should charge development contributions for the cost of future-proofing community facilities?
 - a. Yes. Development contributions need to be at a level that pays for community facilities for the lifetime of those facilities.
8. Do you think business developments should be required to pay development contributions for community facilities such as swimming pools and libraries?
 - a. Yes. Business is an inextricable part of the community, depending for its success on a vibrant and resilient wider community.
9. Do you think business developments should be required to pay development contributions for reserve infrastructure?
 - a. Yes. Business is an inextricable part of the community, depending for its success on a vibrant and resilient wider community. Reserve infrastructure is an essential contributor to this community.
10. Do you think development contributions are an appropriate way to fund improved neighbourhood park facilities in residential areas experiencing growth development?
 - a. Yes. This fits within our principle of development contributions being sufficient to provide for the necessary community facilities in the development concerned.
11. Do you agree that small residential units should receive a reduction in the development contribution charge based on an assumed lower than average demand on infrastructure?
 - a. Anything that lowers the price for more intensive housing is a good thing, from both affordability and sustainability perspectives.
12. Are there any alternative approaches you think we should consider with respect to smaller dwellings – e.g. base any adjustment on number of bedrooms or number of rooms?
 - a. This sort of detail would be hard to implement, and assumes a particular style of development.
13. xxxx

#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
9	39473	Caroline	Hutchison	University of Canterbury	Campus Development and Space Manager	Please find attached a submission on the Draft Development Contributions Policy 2021 by the Canterbury of University	Yes



Submission by Canterbury University on Draft Development Contributions Policy 2021

Date: 7 April 2021

Address for Service/Applicants Details:

University of Canterbury

Attention: Caroline Hutchison, Campus Development and Space Manager

Phone:

email:

Proposed Change/Policy	Submission	Request
<p>Increased Use of Catchments:</p> <ul style="list-style-type: none">- Water supply- Wastewater Collection, Treatment and Disposal <p>Change methodology for assessing demand on water supply, wastewater collection and wastewater treatment and disposal infrastructure from non-residential development, is changed to be based on land use rather than a District Plan zone average.</p> <p>Calculating demand on infrastructure from non-residential development</p>	<p>University of Canterbury support the 'catchment' based approach for these services. This approach represents a more fair and equitable charge and avoids a 'subsidy' charge scenario that a district wide approach can result in.</p>	<p>Support/Approve</p>
<p>Development Contributions charge for community Infrastructure</p> <ul style="list-style-type: none">- Non-residential developments are proposed to be assessed as 1 household unit equivalent (HUE)	<p>It is our understanding that under this proposed change UC will be charge 1 HUE for a development regardless of size/scale. So for example, a new 1000m2 build would result in 1 HUE in total, so \$851.81.</p> <p>If this is the case, the financial impact is minimal. However we do think the relationship to staff and businesses placing demands on Community Infrastructure is tenuous.</p>	<p>Oppose/Decline</p>

Submission by Canterbury University on Draft Development Contributions Policy 2021

	Community Infrastructure includes Cemeteries, Playgrounds, Public Toilets, Aquatic Centres and Sport Halls. The proposed changes will now include libraries within that definition. It would be impossible to understand how much demand staff or students put on external facilities, and as such, no evidence to support the approach.	
Development Contributions charge for Reserves - Non-residential developments are proposed to be assess a 1 household unit equivalent (HUE)	It is our understanding that under this proposed change UC will be charge 1 HUE for a development regardless of size/scale. So for example, a new 1000m2 build would result in 1 HUE in total, so \$1,393.33 (assuming UC is within the Suburban catchment for Neighbourhood Parks). If this is the case, the financial impact is minimal. However we do think the relationship to staff and businesses placing demands on Reserves is tenuous. UC campus has a park like setting that contributions to the open space offering in the north west of the city and Ilam fields is used by the public. It would be impossible to understand how much demand staff or students put on external reserves, and as such, no evidence to support the approach.	Opposed/Decline
Change to schedule of assets for reserves A large number of growth assets to be funded from development contributions in the reserves group of activities will be removed from the schedule of assets	It is fair that assets were growth components are either fully funded or close to fully funded be removed from the schedule of assets.	Support/Approve
Special Assessments It is proposed that a more complete definition of a special assessment is included in the policy, along with a clear description of the methodology used for a special assessment.	Special Assessments are for development Council consider are likely to place demand on infrastructure that is significantly different to the assumed demand based on type of business and/or the average demand per m ² of GFA for the District Plan zone. Education facilities are identified as an activity that requires special assessment. UC support this, as our activities on site can be diverse and complex in nature (Residential Halls, Warehouse, Office, Retail etc...) and can be unique in terms of demand on services and infrastructure. The scale of a build my not necessary correlate to assumed Household Equivalent Units. For example, a 3,000m ² building purpose built for engineering testing with large equipment might only have a few staff occupying the building, and as such, the actual HUE may only be one in terms of accessing network infrastructure for say transport, water supply and wastewater.	Support Education Facilities being listed as being eligible for Special Assessments. Clarification of Policy Impact/Application in terms of applying HUE for Network Infrastructure

Submission by Canterbury University on Draft Development Contributions Policy 2021

	<p>From interpreting Policy 2.2.4 it appears that storm water and flood protection is the exception, where non-residential -development is calculated as specified in Part A.4.4. Can Council clarify this is the case so UC can apply some certainty of charge?</p> <p>Also in Appendix 4 Council has identified an assumed HUE for Education for Water Supply and Wastewater collection and treatment. Can Council clarify this is the case so we can apply some certainty of charge?</p> <p>The Transportation HUE does not identify Education as a specific activity for applying HUE. Would Education Activities be assessed under zone code Special Purpose Activities (SPO)? The new Road Network charge per HUE is 62% higher than the 2016 charge, and as such could have a significant impact on UC calculated development contributions depending on how HUE is applied. And while we appreciate you would do a special assessment for the University of Canterbury, the starting point is likely to be HUE methodology in Appendix 4 of the proposed policy.</p>	
Catchment Maps	Some of the catchment maps in Appendix 2 are of a scale that make it difficult to ascertain what catchment applies to particular properties, in particular the Water Supply, Wastewater Collection, Stormwater and Neighbourhood Parks catchment Maps	Provide maps of an appropriate scale on line that make it clear what catchment zone a property falls within.
Active and Public Transport	The Active and Public Transport charge per HUE has risen exponentially from 2016. Active Travel charge has increased from \$370 to \$2,399 per HUE, and Public Transport from \$624 to \$834 per HUE. However there is little discussion in the proposed changes for the large increase in cost per HUE.	<p>Provide detail on the change in methodology and increased cost for Active and Public Transport charge</p> <p>How are these applied? Is it by HUE approach in Appendix 4 for Transport?</p>
<p>Life of previous use credits</p> <p>Policy 2.3.2 – Limitations to existing demand credits</p> <ul style="list-style-type: none"> - Credits from one activity cannot be used to offset development contributions required for another activity 	Our understanding is that both our Dovedale campus and Ilam campus is considered as one site/activity for the purposes of considering credits. And that approach to date has enabled credits from respective parts of our campus to offset other parts. This should be made clear in the Policy for consistent and transparent approach.	Clarify/confirm the 'one site' approach in terms of UC activity and applying credit assessment

Submission by Canterbury University on Draft Development Contributions Policy 2021

#	SubmissionID	First name	Last name	Do you have any comments about the policy review?	I'd like to speak
27	39580	Nikki	Smetham	<p>Yes.</p> <p>Apply an exemption to assessment of DCP where a small residential unit is attached (part of an existing dwelling), and does not require a RC or Building Consent or a service connection. ie the DCP should include a provision that exempts a DC if it can be demonstrated that there is no demand on CCC infrastructure.</p> <p>The DCP must address the construction of a residential unit within the existing footprint of an existing residential unit separately to stand alone residential units. A DCP assessment should take into consideration the number of bedrooms as the assumed 2.5 persons is not necessarily correct. Also the assessment based on GFA should not include 17.5m2 for carparking / garaging if this can be accommodated within a lot and where the minor residential unit or small residential unit is part of an existing dwelling and car parking can be readily accommodated on site. The addition of 17.5m2 unfairly skews costs in this regard.</p> <p>The definitions of residential units in the Christchurch District Plan and DCP should be consistent. Currently they are not and this results in confusion and lack of clarity. There is no definition of what constitutes a kitchen either and this should be included to avoid argument. I was recently advised by a DCP processing planner that a kitchen is defined as any basin capable of being used as a kitchen sink. This is untenable, vexatious and ridiculous.</p>	Yes

#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
25	39572	Viviana	Zanetti	Phillipstown Community Centre Charitable Trust	Manager	<p>The Phillipstown Community Centre Charitable Trust (PCCCT) supports the proposal for allocation of development contributions for community infrastructure from both new business and residential developments.</p> <p>The PCCCT supports the concept of development contributions funding improved neighbourhood park facilities in residential areas experiencing growth development.</p> <p>We also advocate that areas of high intensification and social deprivation such as Phillipstown should be prioritised for projects funded from Development Contributions, particularly given the fact that the existing ratio of greenspace per head of population is likely to be very low.</p> <p>The PCCCT does not agree with the assumption that small residential units would have a low than average demand on infrastructure. The small residential units developed in higher density areas such as Phillipstown are often part of larger complexes meaning that there will be increased demand on infrastructure as well as local amenities.</p>	Yes

#	SubmissionID	First name	Last name	Do you have any comments about the policy review?	I'd like to speak
32	39591	Hayley	Guglietta	<p>I live in Richmond and I am concerned that the CCC is collecting developer contributions but not delivering civic resources to meet the growing population density and at the same time not collecting developer contributions from the social housing providers, both of which are putting strain on our resources, parks, community development organisations and facilities or lack of. None of our parks have had significant upgrades, Richmond Park has portacoms alongside old broken toilets, Avebury Park has been without play equipment in spots until just recently, there is money being spent currently for staff to be paid to come up with a design no one wants yet no money to pay for these changes, what is the point? Richmond Green has no toilets and Avebury Heritage park does not have a sensible way to water the lawn yet at the same time make it difficult for a community group to use the precious lawn (double Standard) An enthusiastic group of local kids pitched to the council Staff how they could enliven the old bowling green beside the park and make the whole park user friendly for all ages, for this to progress it will be reliant on volunteers already stretched for capacity now that the Parks community partnership funding has been cut. The ORAC parks development money has been pushed out to 2024 in the LTP if this can't be moved forward perhaps for at least the Richmond part of the ORAC some of the DC's collected could go towards collaborating with the 30 plus groups in the Riverlution collective to get this important park of the green spine underway. I am not even going to wade into the issues around 10 Shirley Road.</p> <p>Richmond and other inner city suburbs have been systematically stripped of their amenity by central and local govt, subjected to below standard (by your own reports) infill housing by developers who have no community spirit and do not care about the communities they are lining their pockets in. You are collecting these contributions and not putting the investment back where it is needed.</p> <p>Most concerning shouldn't the contributions from the more dense areas such as Richmond go towards a program of work that reinvests into those communities rather than into growth in Greenfields or other less dense areas, we have just called a climate change emergency, not to mention we have a goal for so many people living in the city this won't be achieved if there is no amenity to attract them.</p>	Yes

#	SubmissionID	First name	Last name	Do you have any comments about the policy review?	I'd like to speak
35	39598	Don	Gould	<p>Draft Development Contributions Policy 2021 Submission by Don Gould</p> <p>My family owns property in Mairehau and Richmond. One area has a very large state housing estate while the other has been zoned for intensification.</p> <p>MY CONCERNS</p> <p>In Mairehau infrastructure is only supported by rates as there is little development which attracts contributions. It concerns me that the limited development in the area impacts civic asset development.</p> <p>In Richmond we have an many new builds and civic assets are not keeping pace, roads, community resources, water, sewer have all lagged.</p> <p>Recently I was sent a dataset of information about local consents which included developer contributions that someone has requested under the LGOIMA process. The dataset was poor and missing data, leaving the entire data set in question.</p> <p>My concern is that I don't know what contributions have been collected. I'm not confident that anyone does. Less do I have any idea what investment is programmed where.</p> <p>As part of the 2021 LTP process the community was asked to comment on their desires for roading development in Richmond. It was almost a pointless shot gun question because the council didn't provide quality information about budget and planned work programs already in place.</p> <p>The quality of information in this space seems limited and poor at best meaning that no one can make meaningful engagement.</p> <p>I am unclear if contributions collected in my area have been spent in my area. I am concerned that contributions have been collected but spent on CBD projects with an argument of "those resources are for</p>	Yes

				<p>inner city suburbs to share” while the CBD is closed off to many due to the cost of access.</p> <p>WHAT I WANT</p> <p>The council needs to dramatically improve the quality of information it presents publicly.</p> <p>The council needs to make use of public facing data systems as a default with triggers to tell interested community that updates have been made.</p> <p>https://newsline.ccc.govt.nz/news/story/council-works-with-wharenui-club-after-cost-estimate-error</p> <p>This article demonstrates how the public, with vested interest, will and do support the council to ensure that public information is correct. When data is held “behind closed doors” the community can’t help, but it does pay, we pay, I pay.</p> <p>I want to know how developer contributions collected in my area are going to be spent.</p> <p>I want a running total of what has been collected in the past LTP term.</p> <p>I want to be able to see what has been spent historically and compare my own suburb with others.</p> <p>I would like a clear understanding of what a boundary is spending v’s collection.</p>	
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#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
21	39558	Julie	Comfort	Davie Lovell-Smith Ltd	Planner	Please see the attached submission	Yes

Submission to Christchurch City Council
Draft Development Contributions Policy – 2021

Submission by: Davie Lovell-Smith Ltd

Address:

1 – Waterways & Wetlands

In many of the subdivisions being undertaken around the city land is given to Council that contains Council drains and channels, which have been upgraded and naturalised as part of the subdivision works by the developers. The value of this land and all of the costs associated with the upgrades required by Council of these Council assets are not recognised in any form. They are not credited against the development contributions payable or provided for in any form of Infrastructure Provision Agreement.

This is despite the current DC Policy providing (Clause 3.1.1) for Council to take land in lieu of payment for contributions in several different situations, including along the margins of waterways and for the protection of natural habitats. In reality, the only land credited towards the development contributions payable are for the neighbourhood parks created, whilst credits are given for where stormwater basins are being provided.

The new PDC Policy in clause 3.3 is now only seeking to provide land in lieu for neighbourhood parks, stormwater facilities and in some cases roads.

The National Policy Statement on Freshwater Management 2020 and the National Environmental Standard on Freshwater 2020, has also stressed the increased importance of these channels and other wetland areas around the City, regardless of how degraded or small they may be.

The vesting of land in Council and the costs associated with upgrading the various waterways and wetlands around the City should be recognised and provided for in the 2021 DC policy, as aspects where Land in lieu of cash payment will be accepted.

2 – Catchment Maps

In addition to the above it is noted that the plans of the new catchments made available by Council are of such a poor quality and scale that it is impossible to identify exactly where these boundaries may fall. Whilst it is acknowledged that the online look-up tool will eventually provide greater detail, it is difficult for parties to identify whether or not their property falls within a particular catchment. This means that it has been difficult to ascertain the true impact of the changes to the catchments being proposed.



On behalf of Davie Lovell-Smith Ltd

16 April 2021

Date

Contact:

#	SubmissionID	First name	Last name	Do you have any comments about the policy review?	I'd like to speak
6	39403	Clayton	Fairbairn	<p>My submission is in regard to how DC are collected as part of subdivision activities. DC costs represent approximately 25% of all costs to create an allotment. Presently there is no scope provided by CCC to defer the collection of the DC. The policy allows CCC to defer the DC collection but ALL requests for relief are met with NO.</p> <p>The policy should be amended to allow DC payment at either, application for 224c certificate or, upon the sale of the allotment or, at anytime in between. CCC can be provided with security by way of an encumbrance on the allotments title noting that DC have not been paid.</p> <p>There is no risk to CCC. Either the developer will pay the DC for 224c no problem or, The developer pays to allow the sale of the allotment paying only the DC on one allotment or, The allotment is sold with DC due so DC must be paid before a BC can be accepted which is known by the purchaser because of the encumbrance on the title or, The developer in the intervening time pays DC. Whichever way CCC will always receive the DC.</p> <p>The very high DC payment is a significant hurdle to cashflow to permit development. The development which creates housing. Councils response to developers is negative and does nothing to help the housing shortage and escalating costs which are passed onto the homeowner.</p> <p>The proposed change to how DC are collected will have positive effects of easing cashflow for developers and reducing debit interest costs which in turn allows more houses to be built at less cost.</p>	Yes

#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
18	39553	Emma	Taylor	Lyttelton Port Company Limited	Independent Consultant	Please see attached letter.	Yes



15 April 2021

Development Contributions Policy Team
Christchurch City Council
Sent via the 'have your say' online portal

Dear Christchurch City Council

**SUBMISSION ON DRAFT DEVELOPMENT CONTRIBUTIONS POLICY 2021
LYTTELTON PORT COMPANY**

- 1 Lyttelton Port Company Limited (LPC) wish to take the opportunity to provide feedback on the Draft Development Contributions Policy 2021 (DCP) released for consultation by Christchurch City Council (CCC).

ABOUT LYTTELTON PORT COMPANY

- 2 LPC own and operate Lyttelton Port, which is the most significant port in the South Island in terms of total tonnages of cargo, number of containers handled, the value of exports and the value of imports. By volume, the Port accounts for 34.3% of South Island seaports' overseas exports and 37.4% of overseas imports. By value, the Port handles 41.4% of the South Island's seaports' exports and 67.9% of the South Island's seaports' imports¹.
- 3 The agriculture, forestry and fishing industries and the manufacturing industry together generate an estimated 105,000 jobs² or 34.4% of total employment in the Canterbury region and underpin much of the economic activity of Greater Christchurch³ and the wider Canterbury region. These two industry groups are highly dependent upon Lyttelton Port exporting their finished products and importing goods required as inputs to their production activities.
- 4 Lyttelton Port is recognised as a 'lifeline utility' at a national level⁴, and as "strategic infrastructure", forming part of "strategic transport networks" at a Canterbury regional level⁵.

¹ For the year ending 30 June 2020. Source: Statistics New Zealand Infoshare, Overseas Cargo Statistics (www.archive.stats.govt.nz/infoshare)

² Source: Statistics New Zealand NZ Stat. Business demography tables, February 2019 data. Assumes a regional employment multiplier of 2.0.

³ As defined in the Canterbury Regional Policy Statement (inclusive of areas within the Christchurch City, Selwyn, and Waimakariri Districts)

⁴ See Schedule 1 of Civil Defence Emergency Management Act 2002.

⁵ See Canterbury Regional Policy Statement.

- 5 Additional to Lyttelton Port, LPC operates a second key site within the Christchurch City District – CityDepot in Woolston. CityDepot provides an inland container storage and repair facility in close proximity to Lyttelton Port and is the South Island's largest empty container hub.

FEEDBACK ON THE DRAFT DCP 2021

Policy Objective 1

- 6 LPC strongly support Policy Objective 1 of the Draft Policy⁶. LPC recognise the need for development contributions and that providing additional infrastructure for a growing city comes at a cost. The Development Contributions process needs to ensure that developers contribute fairly to funding infrastructure and facilities to service growth development.
- 7 Greater transparency is sought around the contribution of DC funds from individual developers. It is requested that this information is made publicly available and accessible, such as on the CCC website. This would demonstrate fair, equitable and consistent application of the DC policy as sought by the Local Government Act 2002.

Policy Objective 2

- 8 LPC does not support Policy Objective 2 of the Draft Policy in its current form. This Policy '*to provide predictability and transparency regarding assets to be provided to service growth development and how those assets will be funded*'.
- 9 There is concern that the use of the words '*will be*' within this objective lacks certainty and accountability regarding the actual spend of DC funds on projects. The tense suggests transparency will be provided around projected funding, as opposed to actual funding.
- 10 Certainty of the actual spend of DC funds is expected by the Development Contributions Principles within Section 197AB the Local Government Act 2002 (LGA), specifically clauses:
- (d) *development contributions must be used—*
- (i) *for or towards the purpose of the activity or the group of activities for which the contributions were required; and*
- (e) *territorial authorities should make sufficient information available to demonstrate what development contributions are being used for and why they are being used*'.
- 11 Notably Clause (e) of Section 197AB of the LGA uses 'are' (underlined above) as opposed to 'will be', as proposed by CCC.
- 12 LPC recognises that the Council does identify the actual contribution of DC funds for projects that are 'Complete' within the Draft Policy (Table A1.2). However, there are a significant number of projects within this table that are 'In Progress' or subject to the 'LTP' (Long Term Plan).

⁶ Section 1.2 of the Draft Development Contributions Policy (Page 5).

- 13 It is requested that clear, easily accessible information regarding the final proportion of DC funding for these 'In progress' or 'LTP' projects is provided by Council. This provides accountability in accordance with Section 197AB(1)(d)(i) of the LGA.

Active Travel Charge

- 14 LPC oppose the proposed increase in the 'Active Travel'⁷ charge for Lyttelton. Based on the information released by Council for feedback, the proposed 'Active Travel' charge for 1 Household Unit Equivalent (HUE) in Lyttelton is expected to increase from \$425.50 to \$2,759.70.
- 15 This increase in the 'Active Travel' charge appears to be due to the change from one district-wide catchment to one Christchurch metropolitan catchment ('the Metro Zone'), within which Lyttelton is included (Figure 1).

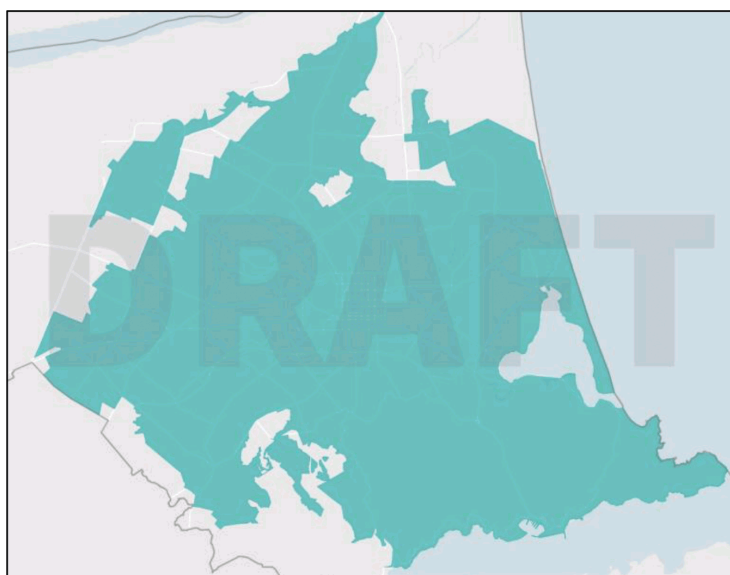


Figure 1: Proposed 'Active Travel' and 'Public Transport' Catchment Map

- 16 The grounds for this objection are as follows:
- a. Firstly, there are no 'Active Travel' projects within Table A1.2⁸ of Draft Policy that are located within Lyttelton. The list of 'Public Transport' projects also do not appear to specifically relate to Lyttelton.

⁷ Active travel is defined in Part 9 of the Draft DC Policy (Page 42) as meaning 'walking, cycling and other non-motorised forms of transport'.

⁸ Table A1.2: Schedule of growth related assets for which development contributions will be used - 2021

Section 197AB(d)(ii) of the Local Government Act 2002 requires that development contributions must be used for the benefit of the district or the part of the district that is identified in the development contributions policy in which the development contributions were required.

- b. Secondly, the inclusion of Lyttelton within the 'Metro Zone' (Figure 1) results in Lyttelton development being charged for 'Active Travel' infrastructure on the other side of the Port Hills which they have more limited access to.

It contrasts with the classification of Lyttelton within the remainder of the DC Policy, where it is recognised within its own sub-catchment for all other Development Contribution charges. The exception to this is 'Neighbourhood Parks' where Lyttelton is included in the 'Banks Peninsula' sub-catchment.

- c. Thirdly, the other transport-related DC Charge for 'Road Network' places Lyttelton within the 'Lyttelton Harbour' sub-catchment.

The Road Network charges applying to the Lyttelton Harbour, Akaroa and Banks Peninsula sub-catchments are less than the Road Network charges applying to Christchurch City sub-catchments (i.e. Central and Suburban).

There is a clear distinction made in this respect, which contrasts with the inclusion of Lyttelton within the 'Metro Zone' for 'Active Travel' and 'Public Transport'.

- 17 Based on these matters, LPC questions whether it is appropriate to include Lyttelton within this 'Metro Zone' or whether further distinction is necessary.
- 18 This reflects on Section 197AB(1)(g)(i) of the Local Government Act 2002 which allows territorial authorities to group together certain developments by geographic area [...], provided that *(i) the grouping is done in a manner that balances practical and administrative efficiencies with considerations of fairness and equity.*

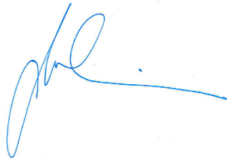
Predictability of Development Contributions

- 19 LPC encourage Christchurch City Council to provide additional online tools to estimate development contributions.
- 20 The current online estimator is not able to calculate development contributions for non-residential development. The incorporation of development contributions catchment areas into an interaction GIS platform may also assist.

Monitoring of the Development Contribution Policy

- 21 Finally, LPC encourage Christchurch City Council to regularly monitor, review and seek feedback on their Development Contributions Policy. This will be critical after the release of the adopted Development Contributions Policy and improve certainty and understanding for all developers.
- 22 LPC welcomes Christchurch City Council to contact us for any further discussion on matters raised in this letter.

Yours sincerely



MIKE SIMMERS
General Manager, Infrastructure and Property

#	SubmissionID	First name	Last name	Do you have any comments about the policy review?	I'd like to speak
24	39571	Jan	Cook	Please see attached document	Yes

To: Christchurch City Council
Draft Development Contributions Policy 2021

Submission of Jan Cook

I wish to be heard in support of this submission.

The proposal to charge \$70,000 to new developments around Akaroa Harbour, because of the cost of water and wastewater infrastructure, is iniquitous and inconsistent with the stated reasons for the policy.

*1.3.2 Current residents have made a considerable investment in the existing infrastructure.... It is appropriate that additional or new infrastructure required to service growth requirements should be funded primarily by those who benefit from it.
Capital expenditure incurred for reasons other than to provide for growth is funded from rates rather than development contributions.*

I have been closely involved with the progress of the proposed upgrades to the Akaroa and Duvauchelle wastewater systems for many years. A new treatment plant for Akaroa is necessary because of a long-standing promise to move the treatment plant from its current culturally offensive location at Takapuneke, and new disposal systems because of environmental and cultural concerns about the discharge of treated wastewater to Akaroa Harbour.
Akaroa's old, damaged and leaking sewer pipe network needs comprehensive repair, due to old age, earthquake damage and many years of neglect.

Water supply shortage is principally due to reliance on stream supplies, which are affected by the increasing severity of droughts.

The Council's 'Have your say' document states (page 3) - *We have significantly invested in upgrading water and wastewater infrastructure in Akaroa Harbour communities to bring services up to an appropriate standard.*

The new wastewater systems are needed, not because of growth demand, but because of the need to meet current environmental standards. In recognising Ngai Tahu cultural wishes, there are wide public benefits, beyond the serviced properties, from the planned new treatment plants.

Clearly current residents have NOT made considerable investment in the new wastewater infrastructure - it will be funded from borrowing, with the cost of this being met from the general rate. New developments will pay via future rates in the same way as existing properties.

The proposed development contribution for Akaroa Harbour would ensure that lower cost, affordable housing would not be built in our area.

1. I support a district wide catchment for wastewater and water supply.
2. I do not think that the '*small residential unit adjustment*' is a good way to support and encourage affordable housing. A charge based on the value of a development would be a better alternative.
3. I do not support a rebate scheme for development on papakainga land. Rather, I support rebates and other incentives for affordable and community housing projects, wherever they are located.
4. I request the continuation of reserve contributions at a level that ensures the development of new reserves, and in particular to secure marginal land for forest regeneration as a carbon sink.

#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
29	39587	Marc	Duff	Greater Hornby Residents Association	Chairperson	<p>1.7.6 Neighbourhood Parks - medium density catchment</p> <p>You are pleased with the direction of medium density catchment areas where infill DC's are made in your suburb but want the money being collected to be spent in your suburb for increasing amenity value for affected residents. The risk with the proposed direction is it is too wide and not macro enough to be of benefit to the residents who are affected by infill developments.</p> <p>1.7.9 Development Impact Fee</p> <p>You are generally ok with social housing having a DC rebate but you don't want to see govt and city housing providers benefiting at the expense of existing and future residents. There needs to be a way in which these providers can improve amenity in the areas where they often make substantial development for both existing residents and the residents they will bring into the area. One possible solution is to build some trigger into the development impact fee.</p> <p>1.7.1 Catchment assessments for more activities</p> <p>You believe the government should be providing councils more funding for new three waters infrastructure in green field developments in order to reduce costs for all and ensure that infill development contribution money received is largely spent on improving amenity.</p>	Yes

#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
31	39590	Suky	Thompson	Rod Donald Banks Peninsula Trust	Manager		Yes



Submission to

Christchurch City Council
Draft Development Contributions Policy 2021
From Rod Donald Banks Peninsula Trust

Contact details: Suky Thompson, Trust Manager,

Postal address:

We wish to be heard in support of our submission.

The Rod Donald Banks Peninsula Trust is a Christchurch City Council controlled organisation founded in 2010 for the benefit of Banks Peninsula/Te Pātaka o Rākaihautū residents and visitors.

The Trust is concerned about some aspects of the Draft Development Contribution Policy 2021.

1. Reserves Development Contribution
 - a. We wish the Development Contribution for Reserves to continue. The Trust supports the addition of more Regional parks to the Christchurch City Council portfolio to act as carbon sinks.
 - b. We note that in the 2018 LTP, increasing the land area of Regional Parks in line with population growth was a core KPI in the service plans. Our understanding is that the Development Contribution provides a way for funding for new parks to keep pace with population growth.
 - c. We do not support the limits on the amount of reserves development contribution. This should be related to the value of the new subdivision created. Reserves are an increasingly important service given their value for carbon sequestration and low carbon activities.
2. We suggest that assessing all non-residential activities as 1 HUE regardless of scale or land-use is inappropriate – non-residential activities should need to contribute based on their impacts or likely impacts and demands on services
3. We request greater clarity around which sites Development Contributions apply to. It is unclear from the draft policy whether properties that do not receive a service will be charged. This is of particular concern for the Akaroa Harbour catchment area where levies are to increase substantially.
 - a. We have made enquiries with staff and been informed that this is covered by section 2.2.6.
 - b. We request this is reworded to make it clear. At present our reading of this clause is that a property in Akaroa Harbour would be assessed for the Development Contribution for water supply and wastewater because it would be in an area that is serviced.
 - c. The wording should be change to state:
 - i. ~~A development outside the areas serviced~~ **A property that is not able to connect to the service** for one or more of water supply, wastewater collection, and wastewater treatment and disposal will not be assessed for development contributions for a non-serviceable activity. If the property is able to connect to the network in the future, it will be assessed for a development contribution for the relevant activity at that time.
4. We are concerned about the proposed level of increase for Development Contributions in the Akaroa Harbour
 - a. The Trust recently carried out a subdivision in the Akaroa Harbour area as part of a project to secure enduring public access on a walking track critical to linking together the Akaroa walking network.

- b. As part of the subdivision process, public access to the track was protected by way of an easement with the Council and the native forest on the property protected in perpetuity with a covenant. The Trust constructed a new route for the track through this forest.
- c. Despite the public amenity created the Trust was charged a Reserves Development Contribution.
- d. When we challenged this on the basis that we had created the equivalent to a reserve, the Regional Parks Team paid the bill instead. We felt this was counter-productive. The fee should have been waived – not charged to the Parks team when a new Park asset had been created by us as the developer.
- e. We reviewed the Development Contribution Policy carefully at the time and concluded that the process of assessing public benefit of our project had not been handled in the manner set out in the policy.
- f. While we were not motivated by profit for our subdivision project, the costs of carrying it out were very high, and the process onerous. We would expect private individuals or organisations carrying out subdivisions that have a public benefit aspect to be able to do so and still make a profit on their work.. We are therefore concerned that increased fees proposed may cause perverse incentives.
 - i. Although the project we have referred to was in the rural zone, and therefore the new fees might not apply, a similar project that created public amenity within a serviced area would be hit with the very high new fees.
 - ii. The Council must take care that developments that have a public benefit are not stymied from occurring because the Development Contributions have become too high.

#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
33	39596	Vicki	Brown	Richmond Residents and Business Association	Chair		Yes



**CHRISTCHURCH CITY COUNCIL DEVELOPERS CONTRIBUTIONS SUBMISSION
April 2021**

The Richmond Resident and Business Association.

CORE PURPOSES of the RICHMOND RESIDENTS' and BUSINESS ASSOCIATION (est 2018)

- To actively involve the community when promoting projects which enhance the quality of the resident and business communities' lives in the Richmond area.
- To provide a forum for the consideration, development and advancement of ideas which benefit the wellbeing of all the community.

CORE VALUES of the RICHMOND RESIDENTS' and BUSINESS ASSOCIATION (est 2018)

- To achieve our purposes through transparency, collaboration, respect, empathy and acceptance of our diversity, views and needs.
- To protect and treasure our heritage and develop pride in being part of the Richmond area.

Contents:

1. Background
2. Development Contributions
3. Parks and Reserves
4. Urban Plan/Master Plan
5. Richmond Safe Cycle Network Route
6. Rejuvenation of Stanmore Road
7. Conclusion

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1. Background

Richmond is an active community represented by strong community leadership which is embedded in many hard-working organisations in the suburb.

We have and continue to work hard to develop strong and collegial relationships with CCC staff and elected members within the Council itself and the two Community Boards our suburb straddles.

Richmond as a suburb and community has committed time and resources as a community to read, understand and consider the CCC developer contributions. We have kept both relevant community boards, Linwood-Central-Heathcote and Papanui-Innes, fully informed of our concerns and plans and have developed a good collaborative working relationship. We submit here to the whole of council to put forth our case for an appropriate and equitable allocation of Council financial and non-financial resources for Richmond relevant to the ongoing development in our area.

Specifics are stated below for your consideration. At an overview level however, we request the following:

- An increase in the level of financial budget allocation across all service areas (and indicative budgets for the following two years) with fair allocation matching the volume of development occurring.
- Continued commitment from the elected members responsible for Richmond to building a strong and connected working relationship with the representatives of the Richmond Community.

We urge the council to favorably consider this submission and recognise our willingness for representatives from RRBA to be heard in person should a hearing process occur.

2. Development Contributions

RRBA continues to express concern about the significant intensive development in our suburb over the last couple of years, much of which the existing community considered inappropriate and significantly detrimental to the existing amenity in our community. We remain of the view that the intent of the act and code has been misinterpreted and urge CCC to test this on behalf of its ratepayers by submitting its operational process willingly to the rigor of judicial review on our behalf.

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This high level of intensification will have added considerably to the council coffers by the Development Contributions paid to facilitate each of these developments. RRBA seeks to understand directly the value contributed to this and to receive an explanation of how the financial resource generated in our community has been applied to mitigate the loss of amenity in our community. We are particularly interested in the value and allocation of funds collected in respect of:

- Sports Parks (Richmond Park)
- Garden and heritage parks (Avebury House lawn and park)
- Neighborhood parks (Richmond Village Green, Avebury Park, Petrie Park, Richmond Park)
- Otakaro-Avon River Corridor (Fitzgerald Ave to Banks Ave)
- Water supply
- Wastewater collection
- Road network (Road damages from new developments)
- Stormwater and flood protection

These are all items where Richmond has been underfunded and has experienced a significant reduction in the level of service over a long period (in our view) and we seek for this inequity to be redressed as a priority over other locations in the city where the level of service is far in excess of that provided to our community and in some instances not matched to the development volumes.

3. Parks and Reserves

Within the board areas of Richmond there are four parks the OARC and a reserve. Petrie Park, Richmond Park, Avebury Park, Richmond Village Green, OARC: Riverbend Refuge, Adventure Ave, Richmond Community Garden, Cultivate Canterbury, Richmond Way find, Riverlution, Sutton House. Shirley Reserve.

Otakaro Avon River Corridor (OARC): As a park as it sits in the parks department and line item 61723 Red Zone Regeneration Red Zone Parks Development but has NO funding allocation till the 2024/25 year we strongly encourage council to move this forward to 2021/22 particularly in areas such as Richmond where there is already amazing community activation, a large volunteer base and desire to turn a small amount of CCC funding into a larger amount which gives a good return to the ratepayer.

Petrie Park: In 2020 we informed Council in our submission that we have been working alongside the Parks team at Petrie Park with local children and a vision from the

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community as to what this space might look like. This work is progressing very slowly and a further allocation of budget to assist in achieving this would be much appreciated. We anticipate the need for continued planning in the 2022 year with execution in 2022/23. Again I well used space that needs further development to ensure high intensification developers are held to account and supplying green spaces through there contributions that a fairly allocated to area that are experiencing this.

Richmond Park: This park has very old play equipment which should be considered for upgrade. This is a well-used park which caters for tennis and cricket clubs and other regular physical activities. This park is in close proximity to a very large development in construction on Banks Ave and another potential housing infill for sale currently at the old Marion College site.

Richmond Village Green: The Green which is situated centrally within the commercial hub, is a high use park and is also utilized by the Jean Seabrook Memorial School (A school for children with severe specific learning disabilities. RRBA advocates for a budget to be applied to continued landscape enhancements of the park eg: fruit trees planted in the green area for community needs/use. (Reduction of the hedge height on Stanmore Road boundary to improve visual amenity.)

Avebury Park: is a beautiful historic park which adjoins the grounds of Avebury house and the boundary of the Richmond Community Garden. This is a high use area where further housing intensification is taking place and requires funding from council to ensure it is able to facilitate to increased volume and use.

We also have a desire to see more green spaces in our area for the use of community, particularly for those who are so highly intensified they don't actually have any green space for there own private use. We are called the Garden City but allowing developers to use a scorched earth policy and not demanding our heritage trees be retained is so sad, grown for 100s of years, taken out in minutes for one more shoebox unit is a shameful practice on the council consenting department.

4. Urban Plan/Master Plan

Since 2020 the R.R.B.A. has contracted a University of Canterbury Pace student who produced a review of Richmond which contained a number of proposals for an urban plan for our area. It details what amenities we already have, and suggests what other amenities are required to ensure our neighborhood is active and proportionate to other

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areas that have seen a lot more progress and a lot less intensification. More recently, the R.R.B.A. has contracted an “Activator” who is doing further research; data gathering, seeking opinion, etc. and some of this work is relevant to the production of any urban plan. Council involvement in the production of a long-term urban plan for Richmond should, in our opinion, be part of any city development plan.

The best way to enrich a community is to have the community involved in deciding what works, and what is still needed. Through developing ownership of the assets, a proud, engaged residents, Community Boards and Council will achieve the best possible outcomes for all.

5. Richmond Safe Cycle Network Route

Our submission for a Cycle Safety Route has been presented at a hearing of the Urban Development and Transport Committee. It is our fervent hope that the ideas presented are acted on within the near future. With more intensification going on it is imperative that safe access ways are available where we have properties with minimal parking onsite pushing cars into the roadside in turn causing hazards for cyclists trying to navigate the streets of Richmond, one of the oldest suburbs in CHCH we have some very narrow streets.

6. Rejuvenation of Stanmore Road

It's great to see huge development in plan for the top end of Stanmore Road in the Linwood area through the, as a committee we question why this greening the East initiative has only been seen to fruition by the community board for such a small part and not created in the entirety of Stanmore Road “Green corridors, more trees and walkways, spaces that encourage biodiversity, nature play areas, pocket parks, and interweaving cultural history are all part of the integrated plan to boost the natural habitat to support ecological health and community well-being in the city's inner east.”

Michelle Lomax Chairperson of the working group says, “While we in the city, it's vital that we improve our ‘breathing space’ and everyday living by enhancing and expanding our green space. Greater infrastructure in our local neighborhoods is core to this plan.”

Jake McLellan said, “We are investing in our area to benefit our wider community and ensure that residents have access to great services and facilities,” he says.

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We understand there is work going on around a cycle way from Linwood to meet with the Otakaro green spine (In Richmond) which just makes common sense that this so widely planned out for the whole inner east area. With the huge amount of new and refurbished social housing as well as private development taking one single property to 21 on the same section size in one instance. Yet there is no plan from the same community board to help with creating better amenity in the other east areas of there ward. This is shortsighted and disappointing from our prospective where we have a Community Group and a community screaming out for better enhancement of the well overdue capital spend in Richmond.

Spend of council regarding development contributions should be allocated depending on where these funds are coming from. This would ensure the amenity is there for the areas where residents lack this due to the council approval of District Plan rule's that determine over 65 households per hectare in Residential Medium Density Zones is a "non-complying activity" which must then be notified, therefore giving the public (us) the legally binding right to object to the non-compliant elements.in turn not catering with enough green space for the local community.

7. Conclusion

Social Housing does not have to pay in developer contributions so we see lots of social housing going up at great density in some cases and nothing to replace amenity lost nor contributing to the considerable additional demand on system and social amenity in the area. There is (in our opinion) no additional support in terms of the service requirements of the tenants that are being dumped in our neighborhood – are we as existing residents supposed to provide this support ourselves or allow community dissatisfaction and its various off shoot impacts change the nature and values of our existing neighborhood. This seems to be the case in the current approach from the local body and central government bureaucracy. In our grass roots/coal face opinion – this is far from acceptable.

We continue to be a community that wants to be actively engaged and would like to continue fostering a creative and collaborative approach. The successful historical outcomes include, Richmond road repair program, planters for Stanmore Road, Community engagement with Avebury House, Richmond Community Garden, Riverlution, and, more recently, Avon Ōtākaro Network. More recently, the interest in the work of this association is attracting more interest and support within the Richmond community. The community has more ownership and engagement when it is involved through the entire process.

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We want to work together with the City Council and the Community Boards to create a suburb that uses our ideas, skills and talents where we can all participate towards a final outcome and feel valued.

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#	SubmissionID	First name	Last name	Name of organisation	Your role within organisation	Do you have any comments about the policy review?	I'd like to speak
34	39597	Hamish	Wheelans	Hamish Wheelans	Yoursection	<p>Please find below an email sent to Council staff, to which I did not receive a response. There are significant changes to the HUE's stormwater treatment and discharge levies, and there appears little justification for the same.</p> <p>....., can you please provide some clarification for a potential significant issue that could arise that Im looking to avoid.</p> <p>The current DC Policy assessments are being reviewed. The proposed policy is a minor overall increase on the current policy however the assessment items vary significantly, for instance the s/w & flood protection increases from \$4,727/hue to \$13,436/hue.</p> <p>Our consent for River Stone, which you are working on, proposes to discharge to Greens Drain via a shallow swale, as agreed with Brian Norton, with a view long term that we will be constructing basins south of Greens Drain that will detain, treat and discharge.</p> <p>Brian has stated we would receive 96% credit on s/w DC if we build the basins and vest in CCC.</p> <p>My concern is as follows:</p> <ol style="list-style-type: none"> 1. Our current consent is issued under the current policy; 2. We discharge to Greens Drain without treatment; 3. No credits are offered as we are not treating the discharge; 	Yes

					<p>4. We apply for a 224 and pay based on the current DC policy/assessment;</p> <p>5. Our consent 2 (yet to be lodged) is issued under the proposed DC policy;</p> <p>6. By the time of applying for 224 for consent 2, the basins south of Greens Drain are built and operational, with capacity to cover consent 1, we can only be granted 96% credit for consent 2 DC assessment.</p> <p>My question:</p> <p>1. When applying for 224 for consent 2, will we receive credits for the consent 1 payment, in other words CCC refunds us 96% already paid; or</p> <p>2. If refunds are out of the question, how do we get the credits from consent 1?</p> <p>My suggestion would be that we obtain consent 1, start civil works, build the basins before applying for 224 for consent 1, provide a s/w treatment train south of Greens Drain which is worthy of the credits and CCC agree to a reassessment of the DC's for consent 1 under the DC policy of the day, which would be the policy in effect after 1/7/21. There could be a note to the applicant to this effect in the consent conditions.</p> <p>Can you please either call me to discuss or confirm CCC will agree to a reassessment in the event a full treatment train is available at the time of 224 being applied for, for consent 1.</p> <p>I note submissions on the proposed DC Policy close Sunday 18 April so your early response would be appreciated.</p> <p>Regards</p>	
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						<p>Hamish Wheelans</p> <p>yoursection.nz</p> <p>www.yoursection.nz</p> <p>I submit there requires greater clarity around calculations of DC's per item, and a greater opportunity to enable reassessments where requested by an applicant, particularly where DC's have changed significantly from the prior policy.</p>	
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From: Hamish Wheelans
Sent: Wednesday, 14 April 2021 11:35 AM
To:
Cc: Kim Seaton
Subject: River Stone Consents & DC Assessment

can you please provide some clarification for a potential significant issue that could arise that I'm looking to avoid.

The current DC Policy assessments are being reviewed. The proposed policy is a minor overall increase on the current policy however the assessment items vary significantly, for instance the s/w & flood protection increases from \$4,727/hue to \$13,436/hue.

Our consent for River Stone, which you are working on, proposes to discharge to Greens Drain via a shallow swale, as agreed with Brian Norton, with a view long term that we will be constructing basins south of Greens Drain that will detain, treat and discharge.

Brian has stated we would receive 96% credit on s/w DC if we build the basins and vest in CCC.

My concern is as follows:

1. Our current consent is issued under the current policy;
2. We discharge to Greens Drain without treatment;
3. No credits are offered as we are not treating the discharge;
4. We apply for a 224 and pay based on the current DC policy/assessment;
5. Our consent 2 (yet to be lodged) is issued under the proposed DC policy;
6. By the time of applying for 224 for consent 2, the basins south of Greens Drain are built and operational, with capacity to cover consent 1, we can only be granted 96% credit for consent 2 DC assessment.

My question:

1. When applying for 224 for consent 2, will we receive credits for the consent 1 payment, in other words CCC refunds us 96% already paid; or
2. If refunds are out of the question, how do we get the credits from consent 1?

My suggestion would be that we obtain consent 1, start civil works, build the basins before applying for 224 for consent 1, provide a s/w treatment train south of Greens Drain which is worthy of the credits and CCC agree to a reassessment of the DC's for consent 1 under the DC policy of the day, which would be the policy in effect after 1/7/21. There could be a note to the applicant to this effect in the consent conditions.

Can you please either call me to discuss or confirm CCC will agree to a reassessment in the event a full treatment train is available at the time of 224 being applied for, for consent 1.

I note submissions on the proposed DC Policy close Sunday 18 April so your early response would be appreciated.

Regards

Hamish Wheelans
yoursection.nz

www.yoursection.nz

Please note, our postal address has changed to the above address.

#	SubmissionID	First name	Last name	Do you have any comments about the policy review?	I'd like to speak
13	39515	Peter	Scholes	The differential between residential and business should be increased. There is no cost to business as rates are a taxable expense. As Hornby / Hei Hei / Sockburn have no cycle-way can we please be excepted from the active travel rate. Can the uniform annual gen CH charge be decreased to \$50. Everyone benefits from public transport so everyone should pay for it. The rebates within the four avenues should be stopped as it is not working. A new development charge should apply starting at 10 times the rates for all un-developed land. The things about Moncks Bay and main Road development should be payed for by the people in the area, because the benefits to greater Christchurch is small to nil. Also, by paying for it the community will own it and keep it safe. Main South Road needs some improvements both to the road surface and landscape, between Spring Road and Hornby Mall. Because most of Christchurch use this road and benefit from it all of Christchurch should pay for this improvement. I have a feeling with the "beneficiary should pay principle" that Hornby and Hei Hei's community will have to pay the cost for there new pool and service centre by them self and still contribute to Halswell's and Riccarton's service centre and pool. I thank Councillor and staff for taking the time to read my submission.	Yes

#	SubmissionID	Do you have any comments about the policy review?	Hearing	Name Name of organisation	Suburb
36	39637	DPA strongly recommends that the Draft Development Contributions Policy include a clause specifying that Council will remit a certain percentage of development fees in return for developers building housing or other residential developments to Universal Design standards. This will ensure that private and community sector housing developments are made accessible for all users across the course of a building's lifetime.	No	Disabled Persons Assembly	Wellington
30	39588	I support the increase of development contributions provided the money goes back into the infrastructure in the area where the development is. I also believe developers should have more time to pay the contributions and that it should be after 224 is issued.	No	Marga Lamoreaux	Diamond Harbour
28	39582	<p>I support the allocation of development contributions towards community facilities and infrastructure, including allocation of contributions from business developments.</p> <p>I also feel that there should be some prioritisation of allocation of funding towards providing community infrastructure including green spaces in areas of higher density (such as Phillipstown and Riccarton) that have less green spaces and community bumping spaces.</p>	No	Marie Byrne	Phillipstown
26	39574	<p>I believe that that developers should pay a fair share of the cost of providing infrastructure to service growth.</p> <p>There are alternative ways to fund growth infrastructure such as privatising but I consider this to be very risky. The Christchurch City Council Draft Long Term Plan 2021–31 is proposing an Excess Water Use Targeted Rate for Households. I support this because I see the charge as not being for water but for the infrastructure needed to provide the water. The volume of water used is simply a measure of the use of that infrastructure, provided that money is used for the water infrastructure and not as a fundraiser to be siphoned to other infrastructural or other areas of expenditure. It's important to understand that water infrastructure is expensive and the more water we use the more likely it is we will need larger pipes to carry the water, additional water reservoirs, additional water pump station upgrades, additional land to dispose wastewater to and so on...</p> <p>A charge for water use above 700l/day/household incentivises people to reduce water use (or put in alternative systems for irrigation), reducing the overall cost to the ratepayers. From my point of view, it's fair in that those who drive the need for additional infrastructure pay a greater contribution to the cost of that infrastructure.</p> <p>However, alongside the excess water charge Council should be educating around the importance of conserving water, and best use in terms of rainwater/greywater collection.</p> <p>With respect to rain water tanks, all new housing should include rain water tanks and subsidies be made available for existing housing to incorporate rain water tanks. Refer to supporting document "Regulating for supplementary water supply (rainwater tanks)" produced by the Canterbury Sustainable Homes Working Party. This will help reduce the load on the Christchurch City drinking water supply and infrastructure.</p> <p>The Water Services Bill is about to go through its second reading. Between this Bill and the formation of Taumata Arawai (the enforcement agency) we are going to see the costs of Three Waters provision increase. In addition to that we have the Government proposing the creation of regional entities that will take over the management of Three Waters infrastructure unless councils decide to 'opt out'.</p> <p>With the cost of running these systems set to increase but councils' debt limits remaining where they are, local councils are facing a dilemma. Unless they can find a way to fund the ongoing provision of Three Waters infrastructure to a standard that meets the requirements of the proposed Water Services Bill (and any additional requirements of Taumata Arawai), they will be unable to 'opt out' of the entity model.</p> <p>I support Council opting out. This is because I believe that water services will be less expensive for users if they remain with Council. I also believe there's a reduced risk of privatisation if they remain with Council.</p> <p>So, given all of the context above, my position is to support</p>	No	Mike Currie	New Brighton

		<p>1. the charge for excess water and</p> <p>2. Ensure Development Contributions are fixed at a level high enough to fund the additional costs of providing infrastructure to such a level as to meet the Water Services Bill</p> <p>I believe this because it's the fairest way to fund infrastructure and the best way to ensure our Councillors can retain control over our Three Waters networks. Maintaining democratic governance of these networks at a local level means we'll all still get a say in chlorination and fluoridation of supplies, the cost of supplies and the way they are funded etc.</p> <p>I believe Council should use catchments to calculate the development contributions charges rather than a district-wide approach. Developments outside the city should not be subsidised by developments in the city. I do not believe that a maximum charge or cap should be applied to keep development contribution charges in smaller communities lower.</p> <p>I believe Council should charge development contributions for the cost of future-proofing community facilities and that business developments should be required to pay development contributions for community facilities such as swimming pools and libraries.</p> <p>I also believe that business developments should be required to pay development contributions for reserve infrastructure.</p> <p>I agree that development contributions are an appropriate way to fund improved neighbourhood park facilities in residential areas experiencing growth development.</p> <p>I do not agree that agree that small residential units should receive a reduction in the development contribution charge based on an assumed lower than average demand on infrastructure. Each residential unit should be treated as one household equivalent unit with an according development contribution charge. The infrastructure usage of a small unit with say 3 occupants will be no different to a normal or large unit with 3 occupants.</p> <p>I do not believe that introducing a development contribution rebate scheme for development on land in papakāinga zones of the District Plan is justified. The infrastructure requirements and costs for development in land in papakāinga zones will be no different to that in non-papakāinga zones.</p> <p>Active travel includes footpaths and cycle ways. I am not sure that I agree that that areas outside the city are not charged a development contribution for active travel, footpaths and cycle ways will be required whether or not the area is inside or outside the city. The only reason for not providing development contribution for active travel for areas outside the city would be if footpaths and cycle ways are not provided in these areas.</p> <p>With the exception of:</p> <ul style="list-style-type: none">- Halswell wastewater, storm water and flood protection- Belfast storm water and flood protection- Lyttelton water supply- Akaroa water supply, wastewater collection, treatment and disposal <p>there is a significant drop in the Development Contribution charge for the Three Waters (water supply, wastewater and storm water infrastructure). Given my comments above on the pending impact of the Water Services Bill, I am very concerned that Development Contributions are bot fixed at a level high enough to fund the additional costs of providing infrastructure to such a level as to meet the Water Services Bill</p>			
23	39568	I support the proposed policy. If anything I would like to see development contributions reduced further for higher density infill developments and increased for greenfield development, but I don't know enough to comment further at this time.	No	Finn Jackson	Addington
15	39523	I support the Development Contributions Policy as it stands. I support the general direction that the CCC is taking for development contributions. I hope that CCC politicians will continue to lobby for central government funding of infrastructure for Christchurch.	No	Tony Dale	Christchurch

19	39555	Please see attached	No	Victoria Peden Banks Peninsula Community Board	Little River
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SUBMISSION TO: Christchurch City Council

ON: Draft Development Contributions Policy 2021

BY: Te Pātaka o Rākaihautū/Banks Peninsula Community Board

ADDRESS: Lyttelton Service Centre
PO Box 73027
CHRISTCHURCH 8154
Email: adrianna.hess@ccc.govt.nz

DATE: 15 April 2021

1. INTRODUCTION

The Te Pātaka o Rākaihautū/Banks Peninsula Community Board (the “Board”) appreciates the opportunity to provide a submission on the Draft Development Contributions Policy 2021.

2. SUBMISSION

By way of an opening statement, the Board supports the use of catchments to calculate development contributions, including the proposed infrastructure types of water supply, wastewater collection, wastewater treatment and disposal, as well as public and active transport.

The Board believes that the real cost of establishing new infrastructure should be the onus of the developer, rather than the burden of the ratepayer. The Board understands that development contributions within Christchurch city will be lower than on Banks Peninsula, because the infrastructure to connect new dwellings already exists. Correspondingly, many places on Banks Peninsula require new or remarkably improved infrastructure, which results in substantially higher development costs such as those proposed for Akaroa Harbour.

The Board believes that reserve infrastructure should be included in business development contributions, not only because business development will place additional demand on reserves, but also because we must continue to support green spaces in our city to combat our climate and ecological crises. Likewise, development contributions are an appropriate way to fund neighbourhood parks in residential areas experiencing growth development.

While some may see higher development contributions as a disadvantageous deterrent for development, the Board believes that this is actually advantageous; higher charges will restrict growth from happening too fast and causing strains on existing infrastructure. Therefore, the Board supports the proposed household unit equivalents in this consultation. However, future increases should be reconsidered with regard to whether a maximum charge or cap would be appropriate.

Yours sincerely,



Tori Peden
Chairperson
Te Pātaka o Rākaihautū/Banks Peninsula Community Board



17	39543	Please see attached	No	Young Yoon Summerset Group Holdings Limited	Wellington Central
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Summerset Group Holdings Limited
Level 27, Majestic Centre, 100 Willis St, Wellington
PO Box 5187, Wellington 6140

Phone: 04 894 7320 | Fax: 04 894 7319
Website: www.summerset.co.nz

SUBMISSION

IN THE MATTER OF:	Draft Development Contributions Policy 2021
TO:	Christchurch City Council
FROM:	Summerset Group Holdings Limited
DATE:	15 April 2021
BY ONLIN SUBMISSION:	https://ccc.govt.nz/the-council/consultations-and-submissions/haveyoursay/

INTRODUCTION

1. Summerset Group Holdings Limited (*Summerset*) is pleased to have the opportunity to submit on the Draft Development Contributions Policy 2021 (*Policy*) proposed by Christchurch City Council (*Council*).

BACKGROUND

2. Summerset is New Zealand's second largest developer and operator of retirement villages, which makes it one of New Zealand's largest home-builders. Summerset currently operates 29 villages across New Zealand and provides a range of living options for more than 6,200 residents.
3. Summerset develops and operates comprehensive care retirement villages, that provide a continuum of care, with its villages containing independent (villas, townhouses and apartments) and assisted living units and residential care (rest home, hospital and dementia level care) for those who require greater assistance. The average age of a resident entering Summerset's villages is 81 years. This resident demographic is associated with a typically low pattern of demand on community infrastructure, amenities and facilities.
4. Over the next 50 years the number of people over 75 in New Zealand is expected to grow by 245% from 315,000 in 2018 (6% of the population) to more than one million in 2068 (17% of the population). It is therefore vital that the regulatory environment recognises and provides for the development that is required to meet this growing demand, and funding for associated infrastructure, but does so on a fair and proportionate basis.

LOWER OCCUPANCY AND DEMAND PROFILE

5. Summerset acknowledges the Policy's recognition of retirement villages' lower demands on the city's infrastructure in general. However, Summerset considers that the Policy fails to take into account the characteristics of comprehensive care retirement villages and their occupants, and the extent to which they, on their own or cumulatively with those of other developments, substantially reduce the impacts of development on requirements for infrastructure and community facilities in the district or parts of the district both at a citywide and local area level.
6. "Retirement village" is an umbrella term given to all types of retirement living, encompassing both "comprehensive care" and "lifestyle" retirement villages.
 - 6.1. As discussed above, comprehensive care retirement villages provide a full range of living and care options from independent living through to assisted living, rest home, hospital and memory care (dementia). The residential care component makes up a relatively high percentage of the overall unit mix.
 - 6.2. Lifestyle retirement villages focus mostly on independent living units with occasionally a small amount of serviced care on a largely temporary basis. When a resident becomes frail over time, usually they would be forced to move from a lifestyle village. This is because care provision is minimal and not suitable as a long-term solution.
7. There is a fundamental difference between a comprehensive care retirement village (as Summerset's new villages are) and a lifestyle retirement village. Each village attracts a very different resident demographic. As discussed above, the average age of a resident entering Summerset's villages is 81 years. For completed and fully occupied villages, the average age across all residents is closer to mid-80s. Residents are typically people that chose to live in their own homes for as long as possible and have moved to a retirement village primarily due to a specific need (such as deteriorating health or mobility challenges, or for companionship – many of Summerset's residents are widows). By contrast, lifestyle villages cater for a younger, more active early retiree, with a higher proportion of couples. The average age of a resident moving into a lifestyle village is more mid-to-late 60s.
8. Summerset's villages typically provide an extensive range of on-site amenities that are suited to the older residents' specialist physical and social needs – including on-demand mini-vans for residents' shopping and outings, a bar, café and restaurant, small residents' convenience shop, pool, gym, activities room, pool table, piano, hairdressing and beauty salon, treatment room, bowling green, hobbies shed, meeting rooms, theatre, library, communal sitting and lounge areas, residents' vegetable gardens and large park-like landscaped gardens. These on-site amenities greatly reduce, and in some cases eliminate, usage of Council's community amenities and facilities by Summerset's residents.
9. Summerset's average occupancy for its independent units is 1.3 residents per unit regardless of the number of bedrooms in the unit. Summerset's average occupancy for its care units is 1 resident per unit. The reduced occupancy per unit, together with the reduced demand per occupant, results in a reduced demand on both local infrastructure and community facilities when compared against the demand assumptions for a typical household unit.
10. Summerset notes that the reduced occupancy, and demand per occupant, for comprehensive care retirement villages has been thoroughly tested and is now provided for by Auckland Council which has defined "Retirement Villages" in the Auckland Unitary Plan and its Development

Contributions Policy. This approach recognises the extent of the reduced demand placed on local infrastructure and community amenities in comprehensive care retirement villages.

11. Summerset considers that Council, in developing the Policy, has not given adequate consideration to the unique characteristics of comprehensive care retirement villages, and the significantly lower demand profile when compared to lifestyle retirement villages, particularly due to:
 - 11.1. reduced activity levels of the residents due to their age and frailty; and
 - 11.2. the provision of specialist on-site amenities provided to cater for the residents' specific needs.

POLICY NOT FAIR AND PROPORTIONATE

12. Summerset notes and supports the decrease in development contribution charges for retirement villages generally with a special assessment for non-residential elements of the development. However, the Policy does not distinguish between lifestyle retirement villages and comprehensive care retirement villages.
13. The Policy therefore does not account for:
 - 13.1. the unique characteristics of comprehensive care retirement villages, as compared to lifestyle retirement villages; or
 - 13.2. the extensive on-site amenities and facilities provided by comprehensive care retirement village operators.

RELIEF SOUGHT

14. To fairly account for the lower demand profile, both a population per unit discount (to account for the lower occupancy) and a demand factor discount (to account for the older demographic and on-site amenities) should be applied to set specific contribution calculations for comprehensive care retirement villages.
15. Summerset requests that the separate rate set for retirement villages is consistent with development contribution policies being developed by other councils. This should distinguish retirement units, and aged care rooms, and provide separate rates for each.
16. Water and wastewater contributions should be assessed according to the demand factors for comprehensive care retirement villages calculated and agreed with Council at resource consent stage against those assumed for typical household equivalent units, to recognise the lower demand on those reticulated services.
17. Stormwater contributions should be assessed according to the demand factors for comprehensive care retirement villages based on the site-specific stormwater management outlined and agreed with Council at resource consent stage. Council need to clearly demonstrate the causal connection between any public stormwater infrastructure required as a result of the increase in demand (if any) directly attributable by the retirement village.

18. Taking into account both population per unit/room, and demand factors, Summerset suggests the rates in the table below. These are based on the equivalent rates in the current Auckland Council Development Contribution Policy, which were established after robust hearings processes including the calling of expert evidence in relation to demand.

Development type	Activity	Units of demand
Retirement unit	Transport	0.3 HUE per unit
	All others	0.1 HUE per unit
Aged care room	Transport	0.2 HUE per room
	Community infrastructure	0.1 HUE per room

TIMING

19. Summerset supports the Policy's assessment and timing of payment for large staged projects. Summerset agrees that where both a land use resource consent and a building consent are required, the activity should be assessed for development contributions based on the relevant Policy applicable at the time that the resource consent application is lodged, with payment of the total assessed development contributions staged such that a proportionate amount is payable prior to uplift of the code of compliance certificates for each staged building consent. That manner of assessment and payment is fair and reasonable and gives developers certainty of the development contributions payable on large, staged projects such as comprehensive care retirement villages.

FINAL COMMENTS

20. Summerset is grateful for the opportunity to submit on the Policy and looks forward to engaging with the Council during the consultation process. Summerset would be happy to meet with the Council or attend at a hearing to discuss this submission further if that would assist.



Aaron Smail
General Manager Development
Summerset Group Holdings Limited

14	39516	Please see attached	No	Alexandra Davids Waikura/Linwood- Central-Heathcote Community Board	Linwood
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SUBMISSION TO: Christchurch City Council

ON: Draft Development Contributions Policy 2021

BY: Waikura/Linwood-Central-Heathcote Community Board

CONTACT Alexandra Davids
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1. INTRODUCTION

The Linwood-Central-Heathcote Community Board (the Board) thanks the Council for the opportunity to submit on the Draft Development Contributions Policy 2021.

The Board would like to speak to this submission.

2. SUBMISSION

- 2.1. The Waikura/Linwood-Central-Heathcote Community Board area has and is experiencing the impact of increased high to medium density housing developments replacing many quarter acre/one house lots in historic established suburbs.
- 2.2. The Board has heard from its community, grieving for the loss of amenity in the areas that high density developments have been established. The Board project "Greening the East" looked at ways of addressing the deficit of tree canopy, and greenspace within the Inner City East. This additional work may have assisted if development contributions could be spent in the specific street or neighbourhood in which the development had taken place.
- 2.3. The Board is also aware of the pressure on Council infrastructure in older established suburbs, owing to demand on infrastructure having to service significantly greater numbers of residences than was originally intended.
- 2.4. The Board support a Central City Development Contribution. The introduction of a Central City Development Contribution would assist the impact of increased high to medium density housing developments replacing many quarter acre/one house lots in historic central city established suburbs.

Board Request

That any Development Contributions received by Council for a high to medium density residential development within an established suburb is used to upgrade the local amenity and to upgrade the Council's infrastructure in the same street or neighbourhood to accommodate the increased demand on aging infrastructure and not to use in other areas of the city.



Alexandra Davids
Chairperson, Linwood-Central-Heathcote Community Board
13 April 2021

12	39498	<p>It is difficult to understand how/why development contributions are collected for stormwater when as a part of new development the CCC required hydraulic neutrality and treatment of the discharge thereby removing the need for CCC to treat SW and requiring any downstream capacity upgrades. But every time DC for SW are collected.</p> <p>When new developments are required to attenuate discharges to predevelopment levels and treat SW there should be no SW contribution levied.</p>	No	clayton fairbairn	Christchurch
11	39488	<p>Owners of densification projects should definitely contribute to costs – the wear and tear of huge machines – diggers, concrete mixers, jack hammers to break existing concrete is taking a huge toll of road and pavement surfaces. The ageing water pipes and waste/storm water drains are also overloaded with the addition of 10 or more households where there was only one. Relaying such pipes should have happened before the development. As it is, new houses have nice new pipes and drains but the sheer volume cannot be accommodated by the ageing infrastructure. Another method of obtaining funds could be offering City Development shares to the public (not only local) to encourage private (including Mum & Dad investors) investment. Consider how much is raised by “give a little” projects. The advantage of share is the prospect of a return/dividend which would be more attractive than the current interest rate offered by banks. Catchments are confusing! The maps show that one place could be in several different catchments – for water supply & treatment, parks, roads etc. Businesses should contribute to parks as they benefit from green, breathing surrounds for work, travel to and from home, and leisure.</p>	No	Jennifer Porter	Upper Riccarton
10	39476	<p>The Waitai/Coastal-Burwood Community Board broadly support the Proposed Development Contributions Policy 2021.</p>	No	Bebe Frayle Waitai/Coastal- Burwood Community Board	Shirley
8	39455	<p>All developers should be paying full development contribution fees, regardless of areas, the fee waiver was bought in for central city developers, id love to know how many of these properties are actually used to house people rather than air BnB or commercial ventures which is not what the fee waiver was for. I understand the CCC have done no work on trying to ascertain this yet all central city development contributions have been 100% refunded to the developers, the streets outside these properties that are not repaired from damage after big developments are completed are falling back to rate payers to foot the bill which is totally unfair.</p> <p>Yet contributions that are being paid in the suburbs are not being spent to resurface roads in these suburbs that have been damaged by developers either so where is this money going to?</p> <p>Developer contributions should be spent back directly to amenity of the suburb they were paid for. Residents have to put up with the construction noise, vibration, sometimes the aggression and blind sidedness of the CCC issuing non notifiable consents with less than minor issues just to get them through with no consideration of the community they are approving in and the amenity that is not put back in further frustrates an already heated environment.</p>	No	Vicki Brown	Christchurch
7	39419	<p>I support the changes proposed in this policy review. I think that calculating by catchments is a fair approach, and smaller communities and greenfield developments should pay high development contributions. We need to be encouraging more infill development to reduce urban sprawl, and the associated climate change implications, so I do not think there should be any caps for smaller settlements or rural areas. The development contribution should reflect the actual costs as much as possible and should not be subsidised by developments in the city.</p>	No	Arthur McGregor	Broomfield

2	38737	<p>Why we use development contributions: It is absolutely fair that developers pay a contribution towards infrastructure to service growth. If ratepayers are expected to meet these costs there will always be a perverse incentive on Council to not allow any further development in Christchurch. Alternative way of funding infrastructure: it would be good if the GST from construction went to the local government for infrastructure rather than central but of course this is not something that Council can control.</p> <p>Use of catchments to calculate development contributions: I support a catchment approach rather than a district-wide approach. It is not fair for developments outside of the city to be subsidised by those in the city. It is also not helpful in the overall goal of living more sustainably, subsidies for these properties will just encourage urban sprawl. Catchments should not be subject to a cap, someone has to pay and it is fair that it falls to the developers in those locations.</p> <p>Development contributions for community infrastructure: Yes, charges should reflect the cost of future-proofing facilities. Also, business developments should contribute too.</p> <p>Reserve development contributions for non-residential: Yes, business developments should be required to pay for reserve infrastructure.</p> <p>Neighbourhood parks in infill areas: This proposal seems reasonable.</p> <p>Small residential unit adjustment: I doubt that smaller units result in much less demand on infrastructure. Surely the fairest way would be to charge per bedroom as this will correspond most closely to the number of residents (and thus the demand on infrastructure). Commercial properties could be deemed the same as one-bedroom residential?</p> <p>Papakāinga zones: I do not think there should be a development contribution rebate scheme for these developments. They will place exactly the same costs on the rest of the community as any other development. Ngāi Tahu has received settlement payments for breaches of Te Tiriti, going forward they should pay the same as any other developer who is creating extra infrastructure expenses for the city.</p>	No	Connor Mclver	Sockburn
1	38702	<p>Small residential unit adjustment: i helped write this policy &i can think of some other important changes that need tweaking to this policy:</p> <p>1) instead of an average of all units it should be each unit on its area, otherwise you can have say a 150sqm unit + 35sqm and end up paying full DC's on both</p> <p>2) the policy includes an allowance of round 17.05sqm (make it 17sqm!) for each unit without a garage so as to compare apples with apples, this is fair and i would retain this but the disadvantage of this either with or without garages is 2 bedroom units usually end up with no discount, whereas we wrote the policy so that a 2 bedroom unit should get a roughly 20-25% reduction (average 3 -4 bedroom=2.7 occupants, average 2BR occupancy=about 2 people (25% reduction), average 1 bedroom -1.5 occupants (40% reduction)- the settings need to be tweaked so a 2 bedroom unit say 77sqm + 17sqm garage=94sqm should have a roughly 20% discount & a 1 bedroom unit say 50sqm +17sqm=67sqm= 40% discount</p> <p>I would love to come and speak to these changes but sadly im too darn busy designing multiunit dwellings in the central city and nearby neighbourhoods</p>	No	Andrew Evans AE Architects Ltd.	city

5. Hearing of Submissions / Ngā Tāpaetanga

Submitters who indicated that they wished to be heard in person will present to the Hearings Panel. A schedule of presenters can be found at the beginning of the Volume of *“Heard Submissions”*.