

Christchurch City Council

ATTACHMENTS - ADDITIONAL DOCUMENTS

Date: Wednesday 11 May 2022
Time: 9am
Venue: Council Chambers, Civic Offices,
53 Hereford Street, Christchurch

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Submission ID	Do you support the proposed changes?	Comments - Please be as specific as possible to help us understand your views	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
45961	Yes	The Board is in support, in principle, of the proposed change to curbside collection rates that would allow multi-unit residential developments to opt out of kerbside collection, since they pay for this without being able to use it. We would like Council assurance that waste management providers are required to provide for rubbish, recycling and green waste collection, as this is often not the case currently.	No	Bebe Frayle	Waitai Coastal-Burwood Community Board	Submissions Committee Chairperson
45934	Yes	I support progress made towards this issue but you should allow opting out of red waste as well as per the alternative proposals. Rates are already hefty for those of us who live in the inner city and on top of which you are charging us for a service we cannot/should not use. If we all opted in to red rubbish bins - the area around Welles Street/Dundas would become a mess of bins and a hazard. I understand putting the burden on those who can afford it, but all this does is further incentivize urban sprawl and that is incredibly inefficient - both from a council expenses perspective and climate change perspective. You should be encouraging density and charging extra for unused waste management services is against that.	No	Kyle Mazlin		
45933	Yes	I no longer live in a multi-unit complex, but I deliver mail in Riccarton where medium density housing is increasing, which is a good thing. I support medium density housing complexes having alternative options, especially if it means less bins on the footpath/kerb. I do worry about the effect of opting out on the costs for others who haven't opted out and are low-income households, so the balance seems right for now.	No	Fiona Bennetts		
45927	No	<p>I oppose the proposal because:</p> <ol style="list-style-type: none"> 1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins. 2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation. 3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection. 4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not? 5. There are ways that the Council could give a full refund and meet their objectives. <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>	No	Gillian Smeith		
45924	No	<p>I oppose the proposal because:</p> <ol style="list-style-type: none"> 1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins. 	No	Kieran Williamson		

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		<p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>5. There are ways that the Council could give a full refund and meet their objectives.</p> <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>				
45922	No	<p>Submission on Council's Annual Plan proposal to opt-out of the Waste Minimisation Targeted Rate</p> <p>██████████</p> <p>Name: Oylen and Vernon Payne</p> <p>████████████████████</p> <p>Email</p> <p>I wish to be heard at the hearings.</p> <p>I oppose the proposal because:</p> <p>1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p>	No	Oylen and Vernon Payne		

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		<p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>5. There are ways that the Council could give a full refund and meet their objectives.</p> <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>				
45901	Yes	<p>I oppose the proposal because:</p> <p>1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>5. There are ways that the Council could give a full refund and meet their objectives.</p> <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>	No	Areesa Chunsangfah		
45893	No	<p>I oppose the proposal because:</p> <p>1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with</p>	No	Nick Hutchinson		

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		<p>central city revitalisation.</p> <p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>5. There are ways that the Council could give a full refund and meet their objectives.</p> <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>				
45886	No	<p>I oppose the proposal because:</p> <p>1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>5. There are ways that the Council could give a full refund and meet their objectives.</p>	No	Kimberley Sewell		

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		If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.				
45879	No	<p>I oppose the proposal because:</p> <ol style="list-style-type: none">1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?5. There are ways that the Council could give a full refund and meet their objectives. <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>	No	Simon Chambers		
45876	No	<p>I oppose the proposal because:</p> <ol style="list-style-type: none">1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.2. The Proposal contradicts the Council's own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?5. There are ways that the Council could give a full refund and meet their objectives.	No	Alyn Hemens		

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		If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.				
45873	No		No	Belinda Clarke		
45871	Yes		No	Alanah Kauhou-Kenyon		
45869	No	<p>I oppose the proposal because:</p> <p>1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>5. There are ways that the Council could give a full refund and meet their objectives.</p> <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>	No	Vanessa Jones		
45865	No	<p>I oppose the proposal because:</p> <p>1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p>	No	Emily Miller		

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		<p>4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>5. There are ways that the Council could give a full refund and meet their objectives.</p> <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>				
45843	No	<p>I oppose the proposal because:</p> <p>1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>5. There are ways that the Council could give a full refund and meet their objectives.</p> <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>	No	Lynette Stenning		
45842	No	<p>I oppose the proposal because:</p> <p>1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p>	No	Phillip Stenning		

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45841	Yes	<p>Name Alyssia Zhang</p> <p>██</p> <p>████████████████████</p> <p>I wish to be heard at the hearings.</p> <p>I oppose the proposal because:</p> <p>1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>5. There are ways that the Council could give a full refund and meet their objectives.</p>	No	Alyssia Zhang		

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		If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.				
45837	No	<p>From:</p> <p>Chuan Law</p> <p>██████████</p> <p>██████████</p> <p>I wish to be heard at the hearings.</p> <p>I oppose the proposal because:</p> <p>1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>5. There are ways that the Council could give a full refund and meet their objectives.</p> <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>	No	Chuan Law		
45835	No	<p>I oppose the proposal because:</p>	No	Paerangi Matunga		

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		<p>It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>There are ways that the Council could give a full refund and meet their objectives.</p> <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>				
45833	No	<p>Submission on Council's Annual Plan proposal to opt-out of the Waste Minimisation Targeted Rate</p> <p>From:</p> <p>Zhen Jia</p> <p>████████████████████</p> <p>██████████</p> <p>I wish to be heard at the hearings.</p> <p>I oppose the proposal because:</p> <p>1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include</p>	No	Zhen Jia		

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		<p>all three bins.</p> <p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>5. There are ways that the Council could give a full refund and meet their objectives.</p> <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>				
45801	No		No	Mike Peers		
45793	Yes	<p>The Board supports giving people the opportunity to opt out of the targeted rate if they are not using the service.</p> <p>This support is on the basis that the opt-out will only be approved where appropriate equivalent services are in place.</p> <p>The Board expects that an opt-out would only be approved in situations where the Council service is not appropriate to meet the needs of the property. We have concerns about the potential for setting dangerous precedents for other Council services by developing opt-out policies.</p>	No	Bridget Williams	Waimāero Fendalton-Waimairi-Harewood Community Board	Chairperson
45771	Yes	<p>The Waipapa Papanui-Innes Community Board ('the Board') thanks the Council for the opportunity to submit on this consultation.</p> <p>The Board supports the proposed changes – with increasing intensification there is a need for practical alternatives to large kerbside clusters of individual units' bins.</p> <p>The Board considers that where alternative arrangements are made, monitoring is required to ensure adherence to their waste minimisation management plan.</p>	No	Emma Norrish	Waipapa Papanui-Innes Community Board	Chairperson
45758	No	We are opposing this as we still pay for red bins despite having our own rubbish collection service which we also pay for.	No	Lucienne Shelley		
45712	No	Hi, We are property Developers (Williams Corporation), some of our developments do not qualify for council waste collection, making private waste collection the only available option. In these situations, our owners should not have to pay for a private waste collection provider and pay for CCC date provider in their rates. This is a fair and reasonable amendment to be made for waste collection services or alternatively, council should collect all waste and not refuse some developments .	No	Chanaya Michaels	Williams Corporation Limited	Office Manager

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45635	No	I live in a multi-unit residential development, we don't use the City council services at all (including the most expensive rubbish one - red-), and I dont see why we should pay for this still given that we already pay for another company to remove all our rubbish. I would like to be able to completely opt out (yellow, green AND red).	No	Mathilde Vachon		
45523	No	I am grateful for the fact that our current rates would be reduced as we have been paying for a service we do not use and have to pay for in our BC levies - This is a system that works well both for us and would create an enormous amount of work if we were to use the smaller red bins for the council removal system. I have chosen to live in the city in a safe environment as being a single woman it is a great way to not feel alone and i am able to support as many of the local businesses around this regrowing city of which I am proud to be a part of. However the costs of rates is high and to pay for a service which we don't use is just wrong.	No	Jenni Snowdon	Self employed	
45516	No	Atlas doesn't use the facility thus saving the CCC the cost of collection plus they receive the money for the non-collection from us.	No	Max Lucas		
45508	Yes	This seems very sensible, for the reasons outlined :-)	No	Arthur McGregor		
45505	No		No	Heidi de Groot	Billing	
45492	No	The proposal is headed in the right direction but does not go far enough to correct a very obvious unfairness. Garbage rates should be a fee for service, not an opaque means of wealth redistribution. By the way, poor people live in high density housing too. Don't penalise high density efficient living by charging for a service that is not delivered. If you use a targeted rate for red bins, it would directly support your policy to reduce the amount of garbage going to land fill. Council should allow opt-out of ALL curbside collection for high density blocks with an approved alternative plan.	No	Matthew Seymour		
45486	No	I'm paying for bins twice, within my rates and within my Bodycorporate fees. Very annoying	No	James Longden		
45484	No	Hi. I actually submitted in favor earlier but would like to change my submission as I now understand it is only for green and yellow and not red bins. While its great that Council is considering removing our rates for yellow and green bins, this proposal also needs to include red bins. A couple of years ago, Council made the call encouraging residents to return to the city. We invested in Chch city and bought an apartment at Atlas Quarter. Since then, we've enjoyed the city life, watching new businesses return and have enjoyed supporting them in turn. We live in a medium/high density development reducing our impact on Council's infrastructure, including not using the Council's rubbish and recycling collection service. Council should, in good faith, be doing as much as possible to support those who are choosing to live in the central city. Council should absolutely not be charging us unfair council rates for services that we are not able to access.	No	Anne Glackin		
45388	No	I already have to pay privately for red, yellow and green bins as I own an apartment in the Atlas Quarter and do not see why I should pay for any of the bins through the council. Having 100+ council bins of each colour outside The Atlas Quarter is not practical.	No	Peter Morris		

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		Common sense should prevail here. Thanks, Peter				
45368	Yes	I think all multi unit complex that use commercial contractors should all get the capital value based rebate.	No	Liz Croxson	Pitcaithly Body Corporate Services Limited	General Manager
45329	Yes	I support the ability for multi-unit residential developments to opt-out of the Waste Minimisation targeted rate so they can take advantage of economies of scale to co-ordinate and share waste services among their residents.	No	Cameron Bradley		
45327	Yes	I would want to ensure that the changes to the wheelie bins do not increase the cost in any way if people are to keep the existing bin sizes.	No	Liam Chrisp		
45263	No	I believe we should not pay for the red bins as we do not have individual bins.	No	Kelly McLaughlin		
45261	No	I do not trust developers to sell this as a savings opportunity, and then have the residents start dumping their trash as maintaining a contractor will cost them money. There seems to be nothing in place to make sure the rubbish gets handled long-term, and not just as a once off when they opt out. The council should examine the possibility of giving extra sized bins to these properties to maximize storage space, or include in the local plan that new developments need to have space for these bins.	No	Karla Larsen		
45253	Yes	I support the proposal as long as waste definitely is collected by an approved alternative service.	No	Jean Flannery		
45251	No	Do you ever do anything else but look how you can make residents pay?? Maybe if the CEO took a pay cut - there is \$400,000 there without penalising anyone else.	No	Jennifer Lawrence		
45242	Yes		No	Sarah Wylie		
45196	Yes	It makes sense from a multi-tenanted complex perspective, reduces need to space at their end and on the footpath and provided the requirements for the complex ENSURE (which may have an element of active contract management - by CCC?) that proper recycling is occurring, it seems like a pragmatic decision all round.	No	Jill Borland		
45182	Yes	As we get more dense housing in the city (Yay!) dozens and dozens of bins along the curbside is a bit of a hazard. It means disposal trucks are in the streets longer (often narrow streets) and often the bins get blown or bumped into cycle ways or roads. This is a good change. However! I can easily see this as a way for development and rental companies to skimp out and not take care of the environment and city. Along with having a private service of equal (or better!) standards, the council should probably do an annual or bi annual checkup to make sure these developments are compliant. Or perhaps make it very simple (and private so there is no retaliation) for tenants to report non-compliance to the city for enforcement. It always looks bad when a big developer or someone skirts a council law and enforcement is lacking, slow, or a worthless slap on the wrist. Especially around environmental/climate type issues.	No	Philip Renich		

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		Thanks for continuing to improve things!				
45169	No	Why shouldn't all Christchurch rate payers be offered this option regardless of property type. This would potentially drive up costs to other ratepayers. These units are counted in the city councils 'average' for water usage etc so they should be treated the same in all areas.	No	Jen Anderson		
45168	No	It will impact on the other residents in the street (or the complex if not all residents choose the option). What will SURELY happen is that those who have opted out will maybe sign up with a contractor just to "prove" to CCC that have one, and then they will simply put their waste in their neighbours' bins! How big is a "large multi-unit development" anyway? And who makes the decision - the developer, the body corporate, the individual residents? This is a very short-sighted proposal. Why is council even thinking of this? I think there is an ulterior motive!	No	Beverley Nelson		
45159	No	As a residential property owner who would have (given the chance) strongly objected to 6 units going up on a residential section, because of 1. Impacts in terms of privacy, 2.noise 3.lack of light and 4. closeness to other properties, as built almost to the fence, we have now ongoing problems with bins on the front of the units, not in areas intended at the back. As this is a cash cow, owned by Harcourts at Oxley and has caused over a year of disruption to neighbours, other residents, I object strongly to such 'developmentd' effectively putting further burdens on ratepayers, if this proposal goes ahead.	No	Jules Venning		
45158	Yes	One of the big advantages of multi-unit developments is the ability to share things so yes I feel it is good to allow them to sort out their own plans that will take advantage of this.	No	Cameron Bradley		
45156	Yes		No	Peter Morrison		
45129	Yes	Moving rubbish to the targeted rate and therefore being able to opt out of all 3 would make more sense though.	No	Mitchell Davies		
45124	Yes	This a fair approach , and supports apartment rate payers, who subsidize other ratepayers through their ineffective land use.	No	Tim Allan		
45123	Yes		No	Anne Glackin		
45114	Yes	Opt out would be my preference we take our rubbish away with us.	No	Sid McAuley	Coolpak Coolstores Ltd	Managing Director

Submission ID	Do you support the proposed changes?	Comments - Please be as specific as possible to help us understand your views	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
45923	No	<p>Do not agree to paying for a red bin service we don't receive...imagine your trucks collecting aprox 100 red bins from Welles St every fortnight. It would be chaos!</p> <p>We have our own very efficient 4 bin system of which you will be totally aware.</p>	Yes	Jeni Neilson		
45918	No	<p>Because it is only a partial solution, is not fair, it is inconsistent with the Council's stated policy objectives, and the reasons for excluding the red bins and waste disposal costs do not stack up. See attached submission.</p>	Yes	Richard Ball	Atlas Quarter Body Corporate Inc.	Chairman
45907	No	<p>I oppose requiring owners who opt out of kerbside collection to still pay for red bins via their general rate. This is unfair. The only workable options are:</p> <ol style="list-style-type: none">1. A targeted rate for red bins based on capital value, charged only to owners who use the kerbside collection service.2. A red bin rebate for owners who have opted out of kerbside collection.3. Provide communal bins to large residential developments so they don't need to pay for private rubbish collection services. <p>All 3 options are fair, and avoid redistribution of rates from higher-value properties to lower-value properties. Options 1 and 2 provide much-needed transparency around the cost of rubbish collection.</p> <p>Notwithstanding the above, I support removing the Waste Minimisation Targeted Rate for those who have opted out of kerbside collection.</p> <p>Fletcher Living first raised these issues with Council in 2015. That a comprehensive solution has still not been designed in 2022 is unacceptable. We need a mechanism that promotes inner-city living and eliminates all double-charging on household waste. Now is not the time for a long-delayed interim measure. Now is the time for a comprehensive solution. Residents of Atlas Quarter have been unfairly double-charged for their rubbish for almost four years, costing each resident many hundreds of dollars.</p> <p>Please note that as an inner-city resident without a carpark the EcoDrop recycling centres are completely inaccessible to me. If I am to pay for these then I would expect the EcoDrop service to include a scaled-down inner-city recycling centre to reduce the number of household appliances and furnishings going to landfill.</p> <p>As the new chair of the Atlas Quarter body corporate, and as a long-standing committee member responsible for our waste minimisation comms, I am concerned about the requirement to "complete a waste management plan". My role is completely</p>	Yes	Mark Darbyshire		

Submission ID	Do you support the proposed changes?	Comments - Please be as specific as possible to help us understand your views	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
		voluntary and takes up a lot of my time. My role has been hard enough, with no support from Council or Envirowaste in my efforts to promote correct use of our bins. The extra burden to develop a waste minimisation plan seems disproportionate. All that is required is proof that we have the correct bins, and support from Envirowaste or Council to provide effective educational posters and pamphlets.				
45878	No		Yes	Alan Steel		
45867	No	<p>From:</p> <p>Tim Jamieson</p> <p>██████████</p> <p>██████████</p> <p>I wish to be heard at the hearings.</p> <p>I oppose the proposal because:</p> <p>1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>5. There are ways that the Council could give a full refund and meet their objectives.</p> <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>	Yes	Tim Jamieson		
45864	No		Yes	Deborah Bowker		
45863	No		Yes	Deborah Bowker		

Submission ID	Do you support the proposed changes?	Comments - Please be as specific as possible to help us understand your views	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
45862	No	<p>Submission on Council's Annual Plan proposal to opt-out of the Waste Minimisation Targeted Rate</p> <p>I wish to be heard at the hearings.</p> <p>I oppose the proposal because:</p> <ol style="list-style-type: none">1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?5. There are ways that the Council could give a full refund and meet their objectives. <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>	Yes	Denis DUMAINE		
45848	No	<p>I oppose the proposal because:</p> <ol style="list-style-type: none">1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?	Yes	Clair Higginson		

Submission ID	Do you support the proposed changes?	Comments - Please be as specific as possible to help us understand your views	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
		<p>5. There are ways that the Council could give a full refund and meet their objectives.</p> <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>				
45845	No	<p>I oppose the proposal because:</p> <p>1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>2. The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?</p> <p>5. There are ways that the Council could give a full refund and meet their objectives.</p> <p>If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.</p>	Yes	Gillian Gray		
45834	No	<p>I oppose the proposal because:</p> <p>It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.</p> <p>The Proposal contradicts the Councils own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.</p> <p>The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.</p> <p>The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income</p>	Yes	Julian Kirwan		

Submission ID	Do you support the proposed changes?	Comments - Please be as specific as possible to help us understand your views	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
		households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not? There are ways that the Council could give a full refund and meet their objectives. If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.				
45810	No	We shouldn't pay for red bin disposal if not using it. The cost to low income residents could be dispersed to larger land owners which is not likely to be low incomers.	Yes	Faye Greenwood		
45799	No	It's not fair that we have to pay TWICE for red rubbish collection (we have our own private waste collection service). Makes no sense for council to provide rates relief for green and yellow bin charges, but still charge for the red bins (the most expensive one)! The councils reasons for this sound false/ridiculous. Opt-out should apply to ALL bins. Council supposedly supports multi unit development and inner city densification, but this red bin charging flies in the face of that. We are being penalised (heavily) for councils lack of fair policy. The councils proposal is neither fair nor transparent. It only goes half way. This has been going on since 2015, costing large developments like ours tens of thousands of dollars extra EACH YEAR (to pay for two separate waste collection services). The council has wasted enough time over this and should charge fairly for use of rubbish services.	Yes	Martin Rumbold		
45519	No	At the moment, we pay twice for the waste, including the red bins, there is no reason why we should pay the council for a service that it does not provide. This system penalizes residents who live in higher density developments like ours. The Council says it wants to encourage living in the Central City but is making us pay twice for waste. In reality, we are subsidizing red bin rubbish collection for the rest of the City when the Council says it wants to reduce red bin waste. Why would you subsidize something you want less of? It is neither fair nor transparent. To date the Council has been unable to tell us how much we are paying through general rates for the red bins.	Yes	Eleonore Dumaine		
45504	No	I would like to discuss why we want to opt out of all 3 bins. We do NOT want to continue paying for red bins!	Yes	Kirsty Stewart		
45358	No	Rates mean everyone pays their share	Yes	Kevin McSweeney		

Submission #45862

Submission on Council's Annual Plan proposal to opt-out of the Waste Minimisation Targeted Rate

From:

Name



I wish to be heard at the hearings.

I oppose the proposal because:

1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.
2. The Proposal contradicts the Council's own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.
3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.
4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?
5. There are ways that the Council could give a full refund and meet their objectives.

If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.

Submission #45878

Submission on Council's Annual Plan proposal to opt-out of the Waste Minimisation Targeted Rate

From:

Alan Steel



I wish to be heard at the hearings.

I oppose the proposal because:

1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.
2. The Proposal contradicts the Council's own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.
3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.
4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?
5. There are ways that the Council could give a full refund and meet their objectives.

If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.

Submission #45771

12 April 2022

Annual Plan Submissions
Christchurch City Council
PO Box 73017
CHRISTCHURCH 8154

Christchurch
City Council 

Papanui Service Centre
5 Restell Street
Christchurch 8013

PO Box 73024
Christchurch 8154

ccc.govt.nz

Tēnā koe,

Waipapa Papanui-Innes Community Board Submission on Opting out of Kerbside Collection and Targeted Rate

1. Introduction

The Waipapa Papanui-Innes Community Board ('the Board') thanks the Council for the opportunity to submit on this consultation.

2. Submission

The Board supports the proposed changes – with increasing intensification there is a need for practical alternatives to large kerbside clusters of individual units' bins.

The Board considers that where alternative arrangements are made, monitoring is required to ensure adherence to their waste minimisation management plan.

Nāku noa, nā

Emma Norrish
Chairperson
Waipapa Papanui-Innes Community Board
Christchurch City Council

Email: Emma.Norrish@ccc.govt.nz

Submission #45893

Submission on Council's Annual Plan proposal to opt-out of the Waste Minimisation Targeted Rate

From:

Nick Hutchinson



I wish to be heard at the hearings.

I oppose the proposal because:

1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.
2. The Proposal contradicts the Council's own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.
3. The proposal is not transparent. The Council has not provided any information on how much we pay in general rates for rubbish collection.
4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low income households to include the red bins in the Targeted Rate but that reasoning does not apply to the yellow and green bins. Why not?
5. There are ways that the Council could give a full refund and meet their objectives.

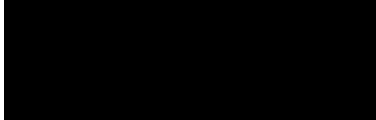
If the Council is unable to change the proposal, then implement the opt out and direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.

Submission #45918

Submission on Christchurch City Council's Annual Plan proposal to opt-out of the Waste Minimisation Targeted Rate

10 April 2022

From: **Atlas Quarter Body Corp inc.**
c/o Richard Ball



We wish to be heard at the hearings.

Summary

We oppose the proposal because:

1. It is only a partial solution to the issue. Developments such as the Atlas Quarter would still pay for the red bins. It should include all three bins.
2. The Proposal contradicts the Council's own policy objectives. It does not promote waste reduction and it does not align with central city revitalisation.
3. The proposal is not transparent or fair. Council staff have not provided information on how much we pay in general rates for rubbish collection (despite being asked three times over the last 2 years).
4. The reasons given for not providing a full refund do not stack up. The Council says that it would be unfair for low-income households if red bin costs were included in the Targeted Rate, but the same reasoning is not being applied to the yellow and green bins. Why not?
5. There are ways that the Council could give a full refund and meet their objectives which do not appear to have been considered.

We request that the Council amends its proposal to include the costs of the red bins and relevant waste disposal costs.

If the Council is unable to change the proposal, then we ask that the existing opt out proposal is adopted and that the Council direct staff to develop a solution that is fair, transparent and aligns with the Council's policy objectives for inclusion in the next Annual Plan.

Context

The Atlas Quarter is a 113 unit development in Welles Street, Central Christchurch. For practical reasons we are unable to use the Council's three bin system and have to arrange for private collection of all waste. This includes all the same waste streams as the Council provides.

Since opening in 2018, we estimate that Atlas Quarter owners have paid around \$160,000 for kerbside waste collection (\$40,000 per year). We don't know exactly how much because the Council can't tell us – despite my requesting this information on three separate occasions over the last 2 years. The same issue affects many other multi-unit developments like ours.

Submission #45918

Reasons for opposing the opt-out proposal

1. It is only a partial solution. We would continue to pay for all the red bin kerbside collection and solid waste disposal.
2. The reasons given for excluding red bins from the proposed opt out does not stack up. The only alternative only option the Council considered was to add the red bin cost to the Targeted Rate for the whole of Christchurch. This was rejected this as it would mean lower income households would pay more and wealthy households would pay less. If that is the reason:
 - Why does this only apply to the red bins? Why does Council have a different system for the yellow and green bins?
 - Why did Council not consider other ways to ways to remove the red bin charges that would not have income or wealth impacts? If Council want to address income and wealth issues, then do that. But do it transparently and do not use that as an excuse for inaction.
3. To be eligible for the opt out, we must provide a system that covers all waste (rubbish, recycling and greenwaste). But the Council applies a different standard when it comes to rates relief. They want us to keep paying them for the most expensive part: general rubbish. (The charges on the EcoDrop website are: general waste \$294.45/tonne and greenwaste \$115.10/tonne. Recycling is free.)
4. The proposal contradicts the Council's own objectives:
 - It penalises residents who live in higher density developments like ours. The Council says it wants to encourage living in the Central City but is making us pay twice for waste.
 - It means we are subsidising red bin rubbish collection for the rest of the City when the Council says it wants to reduce red bin waste. Why would you subsidise something you want less of?
 - It is neither fair nor transparent. To date the Council has been unable to tell us how much we are paying through general rates for the red bins. There is no transparency when they cannot even tell us how much we pay.

Relief Sought

We ask that the Council develops a solution that includes an opt-out or rebate for all the relevant costs associated with the 3 bin system, including red bins and the cost of rubbish disposal (which we pay for in fees at the transfer station).

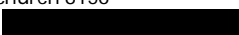
If the Council cannot adopt a comprehensive solution that includes the costs of the red bins and waste disposal, then we ask that the existing proposal be adopted as an interim solution and staff are directed to develop a full and fair solution for inclusion in next year's Annual Plan.

Richard Ball
Chairman, Atlas Quarter Body Corporate

Submission ID	Do you have any comments on the proposed new policy on Māori Freehold Land? Please be as specific as possible to help us understand your views	Yes, I would like to speak to the Hearings Panel about my submission	Name
45979	We note with approval the following policies, programmes and projects: The changes in Maori land rating.	No	David Close
45978	Very pleased to see that rates remissions are being considered for Maori whenua.	No	Kay Robertson
45776	If the land is unused and is maintain in a way that native fauna and flora is allowed to grow. It should have to pay rates. If it is poorly maintained land that may need council intervention due to safety (fire risk). Then there should be some account for cost.	No	Hayden Kennedy
45525	Since pākahā domination of Aotearoa from the 1850s onwards, Tangata Whenua have historically suffered multiple impediments to 'developing' their land in a manner that suits Te Ao Māori. For this reason, as a 5th generation elder and inhabitant of British settler descent, I fully support the remission of rates to enable the building of strong economic positions for Tangata Whenua in their own country.	No	Lizzie Cook
45514	I don't agree with these changes. From what I understand if they do nothing with the land then that's ok? And. you propose in stopping all rates on it? The council currently pays the rates? What earth is going on here? This is reverse racism. If a person/group/whatever owns land then they should be paying - regardless. If you aren't doing this for other people/races then why are you "proposing" on doing this for maori? So, does this mean that ALL of the rate payers are going to get lumbered with more fees to pay for their rates? This is wrong. Regardless of your race you should be paying like everyone else has to.	No	S C
45200	Support development of a new policy in line with legislation.	No	Jill Borland
45138	What a load of cods wallop!! It would appear to me that it would cost the CCC more in time and effort than the rates are worth so whats the point, mind you \$94,000 in rates for land worth \$38,000,000 doesn't seem right to me either even if all the land is undeveloped.	No	Frank Donald Pankhurst
45109	This is apartheid. Before just diminishing that statement go look it up. Different rules for minority races. We are ALL Kiwi.	No	Warren Buffet

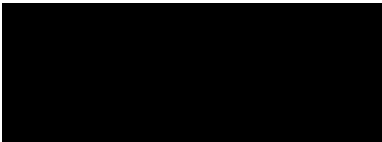
Submission ID	Do you have any comments on the proposed new policy on Māori Freehold Land? Please be as specific as possible to help us understand your views	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
45840		Yes	Megen McKay	Mahaanui Kurataiao Limited	Senior Advisor
45831	Te Pātaka o Rākaihautū Banks Peninsula Community Board Submission	Yes	Tori Peden	Te Pātaka o Rākaihautū Banks Peninsula Community Board	Chairperson

Submission #45831

To: Christchurch City Council
PO Box 73017
Christchurch 8156
Email: 

Submission On: Proposal for a New Policy on Māori Freehold Land

By: Te Pātaka o Rākahautū Banks Peninsula Community Board

Contact: 

Date: 28 March 2022

1. INTRODUCTION

The Te Pātaka o Rākahautū/Banks Peninsula Community Board (the "Board") appreciates the opportunity to share its feedback with the Christchurch City Council on the proposal for a new policy on Māori Freehold Land.

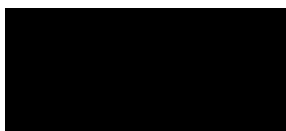
The Board's statutory role is "to represent, and act as an advocate for, the interests of its community" and "to prepare an annual submission to the territorial authority for expenditure within the community" (Local Government Act 2002, Section 52). The Board is providing this submission in its capacity as a representative of the communities in the Banks Peninsula Ward – Akaroa, Ōhinehou Lyttelton, Te Waipapa Mount Herbert, and Wairewa Little River.

2. SUBMISSION

The Board is pleased to support the Council's proposal to update its policy on Māori freehold land to reflect the amendments made to the Local Government Act 2002 and the Local Government (Rating) Act 2002. The Board recognises that nearly all of the 163 rating units of Māori freehold land in the Christchurch City Council takiwā are located in the Banks Peninsula Ward, and believes the updated policy will better enable the Council to respond to the differences in ownership and use of Māori freehold land and encourage long term retention.

The Board believes that the 2021 legislation amending the Local Government Act 2002 and the Council's proposal to align its policy with the new requirements reflects the spirit of Te Tiriti o Waitangi and supports the principles set out in the Preamble to Te Ture Whenua Māori Act 1993. These changes are a reflection that land is a taonga tuku iho of special significance to Māori, and the Board fully supports the policy's goal of promoting the retention of that land in the hands of its owners, their whānau and their hapū.

Yours sincerely,



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



14 April 2022

Tēnā koe,

POLICY ON REMISSION AND POSTPONEMENT OF RATES ON MĀORI FREEHOLD LAND

Summary

- [1] This is a submission by Te Ngāi Tū Ahuriri Rūnanga, Te Hapū o Ngāti Wheke (Rāpaki), Te Rūnanga o Kōkourārata, Wairewa Rūnanga, Te Taumutu Rūnanga and Ōnuku Rūnanga (together “Ngā Rūnanga”) regarding the draft ‘Policy on Remission and Postponement of Rates on Māori Freehold Land (“the Policy”)’. The Policy arises from the recently passed Local Government (Rating of Whenua Māori) Amendment Act 2021 (“the Amendment Act”).
- [2] Ngā Rūnanga support the spirit of the Policy but oppose the text of the Policy because of the reasons set out below. Appended to this submission are some alterations to the Policy Ngā Rūnanga submit will make the Policy workable from a tangata whenua perspective.
- [3] Ngā Rūnanga submit any decisions relating to the rating of Māori Freehold Land (“Māori land”) in the takiwā of Ngā Rūnanga must be made in full consultation and co-operation with Ngā Rūnanga.¹ To do this, Ngā Rūnanga submit Te Hōhonga Council – Papatipu Rūnanga Committee (“the Committee”) be given full decision-making power in relation to the rating of Māori land in its takiwā.
- [4] Ngā Rūnanga also submit any rates taken on Māori land in Ngā Rūnanga takiwā should be transferred to a ‘Ngāi Tahu Rates Commission’ which will then invest those rates back in the Māori communities the money is taken from.

Background

- [5] Ngā Rūnanga are the tangata whenua of the territory of the Christchurch City Council (“CCC”).
- [6] As tangata whenua, Ngā Rūnanga hold enduring and immutable tino rangatiratanga, past, present and future within their takiwā (territory).
- [7] The rangatiratanga of Ngā Rūnanga was recognised and endorsed by the Crown in Te Tiriti o Waitangi and the Ngāi Tahu Claims Settlement Act 1998 (see sections 5(7) and 6(7)).
- [8] The Policy relates to Māori land that sits in the territory of the CCC. There are 159 known rateable units of Māori land rated by the CCC. Many of these land parcels are located close to, or associated with, the marae at Rāpaki, Kōkourārata, Wairewa and Ōnuku.
- [9] There are 42 known rateable units of Māori freehold land made general land by the Māori Affairs Amendment Act 1967 (“1967 land”) which are rated by the CCC. Similarly, these are mostly land parcels associated with the marae of Ngā Rūnanga. [These units are mapped at Appendix Two].

¹ See s 6 (8) Ngāi Tahu Claims Settlement Act 1998.



Mahaanui
Kurataiao Ltd
Manawhenua Environmental Services

- [10] The rateability or otherwise of Māori land in the territory of the CCC is therefore directly connected to the wellbeing of the communities of Ngā Rūnanga.

Landowners

- [11] This submission is made on behalf of Ngā Rūnanga but does not necessarily represent the views of the landowners affected by the Policy.
- [12] Ngā Rūnanga note that to the best of their knowledge CCC has not engaged directly with the landowners of Māori land in the CCC boundaries. Ngā Rūnanga submit CCC should be working directly with the landowners of Māori land in the CCC boundaries to understand the views of those landowners.

Objection to the Policy

- [13] The central concern of Ngā Rūnanga is the current iteration of the Policy does not recognise and provide for the rangatiratanga of Ngā Rūnanga. The Policy does not fulfil the obligations of the CCC under Te Tiriti o Waitangi.
- [14] There is no decision-making provision for Ngā Rūnanga under the policy. All the decisions made in relation to land that has been owned by tangata whenua for hundreds of years are made by the CCC. The Policy is void of a substantive Tiriti Partnership.
- [15] Despite the clear guidance of Cabinet Circular (19) 5, this Policy does not meet the good faith obligations of the Crown as tangata whenua have not had a role in the design of the Policy, nor does the Policy allow for exercise of rangatiratanga while recognising the right of the Crown to govern.

Detailed submission

Introduction

- [16] Ngā Rūnanga submit the introduction to this policy is lacking a section on the relationship between Ngā Rūnanga and the land in their takiwā. This is the appropriate section to acknowledge the rangatiratanga of Ngāi Tahu Papatipu Rūnanga as tangata whenua, and the Tiriti Partnership between Ngā Rūnanga as tangata whenua and the CCC. A proposed additional section is appended at Appendix One.
- [17] Ngā Rūnanga submit that it is important to note the Ngāi Tahu Claims Settlement Act 1998 applies to the territory of the CCC. A proposed additional section is appended at Appendix One.

Land to which this policy applies

- [18] This section of the policy outlines the land to which the policy applies. Ngā Rūnanga submit that this would be an appropriate section of the policy to outline that Ngā Rūnanga are Rangatira of the land in question. A proposed additional section is appended at Appendix One. This proposed additional section should be the very beginning of this part of the policy.



Mahaanui
Kurataiao Ltd
Manawhenua Environmental Services

Policy objectives

- [19] Ngā Rūnanga submit that the Policy objectives should include recognition of the tangata whenua status of Ngāi Tahu Papatipu Rūnanga. A proposed additional section is appended at Appendix One.

Conditions and criteria for postponement or remission of rates

- [20] Ngā Rūnanga submits this section in its current form is inappropriate. Specifically, the CCC should not hold sole discretionary decision-making authority in relation to the rating of Māori Land in the takiwā of Ngā Rūnanga.
- [21] Ngā Rūnanga submit that any decisions relating to the rating of Māori land in the takiwā of Ngā Rūnanga must be made in full co-operation with, and giving effect to the views of, Ngā Rūnanga. From a practical perspective this can be undertaken through the Committee. An additional section to this effect is appended at Appendix One.

Conditions

- [22] Ngā Rūnanga submit the discretionary elements of this section of the policy are inappropriate for the reasons outlined above.

Missing sections

- [23] The Amendment Act has additional empowering provisions relating to the rating of Māori land that are not include in the Policy.
- [24] Section 20A of the Amendment Act allows for a person to apply to a local authority if they use two or more rating units of Māori freehold land to treat these as one rateable unit. The Policy does not include an empowering provision regarding this section, and Ngā Rūnanga submit that the Policy should be updated to include such a section.
- [25] Section 98A of the Amendment Act allows for a separate rating area to be split off from another rating unit on Māori freehold land if there is a dwelling separate from the other land (for example in papa kāinga developments). The Policy does not include an empowering provision regarding this section, and Ngā Rūnanga submit that the Policy should be updated to include such a section.
- [26] Section 62A and section 65 of the Amendment Act apply to 1967 land. The Amendment Act now means that if rates have not been paid for more than three years and the owner of the land is dead, unknown, or cannot be found, the person actually using the land will be charged rates. The Policy does not include any empowering provision relating to the rates collected on 1967 Land, and Ngā Rūnanga submit that the Policy should be updated to include such a section.
- [27] As with the appended specific additions to the Policy, Ngā Rūnanga submit that any decisions relating to the missing sections of the Amendment Act must be undertaken by the Committee.



Rates Commission

- [28] While on face value, it may appear that not rating Māori land is a good thing for those owners, the flow on effect is that this confirms Māori land as 'dead capital', or land that is risky to invest on or use as security for investment and lending.
- [29] Māori land as 'dead capital' is an ongoing issue. MR873 is a key example of this, albeit not in the CCC territory. The reserve is ringed by Woodend, Rangiora and Kaiapoi and the commercial developments in those neighbourhoods. However, MR873 has never attracted the same level of commercial development and investment, primarily because of this issue of 'dead capital'.
- [30] To encourage development in Māori Reserves and other areas of significant Māori landholdings in the takiwā of Ngā Rūnanga, a tool for overcoming this issue of 'dead capital' and unleashing the economic potential of the land is needed.
- [31] Ngā Rūnanga submits that one such tool could be the establishment of a Ngāi Tahu Rates Commission. The CCC would transfer rates collected on Māori land in its boundaries to the Commission. The Commission would then reinvest rates collected on infrastructure and development projects within the Māori Reserves in its boundaries.
- [32] Information provided by the CCC indicates that \$88,886.54 of rates were collected on Māori land and \$54,115.89 of rates were collected on 1967 Land by the CCC for the 2021/2022 period. While a small part of the total rates pool of the CCC, this is a significant amount of money for the communities of Ngā Rūnanga. Ngā Rūnanga invite CCC to set a hui to discuss how that \$143,002.43 can be reinvested back into our communities.

Conclusion

- [33] Ngā Rūnanga submit that the Policy can be easily amended per its suggested additions in order to achieve a meaningful Tiriti Partnership and effective Policy.
- [34] Ngā Rūnanga is available to speak to this submission at the Hearing. Please contact Megan McKay [REDACTED] to arrange.

Nāku, nā,



Appendix One – Proposed Additional Text

Ngā Rūnanga submit the following text should be added to each section of the Policy.

Introduction

Add:

Ngā Rūnanga are tangata whenua of the area under the control of the CCC. As tangata whenua, Ngā Rūnanga hold tino rangatiratanga, past present and future. This rangatiratanga is immutable and has been acknowledged by Te Tiriti o Waitangi and the Ngāi Tahu Claims Settlement Act 1998.

Ngā Rūnanga and the CCC enjoy an active Tiriti Partnership underwritten by the Principles of Te Tiriti o Waitangi.

Ngā Rūnanga are Rangatira of all Māori Freehold land in the CCC area and as such, the CCC will co-operate with, and give effect to the views of, Ngā Rūnanga in carrying out this policy.

The Ngāi Tahu Claims Settlement Act 1998 applies to the territory of the CCC.

Land to which this policy applies

Lead this section with:

All land in the territory of the CCC comes under the takiwā of Ngā Rūnanga who hold rangatiratanga over all the land in question.

Policy objectives

Add:

To recognise the rangatiratanga of Ngā Rūnanga over the land within CCC boundaries.

Conditions and criteria for postponement or remission of rates

Remove:

"Rates relief under this Policy is granted entirely at the discretion of Council"

Add:

All decisions relating to Māori Freehold Land will be referred to Te Hohonga Council – Papatipu Rūnanga Committee as part of its usual workplan for consideration. A decision will be made by consensus of that Committee and that decision will be final.

The Council will not have sole discretionary decision-making power of the rating of Māori Land in the takiwā of Ngā Rūnanga.



Conditions

Remove:

"at its discretion"

Add:

"in consultation with Te Hohonga Council – Papatipu Rūnanga Committee"

Item 3

Attachment G

SubmissionID	Do you support the proposal to extend the three-bin kerbside collection to all serviceable roads in Wairewa?	Do you have any comments about the proposal?	Yes, I would like to speak to the Hearings Panel about my submission	Name
45512	No	<p>I strongly oppose the provision of bins to Birdlings Flat. My primary reason is that bins being blown about, not just blown over, by the very high winds we experience here. I have some bins on my property which, even when half full, get blown about this property. Recently an iron ornamental chair was blown off my deck. Lid clips will not ensure bins not rolling along the road, and at 83 years old, I do not welcome the prospect of chasing them along the road. I have lived here for many years so have had much experience of how ferocious the winds here can be. I find the current collection system practical and convenient. Please refrain the Birdlings Flat Transfer Station.</p> <p>Please also retain the recycling bins at Little River, they are a welcome convenience for locals and others.</p>	Yes	Mary Kamo
45509	Yes	<p>The extension up Okuti does not go far enough.</p> <p>1)from a land use perspective, the 3 bin collection should go another 500m up the road so that it would then get the additional smaller lifestyle blocks that all occur between the Reynolds Valley turnoff where it is proposed to terminate, and the Okuti reserve turnaround.</p> <p>2) changing from reynolds to the sealed turnaround at the reserve up the road if far safer from a traffic safety perspective, and for this reason the school bus has changed from reynold (with its blind corners) to the reserve (which has far more space and is safer to turn around.</p> <p>3)a save in CO2 ommisions. As CCC has its own sustainability policy and has signed on to intenational climate accords, reducing carbon footpprint should be a priority- which it is for residents in this valley. As per the attached, there are 6 lifestyle size properties that front okuti between the proposed stopping point at reynolds and the new suggested reserve turnaround point. This one rubbish truck and its omissions over what I expect would be a 5minute addition to the journey, would save5 vehicles and their emmissions from being produced, having to drive all the way to the birdlings flat depot- a 20min round trip (5 x 20min= 1hr 40mins of driving and emissions instead of 5mins). This is a no brainer- we understand that there are some rurally zone larger blocks of land further up the valley that may not be efficient for CCC to pick up and there are few spots to turn around safety further up the valley. but the currently proposed stopping point at reynolds is unsafe, and makes limited sense given a better turning point and smaller lifestyle blocks occur in the 500m gap between reynolds and the reserve turn around.</p> <p>My neighbours agree- I have asked them. Do they need to submit or is my submission enough? its fairly clear from my plans, even from canterbury maps, the additional lad holdings/ dwellings I m talking about... thanks</p> <p>We ask that you consider this minor change- it will be very much appreciated.</p> <p>I ask that you would consider</p>	Yes	Jade McFarlane
45444	No	<p>First I went on the have your say website and it does not exist or cannot be found? I cannot see the worth of placing 3 bins at my house, we do not create that amount of rubbish or recycling and as others have said, Birdling's Flat has at times high winds not like Little River, and bins left out for various reasons will be blown all over the place. Hillview and Coates Roads are not wide enough for bins to be left out as there are not footpaths and the edges of the roads will not stand a big trick running along the edge, the roads are in an imploring condition, holes as well as continued broken edges.</p> <p>The council does not say if the transfer station at Birdlings Flat will remain open, what do the residents do with general rubbish that does not fit in the bin? Large green waste shrubs and tree cuttings, large whiteware, stoves, fridges or washing machines. What about general metal recycling? The Birdlings Flat Transfer Station must be kept going for Saturday collection.</p>	Yes	Vince and Colleen Burke

SubmissionID	Do you support the proposal to extend the three-bin kerbside collection to all serviceable roads in Wairewa?	Do you have any comments about the proposal?	Yes, I would like to speak to the Hearings Panel about my submission	Name
		I do not need or want 3 bins.		
45139	No	I do not support the current area mapped- The CCC asked for feedback a while ago -and have not listened. The homes included in Okuti Valley road, where we live- have our neighbours included- but there is no turn around outside their homes and the truck would have to pass our place [REDACTED] to turn around. How is it that the yellow bins can be picked up but not red or green. Was there a site visit? There is a turn around area at the end of the road - the map makes no sense and I doubt there was even a site visit. I'd like someone to explain this please.	Yes	Marcus Puentener

Submission ID	Do you support the proposal to extend the three-bin kerbside collection to all serviceable roads in Wairewa?	Do you have any comments about the proposal?	Yes, I would like to speak to the Hearings Panel about my submission	Name
45947	Yes	See attachment	No	Stephen Belchef
45668	No		No	L Pickering
45667	No	Roads at Birdlings Flat are narrow and do not have foot paths or kerbs as such. Trucks already have issues getting up and own our roads especially Hillview and Coates Road. If bins fall over, is this not a risk for all drivers then as said our roads are very narrow and the considers are not very safe. At the end of Hillview road all of the road has not even been as plated - we got missed out!!! This round about with 5 houses on it is actually Hillview Road so how do we get on? We have no street lights, bins may become a hazard for walkers at night.	No	Lesley Burke
45666	No	I want the existing to progress. I use refuse on once a month as there is no need as part of recycling. I use weekly for recycling. It is a good proximity for green waste and dont mind paying for an alternative which is Parkhouse Road - 30 minutes away. I live in a very windy area where whole bins have become a hazard if they are left empty. I would only use one bin for recycling. Your green bins are inadequate for my use and for what it offers.	No	Doug Coxall
45665	No	With very little rubbish from [REDACTED] Birdlings Flat. There is absolutely no need for kerbside bins	No	P M Sitarz
45663	Yes	If this proposal doesn't proceed can the Council please upgrade the Transfer Station at Birdlings Flat so it is open 7 days a week, like the one at Duvauchelle where you can access it easily. It has been very difficult to dispose of our household rubbish and recycling when the transfer station is only open Saturday mornings from 9 - 12. Weekends are busy enough.	No	Jane Cooke
45660	Yes	I live on [REDACTED] Every Saturday morning the rubbish truck drives past my house to the Birdlings Flat tip 2km away. I then have to follow the truck, usually stressing out because we have to wait for the top to open before we go to Saturday morning sports. I drive 2km each way to drop off rubbish to a truck that is usually parked at the end of my street. It makes no sense to have all of the residents of Birdlings Flat drive to the top when the contract holder lives in the settlement.	No	Gina Coatsworth
45622	Yes		No	Tim O'Connor
45621	Yes	There is no justification for the cost of collecting and disposing red bin waste to be tied to the capital value of each property. It does not cost more to deal with the same amount of trash because it came from a property with a higher capital value. For example, someone with a lower valued property can have more rubbish. "The cost of collecting and disposing of rubbish (red bin) is recovered through Council's general rate, which is based on the capital value of each property."	No	Andrea O'Connor
45532	Yes	We live in the Gebbies Valley area and strongly support the proposed red and green bin collection to add to our current yellow bin collection. At present we have to travel 18km on a Saturday morning to dump our rubbish which is very frustrating.	No	Megan Baker
45489	Yes	If this proposal does not proceed, can the council please upgrade the transfer station at Birdlings Flat so it is open 7 days a week, like the one at Duvauchelle where you can access it easily. It has been very difficult to dispose of our house hold rubbish and recycling when the transfer station is only open Saturday morning from 9 - 12. Weekends are busy enough. Thanks	No	Jane Cooke
45488	No	My proposal would be to upgrade the Birdlings Flat transfer station in a similar fashion to the one at Barry's Bay or Pigeon Bay - a walk in only facility that is not staffed. At present many locals drive to the Barry's Bay transfer station to dispose of their waste there. This is inefficient, both economically and environmentally as it is out of the way for most locals. This costs time and petrol. Most Wairewa residents go regularly to Christchurch anyway so a self service transfer station at Birdlings Flat would make much more sense. Your consideration is appreciated.	No	Thomas Finger
45487	Yes	I am 88. Would be wonderful to have bins at the gate	No	Pam Young
45465	Yes	- Strongly support for Birdlings Flat - Can be hard to make 9 - 12 when juggling commitments	No	Alison Walker
45464	No	Leave as it, no need for change	No	Ross & Mary Millar
45463	No	I do not support the proposal to extend the kerbside collection extension due to the distance between many properties on the serviceable roads. Petrol prices are only going to continue to increase & the current system is working. The property I own [REDACTED] would only have less that ten properties and would take a collection truck to drive a while to go up and back a dead end road.	No	Andrew Kendall

Submission ID	Do you support the proposal to extend the three-bin kerbside collection to all serviceable roads in Wairewa?	Do you have any comments about the proposal?	Yes, I would like to speak to the Hearings Panel about my submission	Name
45462	Yes	Need bins at [REDACTED]	No	Peter & Claire Gear
45461	Yes	We would love the kerbside collection service. The medium size bins would be plenty. We do have the large recycling bin and it is too large. We do really only need to have the recycling and rubbish bin.	No	Joyce Agnes Burrows
45460	Yes	If its good enough to pick up the yellow bin it should be good enough to pick up general rubbish. Looking forward to the service going ahead.	No	Stephen & Sharon Harding
45459	No	<p>We pay [REDACTED]</p> <p>There are not services available at this stage at the address. We do not have POWER or WATER. We use a certified composting toilet system which is off the grid and does not require water. We use/visit the site once a week to stay one/two nights - but only in the summer. We use our self contained campervan for these visits. Sometimes a friend may come and use the Red Shed for accommodation but no more than two nights a month.</p> <p>All items including any rubbish is taken back to Christchurch. Council would be penalising us if the cost of bins etc were added to our rates. If the Council allowed us to stay full time it would be a different situation!</p>	No	Robin Wayne & Barbara Mary Meier
45458	No	Happy with how it is currently. Don't want to pay the money for kerbside collection.	No	Robert Hill
45457	Yes	The offer of lid clips is brilliant! Didn't know they existed.	No	Margaret Leslie Bothwell
45456	Yes		No	Baakman
45455	Yes		No	Jeff Scott
45454	Yes		No	Julie Lynn
45453	No	<p>1. We do not want any bins of any colour</p> <p>2. We do not use the Birdlings Flat Transfer Station as most people from Christchurch use it on Saturday morning to dump rubbish before they go through to Akaroa.</p>	No	Pam and Val Chambers
45451	Yes		No	Jennifer Stewart
45450	Yes	Please can we have kerbside collection in Birdlings Flat. Lid clips are a good idea and people could not leave bins out all day/night to reduce issues with bins blowing over.	No	Laruen Phillips
45449	No	Due to the very frequent strong winds and very narrow roads we have I don't believe the bins would be a good idea.	No	Diane Allison
45447	No	Birdlings Flat is a unique settlement with very tight roads and high winds. We all have to make an effort to live here so going to the tip Saturday mornings is no problem to us. We have just had the street lights turned off. We don't want to be like town, so don't push town on us.	No	Andrew Hughes
45445	No	<p>If I am going to pay - (no choice!) for the service then I will sign up for it. Im not going to pay for something and not use it! I think the existing Birdlings Flat Transfer Station is fine as it is (except for the hugely inflated green-waste fees) and I would have preferred NO BINS in Birdlings Flat and the good old dump to carry on. Purely due to my anger about being charged for something I don't use (like rates when I cant go to the public library or pool or museum or art gallery) I will be pushed into accepting bins at my address.</p> <p>I guess this is progress; hundreds of ugly plastic bins cluttering peoples properties and roadsides. Hmm.</p>	No	Jo Carneron
45437	Yes	Great to think that for only an extra \$49 per year I will not have to bundle up and transport our household rubbish to collection points.	No	Matthew Brosnahan
45430	Yes	<p>only interested in the small bins</p> <p>can the collection trucks cope with the township not having footpaths to put the bins on?</p>	No	Helen Whelan

Submission ID	Do you support the proposal to extend the three-bin kerbside collection to all serviceable roads in Wairewa?	Do you have any comments about the proposal?	Yes, I would like to speak to the Hearings Panel about my submission	Name
		clipped bins essential for windy Birdlings Flat I do not use the existing transfer station		
45402	Yes		No	Carolene Green
45394	Yes	Concerned about EMPTY bins being blown around when residents aren't home to bring them in straight after a collection.	No	Sue Manson
45331	Yes	I support expanding the wheelie bin collection on the condition that the additional cost is incurred by those residents it benefits only – i.e. if it costs us more than \$193.12 inc. GST per unit to run this service in the new locations, we should not do this.	No	Cameron Bradley
45322	Yes	We would only want 2 bins ,no green waste bin. The proposed route does not come as far as our gate.	No	Denis de Pass
45247	Yes	We own and rent 12 houses between Kaituna Valley, Prices Valley and Birdlings Rd and fully support the introduction of Kerbside collection - it will improved the quality of living in these areas and go a long way to supporting a better environmental outcome particularly around recycling. We have been asking for this service since 2012 so we are pleased the Council have made this proposal. We see no disadvantages for implementing kerbside collection - just positives.	No	Brenyt Thomas
45244	Yes	Most rural dwellers will compost vegetable matter, so the green bin seems superfluous and expensive.	No	John (and Averil) Mills
45236	Yes	Collecting and transporting greenwaste seems inefficient, and most people in rural areas have pigs, chickens or a compost bin. How about offering a compost bin to each property instead of a green wheely bin for a one off cost of about \$70.	No	Glenn Cogle
45221	Yes		No	Niki Davidson
45220	Yes	hurry up and get them here	No	Graeme James
45219	Yes		No	Nicholas Latham
45191	No	We are rural on 50 acres and compost our green waste, so we do not need a green bin. Rubbish bin would be welcome though	No	Katrina Ellwood
45177	Yes		No	Stephen Harding
45171	No		No	Donna Cowan
45170	No	We prefer taking all our rubbish to the local rubbish collection area at Birdlings flat	No	Viv Valentine
45167	Yes	We pay high rates for not having lights, unlimited water etc like chch resident's. Having rubbish collection is the least the council can do. It saves the elderly from having to go to the dump on Saturdays and save's those who don't or can't drive having there rubbish collected. It's been done for years in chch, why not here.	No	Anneke van Soest

Submission ID	Do you support the proposal to extend the three-bin kerbside collection to all serviceable roads in Wairewa?	Do you have any comments about the proposal?	Yes, I would like to speak to the Hearings Panel about my submission	Name
45157	Yes	1. Would the cost of collection be added to rates for each property? 2. What days would collection be done for Red / Yellow bins	No	Perry Davis
45151	Yes	Living in [REDACTED] Little River we currently get the yellow bin service. It is frustrating to see that the full service currently only goes as far as Cooptown which is just down the end of our road. It's not as if the road is on the hill it is flat and a gentle slope. The full service or inclusion of the red rubbish bin would be appreciated	No	Christine Piper
45141	Yes	The clips on the bins an excellent idea Currently we pay for all organic waste or it is going as general waste so an improvement. Will the transfer station still be open for other waste?	No	JOY DIXON
45128	Yes	Extending the service to include a red bin is a great improvement. However we don't see that the green bin is necessary given that almost all properties on the route will be rural and will have their own organic material disposal by means of composting, chickens, pigs, bonfires etc. A cheaper service without the green bin is a better solution. Additionally, some rural households are quite large and the option of a larger red bin, to match the size of the recycling bin, would be helpful.	No	Hamish Limbrick
45125	Yes	Finally happening! We are very pleased	No	Andrea and Rowan Drake
45122	Yes	Could you please consider going another 500m up the Okuti Valley Rd and Reynolds Valley intersection and turning around in the car park just past the Campground, as this is both a safer turn around for the recycling truck and would capture another 7 households	No	Stuart Wright-Stow
45121	No	Bins are of no use as we have a bach at Birdlings Flat and wouldn't be at property to put bins at roadside and then retrieve them after collection. The Birdlings Flat Transfer Station is of more use as it is open every week. Generally, our rubbish is taken back to Christchurch for disposal.	No	Theo Barclay
45117	No	It is very unfair to charge all ratepayers in the area the same amount for this kerbside rubbish collection. PROPERTIES THAT HAVE NO DWELLING ON THEM SHOULD NOT BE CHARGED FOR ANY KIND OF RUBBISH COLLECTION BECAUSE THEY WILL NOT BE USING THE SERVICE! And everyone else should have a choice regarding if they want the service and therefore are prepared to pay for it in their rates, or not. We are a user pays society, not a communist society. EVERYTHING should be user pays. That is supposed to be government policy, applied to EVERYTHING including local council services.	No	Heather Woods
45113	Yes	We would LOVE to have the bins at our house in Birdlings Flat!!!!!! And having the lid clips would be great, as we get LOTS of wind out there!!!	No	Serena Bolton-Marlow
45110	Yes		No	Rikard Decartia

Re: Lot 2 DP 44339, [REDACTED]

Submission #45668

Ms Zant,
Christchurch City Council,
Freepost 178,
Christchurch.

I refer to your letter recieved March 2022.

I do not support your proposal in any form.

This property is not inhabited, it has not been for more than 15 years, I have not been there for nearly 5 years.

The property cannot be inhabited, it does not, can not, and never has, made use of any of your rubbish stuff. Any items left there can not and will not be received.

I have told your outfit about this many times since 2008. You are incorrectly charging me already, charging me more for something irrelevant to this property would be further insulting.

L. Pickering, 4th April 2022.



Submission #45947

Kerbside collection service at Birdlings Flat

Date: 12/04/2022

Stephan Belchef, [REDACTED] I am the administrator of the late George Belchef and my own property [REDACTED]

I have seen many changers here at Birdlings Flat over the last 65years (I am 70 years old now). In the past I have been against having roadside wheelie bin service because I enjoyed catching up with people at the old dump, but the way we used to do things and how we lived our lives is regarded as redundant all on the scrap heap of life. I wonder why people come to Birdlings Flat and into the country/rural areas and then expect all the mod cons of city life?

Old Birdlings Flat and its fisherman's huts are long gone except for a few, just like duck shooting season is now, the old jalopies we built to travel up and down the beach on, are now frowned upon.

I have read the pamphlet the C.C.C. gave us, I have had to read it a number of times but really the information I was in need of is not there. I found the costings to my dyslexic eyes made no sense and neither did the bin size's. It would appear that the C.C.C. has made up its own mind about the matter. It would have been great, if we had a page giving us the size of bins and the relationship to how much this would add onto our rates per year.

I see myself as a blind man searching for answers and reluctantly, I have to go with this proposal like it or not.

1. What I need from the C.C.C. is when this will happen, a date.
2. The day when the bins are to be emptied. Where do we place the bin, for me I don't want to be moving the bins out of our main entrance and up the hill to sit on Hillview Road or do we use Coates Road? Or the side entrance?
3. Are you going to set a weight limit on each bin?
4. Are all properties paying rates going to receive the bins? Whether they have a building/home or a fisherman's hut and have the water connected? I would imagine a bare section with no water connected will not be getting any bins?

Next page

Conclusion;

Hopefully we are coming out of Covid. We ratepayers are facing troubling and worrying times. So much is being forced on to each of us.

1. Three waters, it appears that the C.C.C. has given up.
2. Our septic tanks here at Birdlings might be shut down by Ecan, that begs the question what the C.C.C. are going to do, when will they start on the sewage works and pipe all the waste away.
3. We must have a dark sky; I don't know where or how this one got plenty of traction.
4. Our local roads have had speed limits dropped.
5. Our highway speed limit is to drop to 80kms per hour and no improvements.
6. Will the government drop a few clangers before election 2023, OH YES, THEY WILL!

Cheeryho

Stephan Belchef

Submission ID	What do you think about the proposal to introduce a City Vacant differential of 4 for central city land with no active or consented use?	What do you think about the proposal to introduce a new rates remission for land kept in an improved and maintained state?	Where else do you think this could be applied and why?	Do you think that the Council should investigate options for increasing rates on derelict central city buildings, to ensure they contribute fairly to overall rates and to encourage them to commence repair work?	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
45847	See attached submission.	See attached submission	See attached submission	See attached submission	Yes	Nicki Carter	Nectar Limited	General Counsel
45950	Please find attached submission	Please find attached submission	Please find attached submission	Please find attached submission	Yes	Jamie Robinson	91 Victoria Street Limited	on behalf - Duncan Cotterill
45951	Please see attached submission	Please see attached submission	Please see attached submission	Please see attached submission	Yes	Leeann Watson	Canterbury Employers' Chamber of Commerce	Chief Executive
45959	See attachment	See attachment	See attachment	See attachment	Yes	Peter Scholes		
45534	<p>The proposal may result in tidying of sites but does not provide any incentive for development. The Council should consider the macroeconomic effects of the method of rating on the economy as a whole and change the entire city from CIV rating to Site Value rating with annual valuations. This has been done successfully for many years in Australian jurisdictions eg Queensland. The simplicity of SV rating makes annual valuation practical.</p> <p>CIV rating is rewarding those who hold their land vacant indefinitely because they believe the speculative value will rise. These owners block growth and contribute minimally to revenue. The owner who improves his property and the neighbourhood's appearance and land values is penalised with higher rates. SV rating is an incentive to either use the land or sell it to someone who will.</p>				Yes	Sally Kortekaas		

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	<p>Advocates of CIV say it is in accord with “ability to pay” but the presence and value of a building is no accurate measure of ability to pay. For example a family with a big house because they need one to live in, under CIV will pay much higher rates than the owner of a similar block next door who is holding the land vacant for investment purposes. The personal finances of those who are able to hold land for investment are likely to be much better with more ability to pay than young families with high mortgages. Older houses will also have smaller or fully paid off mortgages than newer more valuable houses with mortgages established on recent higher prices.</p> <p>I will link an article “Local Government Rates Primer” from Prosper Australia that cites research on this- “Murray & Hermans (2021) found that on all metrics of income, and socio-economic indexes (which include wealth and economic resources), SV was more concentrated among those with a greater capacity to pay. The wealthy spend a higher portion of their income and wealth on higher value land, than they do on bigger, better homes.” https://www.prosper.org.au/prime-rs/local-government-rates-primer/</p> <p>An emotive argument against SV rating is about the elderly home owner who has lived for decades in a low value home and does not</p>							

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	<p>want to move while the land value has risen greatly. Council could relieve any hardship by accruing the rates to the property until it is sold which may be after it is inherited. Considering the tendency of retirees to make a sea or tree change or move into a retirement village there must be a limited number of elderly wanting such assistance. I will include a link to an article about this issue in UK. Research at Birmingham University showed it indeed applies to a very small number of people there. http://kaalvtn.blogspot.com/2013/01/a-poor-widow-bogey.html</p> <p>The corollary of the argument about the elderly inner city homeowner is the young family with parents commuting long distances in congested traffic between home and work. Don't they deserve consideration too?</p> <p>The lack of incentive for CIV rating to develop vacant land causes urban sprawl with leap frog development of new suburban areas further from the city centre past large tracts of land whose owners prefer to keep vacant. This must increase the cost to Council of providing infrastructure and increase transport costs. I lived for many years in SE Queensland and the patchy distribution of vacant land throughout many Christchurch suburbs is noticeable compared to Queensland cities.</p>							

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	<p>The disaster of New Zealand's unaffordable house prices over the last 20 years or more has transformed society. Education and hard work no longer determine how wealthy you are, now it is where you live and your family's property asset base. Rising house prices redistribute wealth with resulting greater inequality. Around 2000 income to price was about 5 and before Covid it was an unaffordable 7 to 8. Since the government's economic response to Covid (low interest rates, high LVR and quantitative easing of 55Billion) it is now 11 to 12 after a 42% increase in house prices since the beginning of Covid. New Zealand house prices are among the most expensive in the world. The figures are from Bernard Hickey's podcast and email newsletter, The Kaka. This has occurred with low wages growth and freezes on the pay of all public servants like teachers and nurses. New Zealand is no longer an egalitarian meritocracy and the diaspora of the young is likely to increase. Many people will grow old still in private rental accommodation. On a low fixed income they live in poverty and are in a much worse plight than the elderly home owner living on valuable central city land.</p> <p>This is the context in which the Council in its CIV rating is</p>							

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	<p>apparently happy to promote the vacant land industry for the benefit of the owners of high value inner city property. For transparency Christchurch City Councillors should have their property assets on a public register.</p> <p>Please read the attached submission "The Merits of Site Value" by Phillip Anderson to the General Council for Rating Reform in Victoria, Australia in 1993. It documents the measured beneficial economic effects of SV rating in studies of the change in business and domestic activity after a change in rating system as shown by the number and value of building permits issued each year and by other measures.</p>							
45411	It is a good, well-targeted proposal. It will incentivise development in the city and make the CBD a more vibrant area.	It should only be a partial remission, not a full remission. If it is a full remission it takes away the main benefit of the proposal. Possibilities for another form of remission for these improved + maintained sites could include a differential of 2.5x or 3x, instead of 4x.	In residential areas, but with a differential of around 2x normal rates for these residential areas (while still keeping the 4x differential for vacant CBD land). Applying a version of this in residential areas will help to incentivise development of housing, which is urgently needed to help the residents of Christchurch in the ongoing housing crisis.	Yes. Too many derelict buildings still after 11 years.	Yes	Robbie Peacocke		
45178	I absolutely support this; if anything I don't think it goes far enough and it should be a 10x penalty because of the urban blight. It's been 11 years and it is	I would be open to a temporary reduction for max 12-18 months but at that point construction needs to have started or rates revert to an absurdly high amount	I believe this should be applied to unmaintained houses and rental properties throughout the city as well as un-repaired, "as is, where is" houses. The number of houses	Absolutely; it's a public health hazard and when the next earthquake hits, they will cause even more problems and possible fatalities.	Yes	Ngaio Parker		

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	detrimentally impeding the recovery of the downtown area and creating a disincentive for people to work/spend money downtown. One of the reasons why we ended up moving to Christchurch was everything that was happening downtown to create a compelling, interesting city - the phenomenal library, the museum, Riverside Market, vibrant restaurant scene, etc. I would love to convince more friends and family to relocate here but it's a hard value proposition when large parts of the downtown look like the set of a dystopian post-war apocalyptic movie set.	line 10x - I am tired of people land-banking at the expense of the majority.	with unsafe living conditions throughout the city is disproportionately high compared to other major cities I have lived in or traveled to.	4x is not enough; honestly do 10-20x. They got insurance payouts and most of them are looking for ridiculous offers that have no basis in economic reality so make it hurt. A lot. It'll be amazing how fast redevelopment plans are submitted to planning commission.				
45206	Hi Yes I agree someone needs to hold land owners to account to keep the area maintained and tidy. If it is an empty section growing weeds etc.	I don't know if introducing new rates is the answer. Maybe these owners need support not to be fined more.		I don't think we should be increasing rates. I think the council should just buy the land and use it for council use such as free car park buildings with a time limit in the city centre to bring more business and people into the city. Everyone would much rather go to the malls because they don't want to pay for the parking in the city. We don't know the situation of the building owners and what has happened with the insucompanies. I think they have already been penalized enough. The council could buy the buildings empty lots and also use them for shopping outlets and instead charge rent to the shop owners and make revenue that way. I don't think penalties to the original owners will solve the problem if the owners already don't have any money.	Yes	tamara aberkane		
45467	I believe it is short sighted and shows a lack of understanding of the dynamics surrounding these sites.	The fact that we have hundreds of acres of vacant land in the city would surely suggest there is a	Punishing land owners with punitive rates surcharges won't incentivise them to develop when a	The council should not act as an overbearing tyrant against those who have contributed their	Yes	ernest Duval	Equity Trust pacific	Developer, investor, property

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	These questions are leading questions which suggest their own answers so this type of 'feedback' loop is quite disingenuous, especially when you call it 'have your say'	larger problem to development than the council thinking that owners are not developing because they don't want to, that they are just land banking. There are no development drivers, non tenants, high construction costs, more people working remotely, devolution of the CBD to a conurbation of urban centres, borders closed, Covid resistance to coming into town, failure of the anchor projects to be completed and lack of people in the city. If council believes these to be untrue and that there is a strong development climate then it should be prepared to underwrite leases on developments to see the sites developed. If it's not prepared to assist then why is it trying to whip a horse to race when it got a broken leg?	<p>development environment doesn't exist. It's a cruel, stressful and vindictive approach to a complex problem which is not well understood by council and frankly it should be better understood.</p> <p>You must also realise that we demolished nearly 2000 buildings after the earthquakes, we have not needed to replace all of these and will not need to due to changes in work habits. The council needs to realise the CBD won't be what it was, it will be something different and needs time for that to evolve. The vacant sites are future vibrancy of the city and should be developed organically as and when need arises and not all at the same time. If we develop all our city at the same time it's going to look the same for decades to come. It's the smaller sites around the edges that will give the city the character it's lost, not the big monolithic sites. In our haste to rebuild a city in quick time we have made mistakes that can't be rectified so let's not force development but allow it to happen when it's needed.</p> <p>You have asked a series of leading questions which prompt their own answers, it's quite shameful. We are all in this city together and it won't be the council that develops these sites it will be the owners.</p>	monies to build the new city and finds ways to support them in a [positive manner. This jihad against owners of vacant properties will not result in new development because there are no tenants around to take up the vacant space. Have you noticed the failure of Entex? Have you noticed how many empty shops are around with for lease signs. Vacant shops in Cathedral Junction for over 2 years at the lowest rents in town so prey tell where would the tenants be coming from for the new developments you are trying to force owners to build for. Without tenants they can't get funding from banks which require a pre commitment from tenants				manager, media spokesman, builder, land developer

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45248	The Victoria Neighbourhood Association supports this proposal. There currently is little, if any, incentive for owners to do anything with their sites except 'land bank' them. We are particularly concerned about the large site on Manchester - Salisbury St, owned by Foodstuffs. We have contacted them several times to let them know how much support there is for a supermarket in that location, but their reply indicated they would not consider building there until Salisbury St reverts to 2-way. Given the number of supermarkets on 1-way streets, and the easy access to this particular site from all directions, we believe they are simply land-banking. Higher rates may encourage them to act sooner (or sell to someone who will develop the site). We feel the same about most of the other vacant sites within the central city.	We agree that using vacant sites for temporary activities and/or keeping them in good condition is better than nothing, but this still allows owners to hold onto land for many years. This proposal gives some incentive to improve the condition of vacant sites, so we do support the concept PROVIDED the proposed discretion is used wisely and not too often.	We would support the extension of this proposal to vacant sections within the Central City Residential zones as well. In our own small-ish neighbourhood there are 10 vacant sections, some which are very large. Given CCC's goal of increasing the number of people living in the Central City, there needs to be a disincentive to hold on to residential land without plans to sell or build within a specified period. Two provisos however: (i) that a disincentive to holding on to vacant houses is also put in place to encourage owners to repair (or demolish so someone else can rebuild) and (ii) that the CCC would not allow residential land to be used for non-residential purposes (even temporarily, which we know often becomes permanent).	Definitely! the sooner the better.	Yes	Louise Edwards	Victoria Neighbourhood Association, Inc	Chair
45506	Don't support	Support if penalty rate as above legally instigated.	Question the legality and moral authority to charge exorbitant rates for effectively no services.	Ccc have means legal avenues to deal with these buildings already and a penalty rate as a control mechanism is questionable mayoralty and legally.	Yes	Richard Peebles		
45257	I don't think you have thought this through properly ,you are better to work with owners and treat each case individually. we already pay for commercial 4 times what Australia pays in rates, so you are saying with this increase it would be then 8 times what Australia pay . This is robbery ! you are totally out of Touch .	It depend on where the owners are up to with their building plans and how much you expect them to invest in tidying up sites , this money could be wasted if they are working on plans,this money is better invested in plans than tidging up a site. A lot of owners with vacant land , have been held up with adjoining damaged buildings ,whom in same case are still awaiting resolving	I think you need to think hard about increase commercial rates any more than they are or you will find that the people of Christchurch will say enough and you will have Rates revolt . (as has happened before years ago in merivale) This has already been discussed by property owners of CHCH ,you need to find ways to decrease rates. The CCC need to cut its staff and costs . We have some commercial tenants in the	Again you have no idea of the commercial reality . This wont encourage them ,it will mean they will have less money to repair the buildings . Again if you are really interested in helping with these empty sites getingt developed and the buildings repair ,use some of your over 2000 staff to work with the owners and when they do build or renovate ,charge them fair resource consent fees and consent fees (not \$350 an hour).	Yes	Dean Marshall	KPI ROTHSCHILD GROUP , MARSHALL GROUP , ALSO CITY OWNERS REBUILDING ENTITY	DIRECTOR

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		insurance claim or finding the capital to repair. we have been developing other sites and cant do them all at once . This needs to be taken into account before penalising owners with increased rates.	CBD that can only afford to pay rates ,we don't get rent , due to the covid situation. The council want property owners penalised if they dont keep sites tidy . UNyet the CCC are guilty of that themselves ,Grass on road sites up the waist height , large trees that are leaning and need removing ,foot paths subsiding ,uneven foot paths ,drains that are blocked ,safety rails that are leaning and need fixing , mosquitoes issues due to blocked CCC drains,iron drain hatches needing repairs, road drains cracked , also with holes in them ,weed growing out of cracks and CCC ignore requests or do patch jobs, and this is in my street only in Cashmere . The bigger the Council has got and the more staff it has hasn't helped and our basic services have got worse over the last 30 years.	You can use a carrot or a stick ,a stick is bullying and doesn't work . In saying all of that ,you do have some amazing staff in the CCC that an amazing job.				
45526	I think that's a great idea	Also a great idea	It could be applied to all flat parking lots, as these spaces also provide no amenity for pedestrians, and discourage mode share to public and active transport	Absolutely- we need to encourage developers to get moving and do something with their land instead of landbanking. If they can't afford the rates hike, the CCC can buy the land and do something with it!	Yes	Nathaniel Herz-Edinger		
45794	The Board supports the proposal to increase rates on vacant central city land, as an incentive for developers to do something productive with these valuable properties. The Board also encourages the Council to explore financial incentives to encourage development, where development	The Board's support for the vacant land differential is on the basis that property owners who keep their vacant land in an attractive, well maintained condition, will receive a remission. The Board believes that the provision for a remission is essential to provide balance and fairness to the policy.		The Board supports the intention behind this suggestion for derelict buildings, but suggests it would need to be explored on a case by case basis to avoid unintended consequences. For example, placing financial stress on an owner with a genuine intention to commence repair work could risk undermining the intention of the policy.	Yes	Bridget Williams	Waimāero Fendalton-Waimairi-Harewood Community Board	Chairperson

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	occurs in a timely manner. It is also relevant that development is difficult at the moment due to a shortage of building materials and workers.	The Board submits that the rates remission is a great tool to encourage people to invest in our city centre. The Board endorse the rationale for encouraging vacant land to be used. We agree with the statements in the consultation material that vacant land can be an eyesore and appear unsafe at night time.		The Board also submits that any costs incurred by the Council to make a derelict building safe should be fully recoverable with interest by placing a covenant on the land title.				

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45829	Please see submission attached.	Please see submission attached.	Please see submission attached.	Please see submission attached.	No	Rosa Verkasalo	Canterbury District Health Board	Policy Analyst
45576	Excellent idea - the effect of uncared for empty land has implications for the city and how safe and inviting it is. A stick.	Great idea to encourage this. There are great groups like gap filler who are imaginative about possible short term uses.		Yes	No	Rosemary Neave		
45326	I support higher rates for un-maintained vacant lots in town				No	Ella Pairman		
45330	I support the principle of a vacant central city rating differential but believe the correct outcome (as well as other positive outcomes) would be better achieved by a switch from a land + capital value to a land value only rating system.				No	Cameron Bradley		
45118	This is an excellent idea to revitalise the city centre	I am generally against this proposal, and if it is implemented would encourage the council to keep the discretionary bar for this proposal high		Yes, please investigate these options	No	Will Miller		
45374	It is wrong. This is just punitive action from council for activities / lack of activities that you do not like. This is a slippery slop.	This is too subjective. If you like it, they can pay less. And it is compared to a guide only. These are bad rules, subject to judicial overview I suspect you will find it difficult to enforce.	To council land that is poorly maintained eg the red zone? Berms? Now do you see how stupid this proposal is? It also looks like you are trolling to find people you can charge more.	"to ensure they contribute fairly to overall rates"?? Are you saying the current level of rates they are required to pay is wrong? ie your rating system is wrong? No I do not. Once again this is all subjective, and arbitrary.	No	andrew mckay		
45380	I think this is a wonderful idea, to encourage inner city development	Also a great idea	A system of rates that encourages dense inner city living	Yes	No	Alexander Jobbitt		
45383	It's good but really post 2020 we should be working towards total tax reform like Land Value Tax.	The definition of maintained and improved is very subject to exploitation. Is maintained and improved actually good for the community? Does it make the council solvent? Does it provide dignified long term work? It could very easily be turned into a tax write-off by expert legalese, having the reverse effect than intended.	Gravel carparks and other non-businesses. They are economic blight. Christchurch is very walkable, and if there is a real pressure for parking then those businesses that require employee and customer parking should be subject to pitching in for parking buildings. This should be specific and calculated on their individual profits. 'Businesses' that do not	Again, we determine the value of a property based on the current tax, not its real land value. Because the overall property value is primarily evaluated on the low value of the building , increased rates is a push but I don't think it is enough to incentivize change. Especially without a consensus on the use of repaired buildings. For example, high-rises are not optimal for	No	Luke Cronquist	Sleep Center LTD	Cheif of Unemployment and Complaints

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			use infrastructure cannot plausibly pay for infrastructure.	most use cases. As offices become redundant with work from home, there is nothing to fill the void. As for the smaller buildings, they fall basically into the gravel carpark issue - even if restored and maintaining a profit to the owner, and paying even high rates, they still cannot return their real land-value back to the council. The solution to this is detailed in books like Strong Towns. You cannot simply repair the CBD, you have to make outer districts more viable and then give them an economic incentive to make their way to the CBD for something profitable.				
45132	good idea!	yes! It's good. The least they can do is maybe allow community groups to use that land for free since they are not using it anyway!	I think the government should be able to seize vacant land and abandoned houses, especially with the current housing crisis. Owners should not be allowed to land bank.	yes.	No	Hana SB		
45133	It's not wide enough. The bare or undeveloped sites are a lesser problem than the derelict sites. Nor is the financial incentive enough. The cost of maintaining the appearance of the site would be more than the rates increase thereby leaving the best option to still be to leave it as is.	It will still result in unproductive land staying unproductive. While it would make it prettier it doesn't solve or really encourage a longer term improvement.	Derelict buildings. They are the biggest eyesore. And landbanking in Christchurch in general. All uninhabited property should be captured.	Absolutely and with a matter of urgency.	No	Brian Perrett		
45134	Don't agree	Don't agree, because it's subjective.	Option to operate as a transitional carpark. It provides income for the owner to pay the Rates & have money available to spend on improvements	No, but the Council should have a condemned property process, that includes Heritage NZ & the Fire Service.	No	Gretchen Boyd		
45135	I think it should be higher.	Not supported. Land banking is land banking regardless of whether you mow the lawns or not	Most important in central city	Yes if the buildings are not inhabited and in use additional rates should be charged.	No	Abdallah Richards		
45136	I'm very for it. Make sure to include clauses to ensure that any	Make sure the standard of improvement is not too low.	I think this should occur across the city. Give new landowners a	Yes. The rates amount should be based on the estimated capital	No	Michael Schramm		

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	consents are being actively progressed as well, not just consent issued and then they sit there	Landowners should be turning them into full central city gardens, or pop-up malls or something, not just spray the weeds and dump a couple of planter boxes. Landowners in the central city are profiting big time from the city's revitalisation. Those who hold vacant lots are still profiting, but without doing any work or contributing like everyone else - free riding.	short while to sort something out after purchase, but past that, it must either be developed or become some nice little amenity in the mean time. This applies to both commercial and residential lots. Too many derelict business sizes all over the city, from the earthquake damaged East, out to parts of the West where old businesses have gone broke and the building just sits there looking worse and worse. Out West there are also plenty of new subdivisions where most lots are filled with newly build houses, but the ones that aren't are overgrown with weeds and are very unpleasant. The owners will be getting capital gains without paying much rates or helping to keep the street nice.	value of the site if it had been developed to a modern standard + an amount extra due to the negative amenity of their ugly site, affecting other landowners and the general public				
45137	That is a good idea but what about other developers in suburban areas as well as they just leave their land there for months and sometimes years without even doing anything to it and even leave old houses on that land to just rot. Not very fair on the neighbours either.	Maybe you could do this for everyone.	Private landlords who don't look after their properties as well should get a shakeup and land developers as well in the suburbs	Yes I think that is a good idea. You need to do this everywhere as well.	No	Linda Hawker		
45395	If we are talking Wilson's carparks, then yes please - they are disgusting to look at and of course all money collected from them goes offshore. They don't have to even think about the fact that they are making money off making Chch ugly. their 'carparks' are literally rubble and I can't believe they are allowed to charge locals to park there. They are not maintained etc. Yuck!	Yep - way too many people sitting on dead land, and even worse - dilapidated buildings that have been sitting as scars of the earthquake with nothing being done. I would particularly be interested in how and why the old lady who owns the properties on New Regent is allowed to destroy what is arguably one of NZs coolest streets! Make her sell them or do something with them - please!	As above.	Yes, as above!	No	Jane Schroeder		

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45142	Fully support it, long over due	Great to incentivise positive behaviours and address the negative externalities that poorly maintained sites have	Citywide. Think Antonio Hall.	100% some landowners are taking the monkey and don't give a rats about city perception or recovery. The city should be unwelcoming to those landowners unless they can demonstrate good reasons for their lack of activity	No	Bruce Radburnd		
45400	A very good idea. It is unfair on the city in general that these vacant sites have in affect being holding the city to ransom. They look untidy and are preventing further development. The owners should improve or sell them to someone that will. If they don't then then should pay higher rates for the land.	A rates remission if fair but not for making it a gravel area. This is of no benefit to any other member of the city, contributing to dust, heat reflection and a general eye sore. It does not encourage development around it or public use of it. It should be at an minimum be grassed so it has some small environmental, aesthetic and well being value. A larger remission could be given for helping climate change like planting it with trees while it is vacant. This would provide a temperature moderating effect for city areas, reduce pollution, be a positive space for the public to use, be aesthetically pleasing and absorb some carbon.		Yes for the same reasons listed above. A few owners cannot be allowed to inhibit the generation of the city. They have had ample opportunity to develop and plan and should now be forced to develop, improve or sell the buildings.	No	Matthew Reeves		
45154	Excellent	Excellent		Yes Please	No	Peter Morrison	Hospitality NZ	President
45166	Great idea, this will encourage owners to take long overdue action to sort the mess out.	I don't think this is a great idea, it sounds ok in principle but will be expensive to administer.		Yes, this would be much fairer.	No	Julian Donald		
45940	Good idea	Good idea, this will encourage land owners to keep them tidy.	Just start in the CBD and see how that goes, then you could expand out to inner suburbs such as Linwood, Sydenham etc.	Yes absolutely, a higher differential should also be applied to derelict buildings in the CBD. This is even worse than a vacant site and the owners have had more than enough time to demolish or develop derelict buildings. There needs to be an incentive to get them to take action.	No	Jane Hopkins		

Submission ID	What do you think about the proposal to introduce a City Vacant differential of 4 for central city land with no active or consented use?	What do you think about the proposal to introduce a new rates remission for land kept in an improved and maintained state?	Where else do you think this could be applied and why?	Do you think that the Council should investigate options for increasing rates on derelict central city buildings, to ensure they contribute fairly to overall rates and to encourage them to commence repair work?	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
45173	A great first step - and if it doesn't produce a behaviour change, then increase the differential in subsequent years. (only concern - would property owners just offset the increase as an expense against income tax?)	I would support a PARTIAL remission - the council needs to do more to combat land-banking leading to inflated property prices, which restricts growth and development both within the CBD and wider city	Throughout the CCC rating area - lots of examples of land-bankers that prevent growth + development around the city, while sitting on large capital gains	Yes	No	Matt Parkes		
45941	I support introducing a City Vacant differential of 4 for central city land with no active or consented use.	I think some rates remission would be appropriate where land is being improved/maintained according to standards set and monitored by Council.		Yes	No	Lindsey Conrow		
45175	Could not come sooner.	Absolutely opposed- it has been over a decade, the land should be improved and maintained already, the people who own these plots should not be incentivised, if anything they should be penalised.		Yes	No	Kay June		
45176	It should be more - these owners should be charged up to 10 times. It should keep increasing if these owners refuse to develop the land or sell it on.	No - make them develop or sell the land.	All through the CBD - including the decaying residential houses in the east near Barbados Street	YES - they don't deserve to own the land if they aren't going to do anything with it - It's been over 11 years - the city deserves to grow. They should be encouraged to build residential apartments - aren't we in a housing crisis?	No	Kendra Walls		
45179	I think this is a very good idea	Yes worth doing however things like parking lots etc should not be considered as maintained state!	using space as a simple carpark (not a multi story etc) should be considered as un-used space and show have a high charge connected with it, this land should be developed or converted into natural land for the public to enjoy not used or encourage people to drive more!	Yes, i think they should go even further, issue notice of derelict property that it needs to be restored/removed and converted to park land or other use within a year or it will be re-claimed by the city. Should not just be rates but a hard deadline that means if you do not comply the land will be lost.	No	Matthaus Woolard		
45190	Support	Support	Derelict houses in suburbs	Yes	No	Michele Dyer		
45960	The Board is in support of a new general rate differential for vacant central city land. We would like to see this approach extended to other areas where landbanking is				No	Bebe Frayle	Waitai Coastal-Burwood Community Board	Submissions Committee Chairperson

Submission ID	What do you think about the proposal to introduce a City Vacant differential of 4 for central city land with no active or consented use?	What do you think about the proposal to introduce a new rates remission for land kept in an improved and maintained state?	Where else do you think this could be applied and why?	Do you think that the Council should investigate options for increasing rates on derelict central city buildings, to ensure they contribute fairly to overall rates and to encourage them to commence repair work?	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
	occurring, for example in New Brighton.							
45962	<p>The Board notes the new general rate differential proposed for vacant central city</p> <p>land and accepts that this could encourage owners to develop vacant areas as well as</p> <p>help to offset the increase of residential rates.</p> <p>The Board acknowledges the difficult task the Council has to balance the costs of</p> <p>maintenance and development of the city, particularly in these difficult and uncertain</p> <p>times including current rising construction costs while keeping rates at a level that is</p> <p>affordable to residents. It urges the Council to recognise, however, that many</p> <p>residents are currently suffering significant financial hardship and to provide support</p> <p>where possible for those struggling to pay increased rates. In addition to the rates</p> <p>remission policy consideration could be given to payment schemes, deferral etc. with</p> <p>residents made aware that staff are available to discuss and support access to the</p>	<p>The Board acknowledges the difficult task the Council has to balance the costs of</p> <p>maintenance and development of the city, particularly in these difficult and uncertain</p> <p>times including current rising construction costs while keeping rates at a level that is</p> <p>affordable to residents. It urges the Council to recognise, however, that many</p> <p>residents are currently suffering significant financial hardship and to provide support</p> <p>where possible for those struggling to pay increased rates. In addition to the rates</p> <p>remission policy consideration could be given to payment schemes, deferral etc. with</p> <p>residents made aware that staff are available to discuss and support access to the</p>			No	Debbie Mora	Waipuna Halswell Hornby Riccarton Community Board	Chairperson - Submission Committee

Submission ID	What do you think about the proposal to introduce a City Vacant differential of 4 for central city land with no active or consented use?	What do you think about the proposal to introduce a new rates remission for land kept in an improved and maintained state?	Where else do you think this could be applied and why?	Do you think that the Council should investigate options for increasing rates on derelict central city buildings, to ensure they contribute fairly to overall rates and to encourage them to commence repair work?	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
	options for payment of rates.							
45963	Do not introduce rate remissions on vacant land and buildings. That would encourage developers to land bank. Maybe increase the rates. especially if the developer has removed tree cover.... I also think there should be really high rates on places like McDonalds, Burger King and liquor out-lets to compensate the Council for the money spent on removing broken glass and take away container rubbish littering public spaces.				No	Dorothy Lovell-Smith		
45197	Fully support this	I think this is a long overdue great idea! "Absent landowners", "Elsewhere owners" and landbankers need incentive to activate or at least maintain their properties, otherwise the look and feel of the city is negatively impacted and this isn't good from a visitor attraction or community pride perspective.	I think there should also be incentives for 'unused' land/property to be 'free leased' to community organisations or initiatives (for example Gap Filler, Life in Vacant Spaces, public art installations) to enhance the vibrancy of the city	Absolutely!!	No	Jill Borland		
45980	Koa has consistently requested a differential rate on vacant land and buildings. And approves a strong rate on empty homes, building and vacant land.				No	Stephen Howard	KOA Canterbury	
45981	Agree that long term vacant land owners should contribute to city financing costs. Some areas have land empty for decades.				No	Barbara Stewart		
45214	yes i support the proposal	No i do not support this		Yes	No	Kristina Wickham		
45982	HPC requests that for the proposed Vacate Land Rate Differential a provision allowing for discretion for Heritage and Character buildings be added.				No	Mark Gerrard	Historic Places Canterbury	

Submission ID	What do you think about the proposal to introduce a City Vacant differential of 4 for central city land with no active or consented use?	What do you think about the proposal to introduce a new rates remission for land kept in an improved and maintained state?	Where else do you think this could be applied and why?	Do you think that the Council should investigate options for increasing rates on derelict central city buildings, to ensure they contribute fairly to overall rates and to encourage them to commence repair work?	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
	<p>HPC is concerned the proposed new Rate in its application should not become a contributing factor in a buildings demise.</p> <p>HPC considers that an increased funding of the Tangible Fund (HIG grants etc) empowers the CCC Heritage Team to be more proactive and achieve more positive outcomes.</p>							
45984	I support the proposed targeted rating for vacant land in the central city as an incentive for landowners to keep their properties tidy. Some are very run down and neglected. Perhaps these landowners could be encouraged to work with Life in Vacant Spaces and other short term initiatives to bring life and vitality into the central city while the rebuild is still underway.				No	Marie Gray		
45985	Rating vacant land seems like a sound concept - especially if it opens up an opportunity to reduce rates of occupied, residential property.				No	Amanda Jane Nelson		
45988	<p>Does not adopt the Vacant Sites rating differential ("the differential");</p> <p>If adopting the differential:</p> <ul style="list-style-type: none"> ▪ Defer the programme for a further 12 months to enable property owners to plan, and budget for, either the differential or the required amenity improvements; ▪ Provide further clarity on both 				No	Sandimali Gunawardena	Property Council New Zealand	South Island Committee Chair

Submission ID	What do you think about the proposal to introduce a City Vacant differential of 4 for central city land with no active or consented use?	What do you think about the proposal to introduce a new rates remission for land kept in an improved and maintained state?	Where else do you think this could be applied and why?	Do you think that the Council should investigate options for increasing rates on derelict central city buildings, to ensure they contribute fairly to overall rates and to encourage them to commence repair work?	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
	<p>qualification and remission;</p> <ul style="list-style-type: none"> Adopt a grace period of 12-18 months from the acquisition of sites to allow new owners to plan development; Extend the exemption to capture the early design stage of the development cycle; Lead by example by ensuring that all vacant sites it owns or controls are kept well maintained in accordance with the proposed policy; and Promote the thinking behind the proposal in terms of the impacts of unmaintained sites in the CBD and by providing examples, options and costs of improving amenity. 							
45226	<p>Fantastic idea but it needs to been done across the whole city.</p> <p>New Brighton has a heap of land bankers</p> <p>And it should also include their carparks</p>	<p>Totally agree reward those who make and effort to keep tidy space of that community have use of the space to enhance the area.</p> <p>This also needs to be city wide</p>	<p>New Brighton.Lots of land bankers and also if it's good enough for the cbd it's good enough for the rest of the city</p>	<p>Yes and once again New Brighton and the rest of the city</p>	No	Nicola Griffin		
45227	<p>Good idea , we don't need big areas that are so untidy ,</p>	<p>I don't think we need to reward owners for keeping land tidy , or maybe we should get a rebate for keeping garden's tidy ..</p>	<p>Business in a bad state of repair, and hoarding properties</p>	<p>Absolutely they have had plenty of time to clean up ..</p>	No	Sue Brough		
45228	<p>Love it</p>	<p>Love it</p>	<p>New Brighton - it's severely lagging behind the rest of the city and those helping to improve the suburb are being thwarted by the horrific, vacant and overgrown/unused plots</p>	<p>Yes absolutely</p>	No	Kaylene Wakefield		

Submission ID	What do you think about the proposal to introduce a City Vacant differential of 4 for central city land with no active or consented use?	What do you think about the proposal to introduce a new rates remission for land kept in an improved and maintained state?	Where else do you think this could be applied and why?	Do you think that the Council should investigate options for increasing rates on derelict central city buildings, to ensure they contribute fairly to overall rates and to encourage them to commence repair work?	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
45229	Great idea.	Not so keen on this. I feel like this should be a given.	New Brighton is a sitting duck for this! It could have such a positive impact on the area.	Yes	No	Sylvia Smyth		
45246	Great idea.	No remission should be given for maintained land. Every landowner (whether commercial or residential) should keep their land well maintained. If improvements are made which have a direct benefit to the community then consideration could be made toward a rates remission, but not if the council is expected to maintain the kind for the community's benefit.	Vacant commercial land in New Brighton should be included in the Vacant differential proposal as there is a lot of spaces with no active or consented use.	Absolutely.	No	Dannys Nuttridge		
45249	I agree that action is required on these vacant properties and the proposal is OK. However, council "looked at whether we could set the general rate in the central city on land value while the general rate for the rest of the city would continue to be set on capital value. This would even out the contributions of ratepayers in the central city and ensure that they all pay a fair share". On exactly the same logic as put forward for the central city, why not adopt a land value rating system across the entire city? High capital value is a poor indicator of the council/infrastructure services used. Additionally, adopting a land value rating system would	I like this because it aids the goal of improving these sites quickly.	N/A	Yes, they are holding back the success of the rest of the central city	No	Connor McIver		

Submission ID	What do you think about the proposal to introduce a City Vacant differential of 4 for central city land with no active or consented use?	What do you think about the proposal to introduce a new rates remission for land kept in an improved and maintained state?	Where else do you think this could be applied and why?	Do you think that the Council should investigate options for increasing rates on derelict central city buildings, to ensure they contribute fairly to overall rates and to encourage them to commence repair work?	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
	encourage densification in the right places (i.e. better connected/inner suburbs with higher land value), better enabling council to met its environmental goals.							
45250	A good thing as long as Council is included in their land/buildings that are a tragic sight. Look after your own before you start criticizing anything else.	You are such a joke		I think Council should get off their backsides and do something with their own sites before picking on anyone else. This Council is such a disgrace. You sit behind desks and think you can do anything to anyone. Look in your own 'park' first	No	Jennifer Lawrence		
45507	I support this proposal for the reasons outlined. The vacant sites in the city are an eyesore and I hope this will encourage further development on those sites. It feels fair for the owners to help pay for city improvements, which they will benefit from when they develop or sell the land. I'm also unclear whether the many gravel car parks in the city centre will be covered by this policy. I hope they will! It would be great to transition land away from car parking to more productive and less emissions-supporting land uses.	I support this as a way to encourage land owners to improve their vacant sites		Yes	No	Arthur McGregor		
45252	I definitely approve and I think it should have been done long ago!	Reasonable but I'm unclear if there is a difference between where land remains vacant and where development plans have been submitted. I think that the latter should benefit more.		There are still some terrible looking derelict buildings, eg one opposite the Arts centre on Worcester Street (another nearby where tarpaulin still just hangs over windows). They are a disgrace to the city. I do believe that rates on derelict buildings should be increased until, if not restored, at least they are	No	Jean Flannery		

Submission ID	What do you think about the proposal to introduce a City Vacant differential of 4 for central city land with no active or consented use?	What do you think about the proposal to introduce a new rates remission for land kept in an improved and maintained state?	Where else do you think this could be applied and why?	Do you think that the Council should investigate options for increasing rates on derelict central city buildings, to ensure they contribute fairly to overall rates and to encourage them to commence repair work?	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
				demolished and the vacant land tidied and maintained.				
45254	It's a great idea. Why are you even consulting on this?!	There needs to be some standards and regular inspections, otherwise landowners will just chuck on a few planter boxes and leave the plants to die		Again, why even consult on this? If course you should!	No	Ian Chesterman		
45255	A multiplier of 4 is not enough. The rates should be set at a value that reflects the capital value of the site, were it fully developed, for one of several possible purposes, for example: cafes; shops; hotel; recreational garden; parking; offices. etc. Prime central city land is valuable resource for the people of Christchurch and it's insulting to CCC and other developers who have invested significantly to create an attractive, vibrant city. If land owners don't want to develop, then they should be required to allow other investors to develop. The investor would pay rent at "land-only" prices.	Long overdue	The principle could apply to residential property owners or occupiers to provide an incentive also to maintain high standards in our city. If it's possible to enforce the principle then that might lift suburbs that are generally of a lower standard.	Yes. "Encourage" is a soft word. I am not "encouraged" to maintain my pool to an acceptable standard; I am "forced" by the council to do so, or incur significant fines. Furthermore, neighbours can report me to the CCC if I don't maintain the grounds around my home. We should not be "soft" on the owners of derelict buildings and land.	No	Keith Jessop		
45260	Its great. Please implement it.	Seems resonable, we want the land to be used, but pretty is the next best thing.	Reduce the number of Wilsons carparks in chch.	Yes	No	Karlia Larsen		
45262	The owners of these disgraceful properties need to either rebuild or put their properties up for sale. The CBD in Christchurch is a complete disaster with these unsightly lots and buildings, e.g. Soul Square. No incentives should be given to these owners, it's either rebuild or sell!	An improved state? What does that mean - removal of a few weeds/bricks?? I keep my property clean and tidy - how come I don't get a rate decrease?		Increasing rates would do nothing. These owners just don't care!	No	Christine Smith		
45524	I give full support for this measure.	I do not support this idea.	N/A	I would give full support to increasing rates on derelict buildings anywhere. Viable accommodation (affordable bed-sit/studio) is urgently required	No	Lizzie Cook		

Submission ID	What do you think about the proposal to introduce a City Vacant differential of 4 for central city land with no active or consented use?	What do you think about the proposal to introduce a new rates remission for land kept in an improved and maintained state?	Where else do you think this could be applied and why?	Do you think that the Council should investigate options for increasing rates on derelict central city buildings, to ensure they contribute fairly to overall rates and to encourage them to commence repair work?	Yes, I would like to speak to the Hearings Panel about my submission	Name	Name of organisation	Your role
				city-wide and such planning should be pursued.				
45805	I fully support the proposal to introduce a City Vacant differential in the Central City Business Zone and the Central City Mixed Use (South Frame) Zone. Great initiative	I support the rate remission for land kept in an improved state	Sydenham and to the East of the CBD (towards Linwood) as these areas have a lot of the same issues (lots of carparks, land-banking that looks ugly etc.0	100% - there's been such progress over the past few years, we want to encourage land and building owners to continue to momentum	No	K Schriiffer		
45812	We support the proposal in principle.				No	Kate McCombs	Ilam Labour Elecorate Committee	Secretary
46035	Im concerned about my own properties in the CBD of which I have three along Manchester St. I dont think it is fair or even legal that you want to charge more rates if we do not landscape them. Why target us? My three sites are kept extremely tidy but you are forcing us to grass and landscape our own private land for your benefit. How can you decide that if you dont like the look of a property then you can charge that person more rates? Surely this is against my rights as the property owner? Would it not be better to approach us personally and come up with ideas that suit both of us, perhaps you offering assistance? I believe that we have already made a large investment by owning these properties and will be investing even more on them in the future to make some awesome buildings and adding great benefits to the city. This heavy handed approach does nothing but annoy us as owners, investors and developers of the city. The people you need to keep on side.				No	Jordan Glenn	Jordan Property Group	

Submission #45829

Canterbury

District Health Board

Te Poari Hauora ō Waitaha

Item 3

Attachment I

Submission on Proposal to increase rates on vacant central city land

To: Christchurch City Council

Submitter: Canterbury District Health Board

Attn: Rosa Verkasalo
Community and Public Health
C/- Canterbury District Health Board
PO Box 1475
Christchurch 8140

Proposal: CCC propose setting higher rates on some vacant land, initially in the central city's commercial area, that has no active or consented use. A rates remission will be available where land is kept in an improved and maintained state.

Submission #45829

SUBMISSION ON Proposal to increase rates on vacant central city land

Details of submitter

1. Canterbury District Health Board (CDHB).
2. The submitter is responsible for promoting the reduction of adverse environmental effects on the health of people and communities and to improve, promote and protect their health pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956. These statutory obligations are the responsibility of the Ministry of Health and, in the Canterbury District, are carried out under contract by Community and Public Health under Crown funding agreements on behalf of the Canterbury District Health Board.
3. The Ministry of Health requires the submitter to reduce potential health risks by such means as submissions to ensure the public health significance of potential adverse effects are adequately considered during policy development.

Details of submission

4. We welcome the opportunity to comment on the Proposal to increase rates on vacant central city land. The future health of our populations is not just reliant on hospitals, but on a responsive environment where all sectors work collaboratively.
5. While health care services are an important determinant of health, health is also influenced by a wide range of factors beyond the health sector. Health care services manage disease and trauma and are an important determinant of health outcomes. However, health creation and wellbeing (overall quality of life) is influenced by a wide range of factors beyond the health sector.
6. These influences can be described as the conditions in which people are born, grow, live, work and age, and are impacted by environmental, social and behavioural factors. They are often referred to as the 'social determinants of health'¹.

¹ Public Health Advisory Committee. 2004. *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee: Wellington.

Submission #45829

General comments

7. The CDHB supports the proposal as the rates increase, which can be remitted if land meets the conditions and criteria, incentivises vacant central city land to be kept in an improved and maintained state. This promotes the use, development and protection of physical and natural capital which enables people and communities to provide for their social, economic and cultural wellbeing, and for their health and safety. The Healthy City report developed by the Key Cities network consisting of cities and councils across the UK, highlights the importance of developing attractive cities to support growth, innovation, closer communities and economic outcomes in to the future².
8. Further, the CDHB notes that a good quality, vibrant space that is perceived as well maintained and cared for by its owners promotes greater respect for the environment and reduces the likelihood of crime or vandalism, as outlined in the National Guidelines for CPTED³. As a result, these spaces are likely to be and feel safer, resulting in attracting more people, activity and investment.
9. The CDHB acknowledges the value that Gap Filler and other similar and aligned projects over the earthquake recovery period have added to the city and local communities. These projects and initiatives have provided opportunities to be active, to participate in the local environment and have new experiences. The CDHB recommends that it is ensured that potential barriers such as rates are minimised for these types of initiatives to retain and promote future innovative and vibrant projects and spaces.

Conclusion

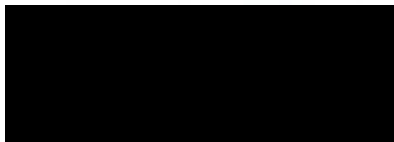
10. The CDHB does not wish to be heard in support of this submission.
11. If others make a similar submission, the submitter will not consider presenting a joint case with them at the hearing.
12. Thank you for the opportunity to submit on the Proposal to increase rates on vacant central city land.

² Key Cities. (2022). The Healthy City – A futuristic reimagining of the urban economy and built environment.

³ Ministry of Justice. (2005). National Guidelines for Crime Prevention through Environmental Design in New Zealand Part 1: Seven Qualities of Safer Places. Ministry of Justice: Wellington.

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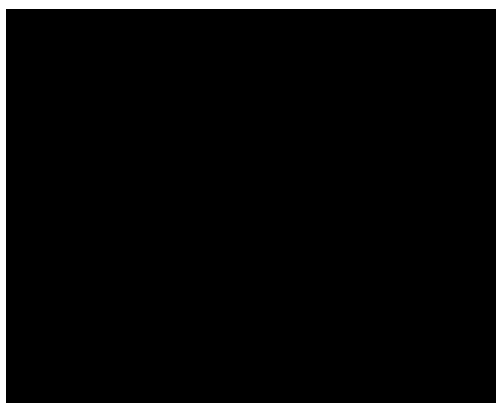
Person making the submission



Dr Anna Stevenson
Public Health Physician
Medical Officer of Health

Date: 14/04/2022

Contact details



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Submission #45534

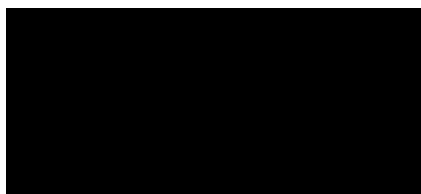
General Council For Rating Reform

30th September, 1993

To the Office of Local Government
7th Floor
500 Bourke Street
MELBOURNE Vic., 3000

Rating Review Submission

The General Council for Rating Reform hereby submits to your office, our document
The Merits of Site Value. This is our comment in answer to your discussion paper
"Rates - Proposals to Improve Victoria's Municipal Rating System".



Phillip Anderson
PRESIDENT

GPO Box 955G, Melbourne 3001

Item 3

Attachment I

Submission #45534

To the Office of Local Government

The Merits of Site Value

Rating Review Submission

Item 3

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Submission #45534

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Submission #45534

Introduction

This submission is set out to answer particular viewpoints raised by the Discussion Paper -
IIRates - Proposals to Improve Victoria's Municipal Rating System" from the Office of Local Government (referred to hereafter as IIRates").

We set out our submission in the same order of points as raised by the Office of Local Government.

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Submission #45534

1.3 Terms of Reference

Valuation Issues

Should site value and/or net annual value be retained as bases for municipal rates, in addition to the Capital Improved Value system?

Valuation should be on Site Value only, throughout Victoria for reasons detailed herein.

Should there be more frequent valuations than the current four-six year Cycle?

Valuations should be yearly.

DiFFerential Rates

Should there be limits on the application of differential rates?

If more than one system of valuation is retained, should councils be able to gain access to a full differential rating system?

Should there be special arrangements for farms and major capital projects?

Differential rates are not the cure for rapidly changing property values. As demonstrated however, differential rating is possible without having to link it with elv rating.

The obvious and fundamental long term solution is that valuation of properties and assessment of rates be brought closer together in time (i.e. annual valuations, to be applied during the year following valuation).

Flat Charges

Should minimum amounts be reinstated to replace the municipal charge? If so, should a ceiling be imposed on their use?

Minimum rates should continue to be phased out.

If the municipal charge is retained, should the current ceiling on the use of the municipal charge be changed?

If minimum rates are phased out entirely, a moderate municipal charge could be justified, of an amount certainly no higher than it is currently set, preferably at about half of the current amount.

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Transition

Are any transitional arrangements necessary to smooth the transfer from the existing system to the new system?

The application of Site Value Rating makes this unnecessary.

1.4 Revenue Raising and Pricing Policy

Your document "Rates" does not endeavour to take account of the macroeconomic effect rating has on the economy as a whole. It is detailed clearly in our summary section, the profound effect councils may have on economic development within their community. Such effects not only can be demonstrated statistically but are well known historically. Geoffrey Blainey, in his book "A History of Camberwell", explains it this way:

"A few hundred people (in Camberwell) owned large areas of cow paddock and market garden and vacant land and refused to sell them for housing partly because they believed the speculative value of the land would rise. Such people blocked Camberwell's growth and contributed little to its municipal revenue. At Camberwell junction and other shopping centres, owners of old wooden shops were paying smaller rates than the enterprising landlords who built expensive shops and attracted business to the centre. In residential streets, landlords who allowed houses to go unpainted and unrepaired paid smaller rates, while the landlord who improved his property and therefore the neighbourhood's appearance and land values was penalised for his enterprise with higher taxes. The reformers argued that a new method of municipal taxation would accelerate the pace of Camberwell's growth and improve the quality of the suburb. Calling for a referendum, they carried the poll after a fierce campaign and Camberwell and Caulfield became the first Victorian municipalities to tax the land and not the buildings. From 1922, the new method of taxation undoubtedly forced many large landowners to release vacant land for house building....."

This principle is still appropriate to Melbourne's outer suburbs today.

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1.5 Legislative Overview

Your document "Rates" states "the current rating situation has evolved over the past thirty-five years". The period is in fact, longer than this.

Originally the only basis for Municipal rates in Australia was the Net Annual Value system inherited from England. In the late nineteenth century Henry George, an American writer popularised the notion of rating on land values, rather than Net Annual Value, as a means of encouraging development and returning to the community a part of the unearned increment on the value of the land. Henry George believed that collection of this unearned increment in land could eliminate the need for all other forms of taxation.

In 1920 the Victorian Government amended the law, therefore enabling Municipalities to rate on the Unimproved Capital Value (U.C.v.) which was the forerunner of Site Value.

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2.1.1 Site Value

Concise Statement of Arguments in Favour of Site Value Rating

1. Site Value Rating is equitable

Under SV rating the owner is paying in proportion to the value of the site (land) occupied. No inquiry is made into how well or poorly the owner is using the land. This is fair; according to a sort of "user-pays" principle, as the value of the site is due to the services made available to the site by the Council and by other public and private bodies. The SV rate payer is just paying in proportion to the value of the services which have been made available to him/her (and is not paying in proportion to the value which the owner adds to the property, as would happen with the other systems).

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II. Site Value Rating is expected to have beneficial effects

As the rates on unused and under-used land are higher with SV rating than with the other systems, owners are discouraged from holding land out of use, and are encouraged to use it, or to sell or lease it to those who do wish to use it.

As the rates will not be increased when the owner spends money on improving the property, the owner is not discouraged from improving the property, as he/she would be under the other systems.

III. Site Value Rating is observed to have the beneficial effects expected

Studies have been made of the change in business and domestic activity which occurs after a change in rating system, as shown by the number and value of building permits issued each year and by other measures.

The confirmation is nearly universal.

Please refer to figures at Appendix I.

Conclusion: SV Rating has measured beneficial economic effects.

IV. Voters have shown a *great* preference for Site Value Rating in rating polls

There have been 114 changes or attempts to change the rating system in Victoria since 1920, when it became legislatively possible, up to October 1992, when the Local Government Act 1989 came into effect. The voters voted "Yes" to change to SV rating in 75% (48 in 64) of voterinitiated polls, and voted "No" in 91% (21 in 23) of the polls which voters called to oppose Council's resolutions to change back again.

See Appendix II "Municipal Rating Polls in Victoria", a 3-page listing of all the 114 changes and attempts to change the rating system in Victoria From 1920 to 1992, with a pink summary sheet at the front of the listing.

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The listing and summary are important, as those opposing SV also oppose rating polls, and have tried to have them abolished, on the grounds that "Australian voters always vote 'No'" and thus frustrate the plans of the Councillors. (They pick out, for their argument, the polls called to oppose Council's resolutions.) The facts clearly refute this argument, when all polls are considered.

However, the would-be abolitionists have succeeded to a large extent, as they have abolished the power of municipal voters to initiate rating polls as from 1st October 1992, and are attempting to abolish the other power which voters currently have with regard to rating polls - that of being able to have a poll opposing a change in the rating system when a Council passes a resolution for a change.

Conclusion: Rate payers overwhelmingly reject NAVICIV at polls.

V. The simplicity of Site Value Rating valuations

Valuations of vacant land sites do not require inspections of improvements on the sites, as there are no improvements.

Under SV rating, valuations of improvements on sites are required only when improved properties are sold, so that the value of the improvements may be subtracted from the sale price to find the value to the purchaser of the site without improvements.

Under the CIV and NAV systems, every property should be inspected and valued at least once in each valuation period, and when substantial changes are made in the value of improvements. If inspections are not made, the owners are getting rougher justice than the community should be satisfied with, when a better alternative is available. Complications, such as the expense in demolishing a building, and the residual value of a building, are routinely taken into account by valuers.

Under SV rating, no intrusive inspections are required, valuations can be made accurately in less time, and averaging can be applied more universally and accurately.

Conclusion: SV valuations are as simple to apply as CIV/NAV.

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VI. The increased frequency of valuations possible with Site Value Rating

With the simplicity and increased speed and general accuracy of valuing for the SV system, valuations *may* be made more frequently. Ideally, the valuations should be carried out annually.

A great deal of the present trouble is due to the four year currency of valuations (albeit with some adjustments), and the rapid and out-of-step changes in commercial and residential values. SV rating with annual valuations is the fundamental and long term cure.

This has been shown to be possible in Queensland.

VII. Discouragement of urban sprawl

With SV rating, vacant (and under-developed) sites are more heavily rated than in the other systems, and the rates will be higher for valuable inner sites, and the rates will not be increased if the sites are developed. Hence the owners are encouraged to improve and use their more valuable sites, or to sell them to others who will do so. This directly leads to a reduction in "urban sprawl".

VIII. Why place ourselves at a disadvantage with respect to other states?

New South Wales and Queensland use only SV rating for all of their municipalities (and for nearly all of their water and sewerage rates). Tasmania is the only State which does not use SV rating at all (although it is legal for the Councils to choose to do so).

If we allow owners in Victoria to hold sites undeveloped at little cost, and penalise them with higher rates if they do develop (which is the immediate effect of CIV and NAV rating), we are giving people who wish to develop productive enterprises one more incentive to do their development in another State.

Conclusion: A shift to CIV rating will further promote a migration of business northwards.

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IX. Site Value Rating as the source of revenue which grows naturally

There are two factors which result in the steady increase in the value of land beyond the increase due to inflation:

- (i) the increasing productivity of our technologically-advancing society and
- (ii) our increasing population, including potential buyers and users of the land.

Thus, without increasing the rates expressed as cents in the dollar, and without imposing increased rates on owners who improve their properties, council revenue will increase naturally and smoothly.

Conclusion: SVR is a natural- and just - source of increasing revenue.

X. The "Ability-to-Pay" fallacious "Argument" against Site Value Rating

Almost the only argument which the persons who advocate other systems of levying rates seem to be able to find is the "ability-to-pay" argument. They say that the more valuable the property, the more able to pay is the owner. And they customarily compare a Coles-Myer' store with a household; or something similar.

This is an emotionally-toned comparison, and, at first sight, may appear to have something in it.

But it hasn't.

The effect of the system of rating on Coles-Myer' should be considered as compared with other businesses, and, in order to find the effect of a tax, as if all of the Coles-Myer' stores were being subjected to the same tax. it would be found that the system of rating has a significant effect on its profitability.

A householder should be compared with another householder. And a householder, for instance, who has a more valuable property because of extensions to his/her house due to an increase in the family may have a definitely smaller ability to pay, instead of a greater ability.

Also, the owner of a mortgaged new house built at modern cost has less ability-to-pay than the owner of an old house now probably mortgage-free.

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In both types of case just described, which must be quite common, NAV or CIV rating would load those less able to bear them with the heavier rates.

Again, investors in vacant land and underdeveloped properties usually have high ability-to-pay but would be let off with very low rates under CIV or NAV rating

Conclusion: SV rates are properly seen as based on a charge in proportion to services rendered, the value of the services rendered (by the whole community) being measured by the value of the land.

XI. *The fallacious "Argument" that Site Value Rating is NO LONGER necessary*

It is sometimes admitted that SV rating had a use in the early stages of development of a region, when there were many vacant sites, but that now that almost all sites show at least some development, SV rating has done its job, and should be replaced by one more suitable to the times, etc.

It is usually also added that, by moving to NAV or CIV rating and thus rating on the improvements as well as the land, the rate in the dollar could be lowered while still obtaining an increased revenue in rates.

The argument is fallacious; the encouragement to develop and the non-penalty if one does develop are still as effective and as needed as ever, even though the effect may be less obvious when early all sites show some development.

Also, the action of switching to rating on improvements without a long warning period seems immoral. Having encouraged development by refraining from levying rates on improved properties, those who have improved their properties are now to be penalised, and in proportion to their improvements. Especially in these recessionary times, many small business people will be ruined. And this is mainly to give relief to people who have not developed their properties, but have had big increases in land values, "which are due, not to anything which they themselves have done, but to the development and the activities of the community around them".

XII. *Farmers*

Please refer to Appendix III "How SVR benefits the farmer". Some of these figures from the study are now dated somewhat. The principle holds true today though just the same.

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2.1.3 Capital Improved Value

A refutation

At 2.1.3, the Local Government review admits the fatal weakness of its claim that CIV meets the equity criteria considerably better than SV: "...that those with 'the greatest capacity to pay' are more likely to invest in their properties and make improvements...(is) impeded, especially in 'asset rich income poor' cases."

The argument for CIV is not only imperfect: it is wrong. If the claim is reversed, that SV meets the equity criterion better than CIV, there is no such flaw. The following serves to prove the point:

Every municipality has its *hills*, where the more well heeled wish to live: The Strand in Williamstown; Docker's Hill in Richmond; or Wheelers Hill in Waverley, etc. Without exception, these areas have higher site values than other locations within each municipality. Therefore, SV picks up these wealth differentials on the basis of what has to be paid to get into superior enclaves: and it is a community - created value. On the other hand, CIV penalises the rate payer for the improvements upon his or her property. CIV dismisses this most fundamentally equitable case in favour of SV rating.

Under CIV, those people who are both outside such choice areas and with more extensive improvements - usually because of bigger families and/or mortgages - must therefore tend to subsidise the others in the more - wealthy locations. This alone should put paid to the case of CIV

[It is interesting to note that in the USA, which has CIV 'property (and blighted cities of an order not experienced in Australia - because of a lack of SV incentive for urban renewal) there is evidence of cities beginning to swing towards the Australian system' of SV: see the writings of Professor Steven Cord and others, indicating some 20 cities to have made the change in recent years].

The 'simplicity' case for CIV (under the same reference in the rating review) comprises a number of misstatements. People certainly do misunderstand all the rating bases - SV, CIV, and NAV. However, when each system is adequately explained, an overwhelming number of polls have shown a preference for the equity and simplicity of SV rating. (see figures elsewhere in this document).

The argument that adjoining municipalities with different valuations systems are in themselves the cause of rating complaint is just as easily met as the recommendation for CIV throughout the state by requiring councils to employ SV rating across the board.

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When increasing the regularity of rating valuations is an aim in equity, it should be acknowledged that valuers can more quickly prepare SV valuations than CIV, unencumbered by the need to record details of the improvements upon rate payers' land.

The push for CIV rating comes from within local government, and not from the people. It is misconceived. Those who understand the equity of SV have little difficulty in realising that CIV rating promises to be eminently more disastrous for the Victorian community in both principle and practice.

2.2 Frequency of Valuations

It is clearly shown, in the state of Queensland that yearly valuations are possible today. Annual revaluation is an urgent item. We have noted already that yearly valuations are far easier under SVR. It is rightly pointed out that current four year cycles are often criticised, especially when property values fell between say the valuation date of mid 1990, and the first use of this base in October 1992.

It is interesting to note the silence of rate payers (particularly landowners) when rates were paid in 1989 and 1990, based on far lower valuations of 1986 property values.

3. Differential Rates & 4. Flat Charges

Current Problems with Minimum Rates and Differential Rates

Introduction

Big changes have been going on in Local Government affairs in Victoria during the last several years.

Two changes which are receiving attention currently are:

- (i) claimed difficulties with the phasing out of minimum rates,
- (ii) pressure to introduce the use of differential rates.

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1. Minimum rates, and 'their abuse

There has recently been some pressure within some councils to move away from SV rating, with the declared purpose of giving some relief to many rate payers where rate amounts have sharply increased when compared with previous years.

One cause of the sharp increase, with many councils, is in the requirement, imposed by the government, of phasing out minimum rates. These cases, however, are due to an abuse in the past by those councils in increasing their minimum rates to unreasonably high levels.

(There is another cause of the sharp increase, however, related to changes in property values, for which councils can not be blamed.)

With high minimum rates, poorer people have been subsidising wealthier people. It becomes like a poll tax, but a poll tax on properties instead of a poll tax on persons. With some councils, the minimum rate was so high that more than half of the properties were on the minimum rate.

When minimum rates are phased out, the general rate has to be increased if the council is to obtain the same revenue. That means higher rates have to be paid on the more valuable properties.

In SV rating municipalities, those people on valuable land but only modest or no improvements would have their rates reduced from those as now assessed if they could push rates on to improvements as well as land, that is, if they could have CIV or NAV rating introduced.

But this would create worse problems for people who have highly developed their properties and are most worthy of support. These would receive even sharper and unexpected increases in their rates. This would include many business people, some of whom could be expected to be ruined.

Probably the most numerous beneficiaries of a change to CIV or NAV rating would be those who bought houses long ago in areas where land values were once low and have risen greatly. They would have been sheltered from the appropriate increases in their rates in the past few years by the increases in rates for the poorer people who have been paying higher and higher minimum rates. For that part of their increase of rates which is due to the elimination of minimum rates they should now cheerfully pay the increase, reflecting that this is balanced by the times when they were paying less than would have been required by good rating practice with low minimum rates.

These owners of residential property on valuable land do at least have an option, which may not be a very desirable one, but does leave them solvent. This is that they should sell the property, and buy again in a cheaper neighbourhood. If, instead, they manage to get a change in rating system and thus transfer their burden to others, these others, particularly many business people, may be bankrupted.

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II. Differential Rates - The cure for rapidly changing property values?

There is usually a two to six year lag between the valuation of a property and the use of the valuation in calculating the rates to be paid on the property. While values of land are changing only slowly, this lag is of no great consequence. However, when values change rapidly, the lag may be of considerable consequence, particularly if values are falling. This is accentuated if the change is much greater in some parts of a municipality than in others.

Such is the case at the present time. Valuations were carried out near the peak of the market, and the present time of assessment and paying of the rates is occurring, presumably, at about the trough.

A remedy being asked for by some is that the Council should change its rating system from SV rating to CIV rating.

This change seems to be requested for two reasons:

- (i) the rate burden would be shifted partly to rates on improvements, thus diluting the problem for those with high land valuations and low or no improvements (but making it worse for those who have improvements which are higher than average for their land value - people with good modern homes and many business people),
- (ii) some parties would seek relief by the application of differential rates, and the Local Government Act 1989 ties differential rating to the CIV rating system.

The objections to the remedy (supposedly backed by reason (i) just above) are explained at some length in Argument 11: "The Fallacious Argument that SV Rating is No Longer Necessary" in "Concise Statement of Arguments in Favour of Site Value Rating". In essence, it would be shifting the problem to innocent people, who would then suffer even more than the present complainants.

The objections to the remedy (supposedly backed by reason (ii) just above) are that

- (a) differential rating is a difficult and discriminatory process, well explained by the Hon R M Hallam (now the Minister for Local Government, but then in Opposition) and the Hon K. Wright in the Legislative Council on 3 August 1988.
- (b) that the connection of differential rates with CIV rating is artificial and only makes the situation worse.

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The link between differential rates and the CIV rating system seems to be that, to rate payers who have experienced the SV system, CIV rating introduces such obvious inequities that they need fixing, and differential rates are introduced in an attempt to patch up faults in CIV rating.

But differential rates bring in further difficulties, so well understood and explained by the Honourable Members Hallam and Wright.

If differential rates are to be introduced, difficult and dangerous though they be, they are best introduced directly and not paired with the undesirable CIV rating.

The obvious and fundamental long term solution is that valuation of properties and assessment of rates be brought closer together in time. With the simple SV system, desirable as well on other grounds, it would be realistic to aim for annual valuations, to be applied during the year following valuation.

III. *The lesser evil - Separating Differential Rates from CIV rating*

To allow a council to introduce differential rating without having to link it with CIV rating, it appears that the following changes to the Local Government Act 1989 would suffice:

Section 157: Omit sub-section (4);

Section 158: Omit the words in parenthesis in (1) (b) (ii);

Section and sub-section 161 (1): Omit the words: "which is permitted to do so, under 157 (4)"

(Optional) Section and sub-section 161 (4): Omit the words: "which does not use the capital improved value system for valuing land".

3.2.2 Major Capital Projects

The recommendation, your point No.8 - That further flexibility be given to 'large Scale Capital Projects', begs the question: What about the smaller scale developer?

The 1980's has shown us effects of pandering to large scale entrepreneurs. It should also be noted that SV does not penalise any developers, because development would not be taxed under Site Rating.

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5. Effects of the Proposed Changes:

Simply:

The *elv* system of rating discourages improvements by taxing them, and promotes slum development by under-taxation.

Over use of land is easy to stop by zoning, but in a free market economy such as ours, the only way to stop under use of land is to put the profit motive to work and make it more profitable to improve a property than to let it decay.

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Attachment I

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General Summary Of Our Position

The following advantages can be claimed for 'site-value' rating:

- (a) Property owners gain more incentive to develop their land when improvements are not taxed reflecting both practical and psychological reactions.
- (b) Site values are created by demand together with community-cost developments in the form of Local Government services, re-planning, road, harbour; drainage, amenity and sewerage works and it is right that some part of this unearned increment in land values should return to the community through property taxation or rating.
- (c) The value of land is more stable, whereas ~~improved~~ values must be kept constantly under review to allow for changes and additions to improvements.
- (d) Site value rating gives owners incentive to put land to its best possible use.
- (e) Where 'CIV' forms the basis of rating the assets (in terms of buildings) of industrial and other income earning properties are double taxed, once on the income produced and secondly from taxation or rating based on their capital or 'annual' value.
- (f) Employment in the building industry is often stimulated not only in relation to new buildings but also in respect of repairs to old premises.
- (g) It gives the State, i.e. the community, some share in increments in land values attributable for example to re-planning while giving rating equity to property owners whose values are adversely affected.

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APPENDICES

Municipal Rating Polls In Victoria

- 2 Results Speak For Themselves
- 3 Consideration Of The Merits Of Site Value Rating
- How Site Value Rating Benefits The Farmer
- 4 How To Beat The Current Depression By Generating More Employment
- 5 Key To Decentralisation
- 6 Sale Leaflet
- 7 A Study

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Attachment I

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Item 3

Attachment I

Appendix 1

Municipal Rating Polls In Victoria

GENERAL COUNCIL FOR RATING REFORM

ADVOCATING THE RATING OF SITE-VALUES INSTEAD OF IMPROVEMENTS

July 1992

MUNICIPAL RATING POLLS IN VICTORIA

BOX 9SSG, G.P.O.
MELBOURNE, 3001

History

Before 1920, all councils in Victoria were required to use net annual value (NAV) rating. In December 1919 it was made possible for councils to change to site value (SV) rating (actually UCV at the time), and back again to NAV, by either of two methods: (i) Council resolution, or (ii) voter initiative in calling and winning a poll. Also, if Council resolved to change the rating system, voters had one month in which to demand a poll in order to attempt to reverse Council's decision.

By now, 50% of the people of Victoria are in SV-rating municipalities. (There is a larger number of NAV-rating than SV-rating municipalities, due to the many rural municipalities with small population using NAV. Currently, of the 210 municipalities in Victoria, 57 use SV rating.)

Abolition of Historical Democratic Rights

The 1989 Local Government Act, when fully proclaimed (October 1992), will abolish the democratic right of voters to initiate a poll.

Also, by the "old" 1958 Act, Council was required, before a poll, to give each ratepayer a statement showing how much he/she would have to pay under each system; the 1989 Act does not require any information to be provided.

In addition, Council was required, for the next three years after the poll, to act in accordance with the result of a poll won by the voters. In the 1989 Act, a winning poll prohibits a Council from proceeding "with its decision", but allows a Council to move a motion to change the rating system again at any time.

Past Use by Voters of their Power to Initiate Polls

Of the 114 changes and attempts to change the rating system in Victoria since 1920, 64 have been by voters initiating a poll to change to SV rating. A majority was obtained for SV in 48 of them, and for NAV in 16. The large number of polls for changing to SV is not surprising, of course, as all were on NAV to start with; it is the success rate of 75% which is remarkable. That is:

Voters have exercised their democratic right to initiate a poll frequently and effectively.

Voters have that they are prepared to vote "Yes", even in order to adopt a system which is, to them at the time, untried.

Past Use by Voters of their Power to Challenge Councils' Decisions

From the not large number of Councils rating SV, there have been 29 attempts by Councils to revert towards NAV. ("towards" is used, to include the infrequent half-way case of composite ("shandy") rating.)

On 23 of those 29 occasions, 10% of the voters succeeded in demanding a poll, and reversed Council's decision in 21 of them, usually with an increased majority for SV. That is:

It is typical for Councils to attempt to revert towards NAV rating, and for voters to very strongly resist.

A great majority of voters who have (in most cases) experienced both systems, show themselves as very determined to retain SV rating.

General Council for Rating Reform - Box 955G, G.P.O., Helbourne, 3001.

July, 1992.

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VOTERS'and COUNCILS' USES of their POWERS under THE 1958 ACT and its PREDECESSORS

Before 1920, all municipalities in Victoria used the net annual value (NAV) system of rating, as that was the only system made available for use by Victorian legislation. In this system, the rates are assessed on the value of the land, plus the value of the owner's own improvements.

From 1920, Victorian legislation allowed also the unimproved capital value (UCV) system of rating (practically the same as site value (SV)). In this system, the rates are assessed only on the value of the land occupied. The legislation treated both systems equally.

From 1968, collection of rates by the use of the NAV and SV systems in any proportion, uniform for the municipality, was made available.. This was called the "shandy" system. To the present time, a "50/50" proportion has been the only one proposed or used.

The sections of the 1958 Act used have the following meanings:-

- s. 316 Council using NAV resolve to adopt the SV or a shandy system.
If there is a poll, it is because, in one month, 10% of voters resist the Council resolution, demanding a poll.
- s. 317 10% of voters initiate a demand for a poll to change from NAV to SV or to shandy.
- s. 319 Council using SV or shandy resolve to change to shandy or to NAV.
If there is a poll, it is because, in one month, 10% of voters resist the Council resolution, demanding a poll.
- s. 321 10% of voters initiate a demand for a poll to change from SV or shandy to another system.

Municipality	Year	Section	System of rating			Formal votes			% - age for SV
			Before	Proposed	Result	For SV	Not SV	Total	
Caulfield	1920	316	NAV	SV	SV	No poll			
	1969	319	SV	Shandy	Shandy	No poll			
	1985	319	Shandy	NAV	NAV	No poll			
Coburg	1920	316	NAV	SV	SV	No poll			
Dandenong	1920	316	NAV	SV	SV	632	167	799	79
Essendon	1920	316	NAV	SV	SV	No poll			
Newtown	1920	316	NAV	SV	SV	No poll			
	1978	319	SV	Shandy	SV	1245	806	2051	61
Portland	1920	317	NAV	SV	SV	197	76	273	72
	1968	319	SV	NAV	NAV	3144	3594	7038	49
Rosedale	1920	316	NAV	SV	SV	No poll			
	1953	319	SV	NAV	SV	1281	244	1525	84
Oakleigh	1921	316	NAV	SV	SV	No poll			
	1945	319	SV	NAV	SV	1761	587	2348	75
	1985	319	SV	NAV	SV	14426	10278	24704	58
Yea	1921	317	NAV	SV	SV	318	220	538	59
	1951	319	SV	NAV	SV	1072	502	1574	68
Brunswick	1922	316	NAV	SV	SV	2395	2107	4502	53
	1932	319	SV	NAV	SV	4120	1794	5914	70
	1982	319	SV	Shandy	Shandy	No Poll			
Camberwell	1922	316	NAV	SV	SV	3399	2669	6068	56
	1970	319	SV	Shandy	SV	21890	13787	35677	61
Chelsea	1923	316	NAV	SV	SV	No poll			
Hordiali100	1925	317	NAV	SV	SV	809	509	1318	61
	1985	319	SV	NAV	SV	10026	4903	14929	67
	1991	319	SV	NAV	SV	8676	4136	12812	68
Sandringham	1926	317	NAV	SV	SV	2284	2098	4382	52
	1931	319	SV	NAV	SV	3069	1737	4806	64
Hamilton	1944	317	NAV	SV	SV	813	627	1440	56
Box Hill	1946	317	NAV	SV	SV	3378	2708	6086	56
Footscray	1946	317	NAV	SV	NAV	3161	11246	14407	22
Moorabbin	1946	317	NAV	SV	SV	3384	2159	5543	61

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Municipality	Year	Section	System of rating;			Formal votes			Age for SV
			Before	Proposed	Result	for SV	Not SV	Total	
Northcote	1946	317	NAV	SV	SV	7408	5626	13134	57
	1950	319	SV	NAV	NAV	6687	6815	13502	50
	1965	317	NAV	SV	NAV	10603	28821	39430	27
Preston	1946	311	NAV	SV	SV	1262	3527	10189	61
	1982	319	SV	NAV	NAV	No poll			
New	1947	311	NAV	SV	SV	3202	2996	6198	52
	1951	319	SV	NAV	SV	6021	5348	11375	53
	1975	319	SV	Shandy	SV	6206	2999	9205	61
Brighton	1948	317	NAV	SV	NAV	3541	6653	10200	35
Echuwa	1948	316	NAV	SV	SV	No poll			
Collingwood	1949	311	NAV	SV	NAV	1454	4848	6302	23
Frankston	1949	317	NAV	SV	SV	2511	1115	3692	68
	1953	319	SV	NAV	SV	3112	2335	5441	51
Heidelberg	1951	317	NAV	SV	SV	14211	1382	21593	66
Ringwood	1951	317	NAV	SV	SV	1905	1396	3301	58
Bellarine	1952	317	NAV	SV	NAV	179	1687	2466	32
Nunawading	1946	311	NAV	SV	NAV	1188	2553	3141	32
	1952	311	NAV	SV	SV	5801	4033	9834	59
	1986	321	SV	NAV	SV	33691	11221	44912	75
Wangaratta	1952	316	NAV	SV	NAV	1525	1585	3110	49
	1956	311	NAV	SV	SV	2115	510	2625	81
Woorayl	1952	311	NAV	SV	NAV	Not available			
South Barwon	1953	311	NAV	SV	SV	3023	2284	5307	51
Eltham	1954	311	NAV	SV	SV	3418	3128	6546	52
Sale	1954	317	NAV	SV	SV	1932	136	2668	72
Warrnambool	1954	316	NAV	SV	SV	No poll			
Castlemaine	1955	317	NAV	SV	SV	1860	1175	3035	61
	1967	319	SV	NAV	SV	3484	1267	4751	13
Malvern	1955	317	NAV	SV	SV	11758	6339	18097	65
	1961	319	SV	NAV	SV	25681	10140	35821	72
	1986	319	SV	NAV	SV	13951	4005	11956	78
Springvale	1955	316	NAV	SV	SV	No poll			
Broadmeadows	1956	311	NAV	SV	SV	5575	1743	1318	16
Mildura	1956	311	NAV	SV	SV	4619	1276	5895	78
Waverley	1956	317	NAV	SV	SV	10135	2302	13037	82
Keilor	1957	317	NAV	SV	SV	3948	1155	5103	71
Swan Hill	1957	317	NAV	SV	SV	1032	668	1100	61
Traralgon shire	1957	317	NAV	SV	SV	2620	2323	4943	53
Wodonga	1957	317	NAV	SV	SV	1345	877	2222	61
Ararat	1958	316	NAV	SV	SV	No poll			
Senalla	1958	317	NAV	SV	SV	2061	251	2318	89
Daylesford	1958	311	NAV	SV	NAV	Not available			
Moe	1958	317	NAV	SV	SV	1184	816	2660	67
St. Arnaud	1958	311	NAV	SV	NAV	366	834	1200	30.5
Wonthaggi	1958	311	NAV	SV	SV	1328	418	1746	76
Bairnsdale	1959	317	NAV	SV	NAV	Not available			
Doncaster T'stowe	1959	317	NAV	SV	SV	6492	6034	12526	52
Maffra	1959	317	NAV	SV	NAV	Not available			
Maryborough	1959	317	NAV	SV	SV	2399	1174	3513	67
Stawell	1959	317	NAV	SV	SV	1818	717	2595	70
	1989	319	SV	NAV	SV	2521	845	3366	75

Municipality	Year	Section	System of rating			Formal votes			Age for SV
			Before	Proposed	Result	For SV	Not SV	Total	
McIvor	1961	317	NAV	SV	SV	635	385	1020	62
Tallangatta	1961	317	NAV	SV	SV	1302	1034	2336	56
	1971	319	SV	NAV	SV	713	388	1101	65
Traralgon	1961	316	NAV	SV	SV	No poll			
Hastings	1962	317	NAV	SV	NAV	2868	3636	6504	44
Croydon	1963	317	NAV	SV	SV	8152	6203	14355	57
	1968	319	SV	NAV	SV	15040	9950	24990	60
Korumburra	1963	317	NAV	SV	SV	3211	2859	6070	53
Diamond Valley	1964	316	NAV	SV	SV	No poll			
South Melbourne	1964	317	NAV	SV	SV	10949	6506	17455	63
	1978	319	SV	Shandy	Shandy	No poll			
	1981	319	Shandy	NAV	NAV	Demand for a poll frustrated			
Bacchus Marsh	1965	317	NAV	SV	NAV	Not available			
Knox	1965	317	NAV	SV	SV	17432	11583	29015	60
Horwell	1965	317	NAV	SV	NAV	3673	7280	10953	34
Sherbrooke	1965	317	NAV	SV	SV	10617	5622	16239	65
Sunshine	1965	317	NAV	SV	NAV	14164	17763	31927	44
Cohuna	1967	317	NAV	SV	SV	2340	1594	3934	59
Healesville	1967	317	NAV	SV	NAV	1878	2975	4853	39
Kerang	1967	317	NAV	SV	SV	2408	2014	4422	54
	1967	316	NAV	SV	SV	2515	844	3359	75
(Note: Change of boundaries involved)									
Horsham	1969	317	NAV	SV	SV	2649	1437	4086	65
Kilmore	1970	317	NAV	SV	SV	338	311	649	52
Buninyong	1971	317	NAV	SV	SV	735	646	1381	53
	1979	319	SV	NAV	SV	1147	564	1711	67
Orbost	1972	317	NAV	SV	SV	1053	684	1737	61
	1986	319	SV	NAV	SV	2358	509	2867	82
Helton	1973	317	NAV	SV	SV	2682	2010	4692	57
Lilydale	1979	316	NAV	SV	NAV	10495	11683	22178	47
Broadford	1981	316	NAV	Shandy	Shandy	No poll			
Seymour	1981	317	NAV	SV	SV	1216	1158	2374	51

Note: A sharp decrease in the total number of votes which may be observed in a few cases about ---- 1969 is due to the elimination, then, of multiple voting based on property qualifications.

ANALYSIS

S.316 Used 20 times; that is, on 20 occasions, a Council using NAV resolved to go to SV (19 times) or to shandy (once, Broadford 1981). On 6 of those occasions, 10% of voters demanded a poll, and on 2 of those 6 Council's decision was reversed.

Used 64 times; that is, on 64 occasions, 10% of voters under a Council using NAV initiated a demand for a poll with the aim of moving to SV rating. In 48 of the polls, a majority of voters voted for SV; in 16 of the polls, for NAV.

Used 29 times; that is, on 29 occasions, a Council using SV or (in two cases) shandy resolved to go to shandy (6 times) or NAV (23 times). On 23 of those occasions, 10% of voters demanded a poll, and on 21 occasions, reversed Council's decision.

Used once, that is, on one occasion (Nunawading, 1986) 10% of voters in a municipality using SV initiated a demand for a poll to move to NAV. In the poll the majority for SV was 75%, increased from 59% in 1952.

Appendix 2

Results Speak For Themselves

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RESULTS SPEAK FOR THEMSELVES

Un-taxing of buildings invariably results in an immediate and pennant raising of the building construction level compared with that when they are (taxed).

This statement should have all the force of an axiom or self-evident truth. Its acceptance as such should not be dependent upon the production of proofs in operation. For anyone to argue that it will make no difference to peoples' willingness or ability to make improvements if they know that their action and expense in making those improvements will attract higher taxes is to insult his own intelligence and that of generally. The only uncertainty about the question in a normal businessman's mind would lie in the possibility of un-taxing improvements, not in the multiplication of the scale of their production if one succeeds in un-taxing them.

In the field of local government taxation in this and other countries the possibility of un-taxing improvements does exist. In Australia, most of the States have either done it already or are a long way along the path to doing so. For Australia as a whole, two-thirds of all the local government units have made that change. In other countries it only requires simple enabling legislation to enable them to do likewise.

Strange Belief

Nevertheless, it is found that there are people who profess to believe that un-taxing buildings and other improvements would have little or no effect on building activity. It has been said that if any substantial vested interest was concerned, there would not be lacking protagonists of the view that the earth is flat instead of a globe. And it is a fact that there are a lot of people who are interested in the vacant land industry rather than the building industries.

For implementation all that is needed is for that part of the local taxes which now falls on the composite value of the site-plus-the buildings to be changed so that it falls on the value of the site alone. The tax (rate) upon the building component would be reduced to zero and that upon the site component correspondingly increased to return the same overall revenue to the local authority as under the other alternative method.

The level of building construction is of vital importance to the community in general and those whose livelihood is bound up with the building construction industries in particular. The vacant lot industry gives little and uses few materials. The building construction industries are basic to the economy. They are the start point of the attack on land price inflation and on unemployment resultant from the decline in the building industries.

- Hence it is important to assess and publicise the extent to which the un-taxing of buildings will increase the level of building construction. This is important here and even more so abroad, where application is less general and factual data less readily available.

Observed Results

We propose in this and following issues to give the observed results of the stimulation to building construction after (as compared with before), shifting local taxes from to sites. The information has been supplied by the Land Values Research Group by analysis of official data from the Bureau of Census and Statistics. The Group's earlier publication "Public Charges On Land Values" has

shown the superior general performance of the three States, Queensland, New South Wales and West Australia in which the changeover to site value taxation is almost complete. In these it is not possible to study the quantitative effects between one local authority and another. The stimulative effect can be studied in considerable detail in Victoria and to lesser extent in South Australia. We will show progressively what happened to building before and after the various specific local units changed over.

The aim will be to show the number of values of dwelling permits and the values of permits issued for other building activity for two or three years before and four or more years after the change took place. Primary importance is given to the numbers and values of the dwellings, which are the basic and most stable building construction content. New industrial and commercial buildings are more capricious from year to year and alterations and additions a small part of the total. Their content can be found by deduction from the figures for value of total building activity of that shown for the dwellings (i.e. houses and flats).

Rural Areas

There are fluctuations from year to year in the building levels over the state as a whole due to general economic and seasonal conditions. The pattern for the Melbourne metropolitan too is a little different from the rural areas comprising the rest of the State of Victoria. Commencing with the calendar year 1955 and extending to 1965 a year-by-year index of the dwelling commencements in rural councils taxing improvements has been prepared. The figure for 1955 was taken as base 100 and the later years related back to it. The sequence of years and commencement percentages in brackets on this index is: 1955 (100), 1956 (88), 1957 (88), 1958 (93), 1959 (105), 1960 (87), 1961 (77), 1962 (76), 1963 (87), 1964 (87), 1965 (92). This index is confined to the rural councils taxing buildings.

Applying this index to the commencements recorded for a particular council in its last year of taxed buildings enables it to be how many commencements could have been expected if the change to untaxed buildings had not been made. This index has been used to derive the figures shown in brackets in the places listed below, which show the rural councils which abolished local taxes on buildings in that 10 year period.

Why Rural Councils?

There are now 62 councils in Victoria which have abolished local taxes on buildings out of a State total of 210 councils. The figure of 62 includes 30 in the Melbourne Metropolitan Division and the remaining 32 in the rural Divisions of the State. We show below (and will continue in later issues) the figures for the rural areas because conclusions beyond dispute can be readily drawn from them. With the Melbourne Division even more impressive figures could be shown for most of the suburban cities and shires which have un-taxed buildings. But their significance could be discounted on the grounds that the metropolitan population is expanding rapidly and have to go somewhere. It could be said that the new settlers' choice of suburbs which have un-taxed buildings was coincidental. If there is growth in rural areas, it must come from developing their own local resources. Most of these rural councils had shown little population growth for years until they un-taxed buildings. In many population had actually been declining with the

EFFECT UPON PRIVATE BUILDING CONSTRUCTION OF ADOPTION OF LOCAL TAXES ON BUILDINGS

Below are the private building permit totals for years immediately before and after change to site-value rating with simultaneous removal of local taxes on buildings - for Victorian councils in provincial centres. (0) The figures in brackets are those have been expected had to be rated. They apply to the level at change the same percentage increase as recorded by the average of provincial municipalities rating NAV for the years.

UCV = Unimproved Capital Value (land only),

NAV = Net Annual Value (land plus buildings).

Municipal Year ended 30th Sept.	Rating System	Dwelling Permits			Total Value All Building Permits		Municipal Year ended 30th Sept.	Rating System	Dwelling Permits			Total Value All Building Permits	
		No. 0	Value (£000'.) 0		(£000'.) 0	No. 0			Value (£000'.) 0	(£000'.) 0		(£000'.) 0	
ARARAT CITY													
1961	uev	32 (22)	149	(77)	213	(101)	1961	Uey	59 (52)	251	(182)	385	(331)
1960	Uey	40 (25)	149	(87)	219	(114)	1960	uev	88 (58)	345	(206)	513	(374)
1959	Uey	34 (30)	128	(105)	181	(137)	1959	Uey	76 (70)	306	(248)	412	(451)
1958	uev	28 (26)	93	(93)	143	(121)	1958	Uey	70 (62)	282	(220)	359	(399)
1957	NAY	25	88		115		1957	NAY	59	208		378	
1956	NAY	19	64		86		1956	NAY	70	239		345	
BENALLA BOROUGH (NOW CITY)													
1961	Uey	45 (28)	170	(98)	256	(174)	1961	Uey	89 (71)	352	(206)	619	(367)
1960	Uey	51 (32)	222	(110)	322	(196)	1960	Uey	83 (80)	285	(232)	514	(414)
1959	Uey	51 (38)	190	(133)	266	(237)	1959	Uey	117 (97)	406	(280)	542	(500)
1958	NAY	34	118		210		1958	Uey	141 (86)	505	(248)	836	(443)
1957	NAY	36	125		165		1957	Uey	127 (81)	430	(235)	682	(419)
1956	NAY	39	133		229		1956	NAY	81	235		419	
CASTLEMAINE TOWN													
1958	uev	43 (27)	134	(73)	161	(87)	1955	NAY	79	256		394	
1957	Uey	36 (26)	95	(70)	134	(83)	1959	Uey	121 (84)	440	(236)	724	(348)
1956	uev	36 (26)	99	(70)	134	(83)	1958	Uey	111 (74)	390	(209)	687	(308)
1955	Uey	31 (29)	96	(79)	108	(94)	1957	Uey	111 (70)	387	(198)	673	(291)
1954	NAY	29	79		94		1956	Uey	91 (70)	321	(198)	434	(291)
1953	NAY	40	80		98		1955	Uey	81 (80)	233	(225)	448	(331)
MILDURA													
1961	Uey	66 (60)	257	(175)	656	(327)	1954	NAY	80	225		331	
1960	Uey	82 (68)	277	(197)	393	(370)	1953	NAY	62	172		317	
1959	Uey	84 (82)	305	(238)	528	(446)	WONTHAGGIBOROUGH						
1958	Uey	117 (73)	405	(211)	624	(395)	1964	Uey	25 (6)	58	(12)	89	(18)
1957	Uey	86 (69)	260	(200)	487	(374)	1963	Uey	24 (6)	53	(12)	98	(18)
1956	NAY	69	200		374		1962	Uey	18 (6)	38	(11)	53	(17)
1955	NAY	78	210		393		1961	uev	17 (6)	47	(11)	52	(17)
MOE BOROUGH (NOW CITY)													
1962	Uey	92 (53)	301	(136)	580	(257)	1960	uev	17 (8)	46	(12)	57	(19)
1961	uev	84 (54)	281	(138)	439	(261)	1959	Uey	3 (7)	10	(15)	30	(23)
1960	uev	74 (61)	267	(156)	432	(295)	1958	NAY	6	13		20	
1959	Uey	72 (73)	226	(188)	326	(355)	1957	NAY	3	11		28	
1958	NAY	65	166		314		1956	NAY	7	21		30	
1957	NAY	70	182		223		1955	NAY	6	9		11	
1956	NAY	44	110		207		1954	NAY	9	15		15	
KORUMBURRA SIURE (t)													
1967	Uey	27 (11)	274	(116)	616	(212)	1967	Uey	27 (11)	274	(116)	616	(212)
1966	Uey	32 (10)	315	(102)	593	(163)	1966	Uey	32 (10)	315	(102)	593	(163)
1965	Uey	14 (9)	108	(98)	392	(156)	1965	Uey	14 (9)	108	(98)	392	(156)
1964	Uey	17 (9)	148	(93)	188	(137)	1964	Uey	17 (9)	148	(93)	188	(137)
1963	NAY	7	78		170		1963	NAY	7	78		170	
1962	NAY	13	112		210		1962	NAY	13	112		210	
1961	NAY	10	94		112		1961	NAY	10	94		112	
1960	NAY	11	88		138		1960	NAY	11	88		138	
SALE CITY													
1958	Uey	36 (31)	116	(86)	211	(138)	1967	Uey	27 (11)	274	(116)	616	(212)
1957	Uey	36 (29)	109	(82)	140	(130)	1966	Uey	32 (10)	315	(102)	593	(163)
1956	uev	39 (29)	114	(82)	174	(130)	1965	Uey	14 (9)	108	(98)	392	(156)
1955	Uey	33 (33)	99	(93)	235	(148)	1964	Uey	17 (9)	148	(93)	188	(137)
1954	NAY	34	93		148		1963	NAY	7	78		170	
1953	NAY	43	112		180		1962	NAY	13	112		210	
1952	NAY	48	110		238		1961	NAY	10	94		112	
SWAN HILL BOROUGH (NOW CITY)													
1961	Uey	49 (31)	177	(80)	354	(108)	1960	NAY	11	88		138	
1960	Uey	38 (36)	128	(90)	203	(122)	Note: (t) With the exception of Korumburra all the values shown, above are in £000's. To convert to \$(Aust.) the figures will need to be doubled. The Korumburra values shown are in \$(Aust.)						
1959	Uey	53 (43)	166	(109)	299	(147)							
1958	Uey	26 (38)	107	(96)	214	(130)							
1957	NAY	36	91		123								
1956	NAY	38	124		175								

Note: (t) With the exception of Korumburra all the values shown above are in £000's. To convert to \$(Aust.) the figures will need to be doubled. The Korumburra values shown are in \$(Aust.).

'drift to the metropolis'. The increased growth rate - compared with that which could have been expected had continued to be taxed - is invariably in evidence. It is rightly credited to the stimulation of ratepayers to make more and better improvements on their properties in the knowledge that they won't be fined for their own effort in doing so as in the past.

Significant Changes

Examination of the twelve cases above shows that in each the building construction level had risen greatly by the fourth year following un-taxing improvements. The value of new dwellings had risen to approximately double the

level that could have been expected had improvements continued to be taxed. This has had repercussive beneficial effects in increased trade and employment prospects through the local community. In most cases the step up commenced in the first year following the change or decreasing tendencies previously evident have been quickly reversed. The same pattern will be seen in the later councils to un-tax buildings.

It is significant that the step-up in values of the dwelling permits after the change is substantially greater than the proportionate increase in the numbers of dwellings. This shows that people are encouraged to build better and more expensive buildings when they know they will not be penalised for doing so.

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Box 955 G., Melbourne. Vic. 3001.

Appendix 3

Consideration Of The Merits of Site Value Rating
How Site Value Rating Benefits The Farmer

HOW SITE-VALUE RATING BENEFITS THE FARMER

Statement prepared by A. R. Hutchinson, n.sc., A.M.I.E. Aust.,
Holl. Research Director, Land Values Research Group,
at the request of the Develop Victoria Council.

The description "farmer" sometimes is used loosely as covering anyone who owns rural property. However, it is necessary to differentiate between the genuine farmer who lives and works upon his holding and those who simply hold rural property under-developed as an investment. The effects upon the two are dissimilar. The test of separation for the genuine farmer we take to be residence upon holding. It is with the interests of such resident farmers that we are concerned.

First Used in Rural Areas

That shifting basis of local rating from the value of his buildings, cultivation and other farm improvements to the value of his site alone is to the advantage of the farmer is shown below.

In the first place site-value rating was first developed and applied to farming communities and only extended to towns and cities after its suitability for farmers had been demonstrated. It was first applied to the Shires of Queensland in 1887 specifically to ease the position of genuine farmers who were required by the net annual value basis to pay more than their own share of municipal costs to make up for token payments of undeveloped property holders. Its success in the shires led to its extension three years later to towns.

In New South Wales it was first applied to the shires and later to the urban areas. In West Australia it was applied to the Road Districts (equivalent to our Shires) in 1902. Only in 1948 were the 21 urban municipalities given optional powers to use it.

Site-value rating has since extended to become the dominant system in Australia. It is used in approximately two-thirds of all local government units. Those using it comprise more than 92% of the municipalized area of the continent. The fact that only 8% of total area has not yet changed over shows its appeal has been primarily to rural communities. Those rural parts of Victoria which have not yet changed over are among this small balance still taxing buildings and cultivation. There is no public demand in other States to return to that discarded system.

The three States of Queensland, New South Wales and West Australia apply site-value rating universally to farming properties. In South Australia, Victoria and Tasmania a minority only of rural areas use the site-value basis. Factual comparisons of development between these two groups as units show that the farmers generally are in a far sounder position in site-value rating States which tax only potential than in those taxing actual development.

New Farms Established

In land value rating States the price of land is kept at a lower level speculation discouraged. This enables new farmers to buy land and have capital left to develop it. Hence it has been possible to extend the area under cultivation in the site-value rating States while land has been taken out of cultivation in the other States. Over the depression years 1930 to 1939 total acreage in the site-value rating States increased by 21%. That in the Nett Annual Value

rating States decreased by 8%. Each State in the site-value group showed increase while each in the other group showed decrease. Similarly in the post-war years 1947 to 1959 acreage cultivated in site-value rating group increased by 35%. That of the N.A.V. rating group decreased by 1%.

Farmers' Economic Position Better

The farmers in the land value rating States have improved their economic position relatively and are better off than in the States where development is locally taxed. Comparing rural holdings of £5000 unimproved value upwards in site-value rating group average value of improvements per holding was 40% greater than value of the land. In the improvement-taxing States average value of improvements per holding was 39% less than value of land. Primary producers' incomes in the site-value rating group average 10% greater than in the annual rating group. Reasons for these effects can be seen more clearly by examining the differences in their principle and incidence.

Principles Compared

Under the N.A.V. basis part of the rates falls upon the value of the land and part upon the value of the improvements. Site-value rating completely exempts [rom rates the landholders' own improvements (i.e., farmhouse and other buildings, fencing, clearing, cultivation, sown grasses, dams, etc.). To maintain the same total revenue to the council the part falling on the raw value of the land is increased.

There is therefore a remission of rates on improvements offset by increased rates upon the raw value of the land. Whether the result is a nett saving or increase for a particular holding depends upon its degree of development compared to the average of the whole district.

A farmer living and working upon his holding usually has a substantial value in his improvements (farmhouse and other buildings, fencing, clearing, cultivation, sown grasses, dams, etc.). The majority of such farmers make a nett saving under U.C.V. on balance. They are encouraged to develop in knowledge that any further development they make will be rate free.

Completely undeveloped holdings have improvements to offset and invariably pay more under U.C.V. rating. Such holdings are often held as investments by absentee owners little concerned with their development. The higher rates merely put them on a common footing with those who are adequately developing their holdings. Under N.A.V. they escape with less than their fair share which results that those making adequate development have to pay more than their fair share.

How Individual Farms Fare

How individual properties are affected depends upon their degree of development compared to the average for the shire as a whole. Degree of development is the improved capital value divided by the unimproved capital value. Holdings developed more than the district average will pay less on U.C.V. Holdings developed below the district average will pay more.

Some people have the impression that removal of rates from improvements and increasing them upon sites will relieve owners of residential and industrial property at the expense of farmers. This impression is wrong. It is based on recognition of the higher density of improvements per acre in the towns without noticing these are accompanied by much higher unimproved land value than with farmlands. In towns land value is often more per foot than it is per acre in farms. This results that the degree of development for resident-farmers in the distinctly rural area is about the same as for residential properties in the towns.

SUMMARY

Advantages of Site-Value Rating to Farmers who live and work upon their holdings are:

- (1) The great majority of farmers pay less in rates than under net annual value;
- (2) They frequently find the saving on their homestead holding sufficient to cover the rate payments on extra holdings used in conjunction and are able to use more land without extra outgoings in rates;
- (3) Farmers know where they stand and can develop their holdings in full confidence that their rates will not be increased by their own improvements;
- (4) Farmers build up greater assets and enjoy higher net income than under N.A.V.;
- (5) Farmers feel that their site-value rate is equitable in relation to that of their neighbors who will usually pay much the same per acre as themselves. This contrasts with net annual value rating which often charges developed holdings as much as 20 times that on adjoining undeveloped holdings of similar size.
- (6) It becomes less profitable to invest in land and hold it sterile. Investment holdings are either
 - developed or put on the market.
- (7) New farmers can therefore get land more cheaply and so establish themselves more soundly with better ability to cope with falling prices;
- (8) Development becomes economic on marginal holdings which would be uneconomic where subject to the higher rates of N.A.V.;
- (9) Development of the potential is accelerated to the farmers' and the nation's advantage;
- (10) Farmers gain by the better-balanced development of rural areas under site-value rating. This brings more local opportunities for their children in industry, building, transport and trade. It enables better educational facilities and other amenities to be provided and may prevent drift to the city.

The farmers resident upon and working their holdings benefit in lower rates under the site-value basis in the majority of cases just as do householders in the towns and in about the same proportions. The percentages of such farmers benefiting in some specific areas were: Keilor Shire 81%. Eltham Shire. 77%. Frankston and Hastings Shire 55%. Where the incidence is different it is usually the result of valuation anomalies. There are provisions for special "farmrates" to cover such cases.

What Farmers Who Have Experienced Site-Value Rating Think Of It.

The rural shires of Rosedale and Yea have used site-value (U.S.V.) rating since 1921. Reversion polls were taken in 1953 and 1959 respectively to find whether they wanted to retain it or go back to net annual value. The booth results below leave no doubt that farmers prefer site-value after experience of both systems.

ROSEDALE SHIRE

	Favor NAV	Favor UCV
Ceotre		
Rosedale	43	206
Toongabbie	20	95
Glengarry	21	118
Gormandale	21	59
Wenke's Cor....	49	32
Wurruk	4	127
Kilmory	21	59
Nambrok	33	37
Longford ..	11	90
Dutson	0	24
Callignee South	1	24
Cowwarr	1	161
Willung	0	32
Flynn ..	0	17
Wandocka ..	9	29
Sale	3	61
Seaspray	1	33
Stradbroke ..	6	63
Postal	0	14
Totals	244	1281

YEA SHIRE

	Favor NAV	Favor UCV
Ceotre		
Yea	223	541
Limestone	3	21
Murrindindi	25	47
Highlands	27	54
Molesworth	30	60
Glenburn	29	41
Homewood ..	59	21
Pheasant Ck.	10	94
Flowerdale ..	40	48
Postal ..	56	145
Totals ..	502	1072

Further copies of this pamphlet or of the primary production surveys of the Land Values Research Group listed below are obtainable from Mr. L. F. Bawden, Hon. Secretary, 52 Guildford Road, Surrey Hills, E.I.O., Victoria, at the prices shown. These include postage on single copies which would be substantially less with multiple copies.

"How Site-Value Rating Benefits the Farmer"

Statement prepared at the request of the Development Victoria Council * Price 9d.

"Primary Production Studies"

Rosedale Shire-Grazing & Dairy Farm Study	9d.
Mulgrave Shire-Farm Rates Study	1/6
Greensborough - Orchard & Poultry Farms Study	1/-
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Eltham Shire - North Riding Primary Producing Properties	9d.
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* Includes Postage.

Appendix 4

How To Beat The Current Depression By Generating More Employment

HOW TO BEAT THE CURRENT DEPRESSION BY GENERATING MORE EMPLOYMENT

All will agree that current levels of unemployment must be reduced to restore and extend prosperity.

The basic starting point for this is restoration of the building industries, the health of which is measured by the numbers and values of building permits issued by the local municipal councils.

These industries give direct employment which can have chain-reaction effects to stimulate more employment in other related industries supplying building materials. They also stimulate demand for other materials and services to furnish, equip and maintain them when built, all of which bring demand for more labor.

Government financial help is now being provided to enable a relatively few more people to build and buy new homes subject to high mortgage payments over many years.

What is not yet being adequately tapped is the fact that "municipal councils have it within their power directly to stimulate the building industries in their own municipalities through the use of the council's local rating powers.

They can and should enlist the co-operation of their ratepayers in making building improvements with the full assurance of the council that the ratepayers' own outlay on making those improvements-whether new buildings, alterations or additions to old *ones-will not attract increased municipal rates.*

Where your local council has already the Site Value rating basis it is already committed to the principle that its ratepayers will not be rated at all on the value of their improvements. There they pay only according to the value given to their sites by the availability to them of the council services.

The citizens do respond to the knowledge that their homes, businesses and other **improvements** they make on their sites will not attract higher rates. This is shown by comparing the numbers and of the building permits actually issued in the cities rating Site Values in the Melbourne Metropolitan Area with those still rating Net Annual Values, which do attract higher rates on the improvements.

TOTAL VALUES OF ALL BUILDING PERMITS IN MELBOURNE METROPOLITAN CITIES

Comparing the values of total permits issued over the initial three financial years 1966/67, 1967/68 and 1968/69 with those issued over the later three financial years 1975/76, 1976/77 and 1977/78 for each City.

PART A

Cities Rating on Site Values Only
(i.e. owners' improvements are untaxed)

CITY	Initial			Growth of Permits		
	three years	Final		Values	Proportion	
	\$ millions	\$ millions		\$ millions	Per Cent	
BOX HILL	17.593	36.570	+	18.977	-	108
BROADMEADOWS	39.377	93.257	+	53.880	+	136
BRUNSWICK	10.688	21.186	+	10.498	+	98
CAMBERWELL	27.612	46.751	+	19.139	+	69
CHELSEA	7.516	16.306	+	8.790	+	117
COBURG	11.189	40.699	+	29.510	+	264
CROYDON	25.251	40.799	+	15.548	+	62
DANDENONG	23.030	93.205	+	70.175	+	305
DONCASTER	67.644	113.578	+	45.934	+	68
ESSENDON	11.740	47.235	+	35.495	+	302
FRANKSTON	37.568	118.360	+	80.792	+	215
HEIDELBERG	35.344	68.708	+	33.364	+	94
KEILOR	30.911	109.173	+	78.262	+	253
KEW	14.464	26.092	+	11.628	+	80
KNOX	62.355	146.949	+	84.594	+	136
MALVERN	19.671	28.829	+	9.158	+	47
MOORABBIN	48.346	65.212	+	16.866	+	35
MORDIALLOC	10.418	27.326	+	16.908	+	162
NUNAWADING	52.174	103.433	+	51.259	+	98
OAKLEIGH	37.318	73.927	+	36.609	+	98
PRESTON	31.535	61.319	+	29.784	+	94
RINGWOOD	21.859	43.393	+	21.534	+	99
SANDRINGHAM	11.127	20.785	+	9.658	+	87
SPRINGVALE	39.377	95.532	+	56.155	+	143
WAVERTLEY	70.602	152.496	+	81.894	+	116
TOTALS	764.709	1691.120		926.411	Avge. 121	

PART B

Two Metropolitan Cities Which Changed from Full Site Value Rating to a 50/50 Shandy Rate

CITY	<i>Initial three years (Site Value)</i>	<i>Final three years (Shandy Rate)</i>	<i>Growth of Permits</i>		
	<i>\$ millions</i>	<i>\$ millions</i>	<i>Values</i>		<i>Proportion per cent</i>
			<i>\$ millions</i>		
CAULFIELD	33.200	39.969	+	6.769	20
SOUTH MELBOURNE	26.572	25.668		.904	4
TOTAL	59.772	65.637	+	5.865	Ave. 10

PART C

Cities Rating Net Annual Value

	<i>Initial three years</i>	<i>Final three years</i>	<i>Growth of Permits</i>		
	<i>\$ millions</i>	<i>\$ millions</i>	<i>Values</i>		<i>Proportion per cent</i>
			<i>\$ millions</i>		
MELBOURNE	161.495	253.519	+	92.024	57
ALTONA	20.500	33.505	+	13.005	63
BRIGHTON	12.238	22.506	+	10.268	84
BELWICK	36.886	79.340	+	42.454	114
COLLINGWOOD	12.565	22.806	+	10.241	81
FOOTSCRAY	14.638	27.203	+	12.565	86
FITZROY	9.736	8.683		1.053	11
HAWTHORN	22.717	22.464		.252	1
NORTHCOTE	18.523	17.357		1.166	6
PORT MELBOURNE	9.413	9.024		.389	4
PRAHRAN	37.951	32.051		5.900	16
RICHMOND	11.286	31.575	+	20.289	180
ST. KILDA	25.122	9.481		15.641	62
SUNSHINE	32.014	111.995	+	79.981	250
WILLIAMSTOWN	8.358	21.452	+	13.094	157
TOTALS	433.442	702.961	+	269.519	Ave. 62

These comparisons show that ratepayers do respond and spend more money on improvements of all kinds when they know they will not be penalised with higher rate charges for their own commendable actions.

The overall proportion to which the building permit values have grown in the 25 councils in Part A (where improvements are untaxed) is about double that shown by the 15 councils in Part C (which tax the value of improvements).

In money terms the total value of the building permits issued by the 25 councils listed in Part A (which do not tax buildings) grew from the initial three year figure of \$764.7 millions to \$1691.1 millions in the final three year period giving a rise of \$926.4 millions (Le. 121%).

The corresponding figures for the 15 councils taxing the value of owners' improvements gave a growth from the initial figure of \$433.4 millions up to \$703.0 millions in the final period. THIS WAS A RISE OF ONLY \$269.5 millions. (i.e. 62%)

This stimulus has been achieved without any special action by the councils to capitalise on its possibilities to beat the depression. If these 25 councils enlist the help of their ratepayers in a deliberate campaign to improve their

properties, in the knowledge that it will help to generate employment and beat the depression, it will certainly work in the required

Not all ratepayers would be financially able to help it is true. But many ratepayers have savings which they spend to make alterations and additions to their homes or other buildings now instead of later. The solution to the depression requires that the tide turn to restore full and prosperity in the building industries and spread to others.

The 15 other city councils in the metropolitan area which still rate owners on the value of their own improvements should also take immediate steps to use their optional powers to change their rating basis to Site Value and seek the co-operation of their ratepayers likewise for the common good. So also should other councils which have not yet untaxed improvements in their areas.

The employment generating potential of un-taxing improvements has already been demonstrated above. Let us capitalize on it to get the full multiplier effect working for us to beat the depression and restore full employment.

A.R.H.

NOTE t The building content is inflated in these cases through the inclusion of educational and hospital buildings of high value which, in the main municipal councils affected, accounted for the percentages of the total building permits as shown in brackets against the name of the council:

Collingwood (48%); Essendon (43%); Fitzroy (27%); Heidelberg (46%); Richmond (58%); Williamstown (40%)

NOTE * This sign after the name of the Council means that it was proclaimed a city after the financial year 1966/67 with which the tables commence. In its case the initial three year period for which building permits are shown commences with the year: Altona. 1968/69; Berwick, 1973/74; Croydon, 1970/71; Knox. 1969/70.

Reprinted from 'PROGRESS'. January 1983 for the General Council for Rating Reform, GPO Box 9550.. Melbourne 3001. from which copies are available.

Appendix 5

Key To Decentralisation

POPULATION INCREASES 1954-61

Locality	1954 Census No.	1961 Census No.	Increase No.	Increase %
(A) WHERE IMPROVEMENTS ARE TAX-FREE				
Rating Unimproved Capital Value (Land only)				
Wodonga (N.M.)	5,259	7,498	2,239	42.5
Traralgon (B)	8,845	12,300	3,455	39.0
Wangaratta (B)	10,715	13,784	3,069	28.6
Warrnambool (C)	12,502	15,702	3,200	25.5
Portland (T)	4,809	6,014	1,205	25.0
Moe (B)	12,427	15,463	3,036	24.4
Benalla (B)	6,818	8,260	1,442	21.1
Sale (C)	6,537	7,899	1,362	20.8
Echuca (B)	5,405	6,443	1,038	19.2
Swan Hill (B)	5,197	6,186	989	19.0
Mildura (C)	10,972	12,279	1,307	11.9
Hamilton (C)	8,507	9,495	988	11.6
Castlemaine (T)	6,577	7,216	639	9.7
Ararat (C)	7,433	7,943	510	6.7
Average growth				21.8%

(B) WHERE IMPROVEMENTS ARE TAXED
Rating Net Annual Value (Land and Improvements)

Shepparton (C)	10,848	13,580	2,732	25.2
Warragul (N.M.)	5,324	6,405	1,081	20.3
Horsham (C)	7,767	9,240	1,473	18.9
Colac (C)	8,032	9,252	1,220	15.1
Ballarat (U.A)	48,030	54,880	6,850	14.3
Bairnsdale (N.M.)	6,398	7,427	1,029	11.6
Bendigo (U.A)	36,918	40,327	3,409	9.2
Maryborough (C)	6,827	7,235	408	6.0
Stawell (B)	5,463	5,506	43	0.6
Average growth				13.4%

(C) STATE ENTERPRISE TOWNS-

Morwell				
Yallourn (N.M.)	14,978	19,843	4,865	32.4

Source of figures is Census Bulletin No. 26 issued by Commonwealth Bureau of Census and Statistics.

N.M., non-municipal town; B., borough; C., city; T., town; U.A. urban area.

- Morwell rates N.A.V. while Yallourn is not subject to rating at all, being owned and operated by the State Electricity Commission.

Further copies are obtainable from:

Mr. L. F. Bawden, Secretary,
Land Values Research Group,
52 Guildford Road, Surrey Hills, E.O. Vic.

KEY TO DECENTRALISATION ?

By A. R. Hutchinson, B.Sc., A.M.I.E. Aust.

Research Director, Land Values Research Group.

Decentralisation of population and industry is the aim of a substantial section of citizens who believe there is something amiss when more than half of the Victorian population is concentrated in Greater Melbourne.

The decentralisation aim is general with members of rural and provincial councils, commerce and local development organisations but by no means confined to them. Much of the drive and direction for it comes from metropolitan citizens whose interest is unselfish, stemming only from their belief that the evident unbalanced growth will be altered only by direct action to remove its causes.

The recent report of the Distribution of Population Committee presented recommendations covering many contributory factors but surprisingly omitted some of the most important.

In a paper given at the National Conference on Balanced Development at Wagga Wagga in November, 1962, Sir Douglas Copland drew attention to the fact that certain large provincial towns had shown population growth rates since the 1954 census faster than that of Greater Melbourne. He suggested that we study these to learn the reasons and the lessons to be applied elsewhere. This was sound, practical advice for a new angle of approach to the problems. Let us see where it leads.

Between the of 1954 and that of 1961 the population of Greater Melbourne increased by 24.6 per cent. There were eight provincial towns outside the Central District, each with population of more than 5,000 at 1954, which showed a growth of 24 per cent or more in the same period. These were Moe, Morwell-Yallourn, Portland, Shepparton, Traralgon, Wangaratta, Warrnambool and Wodonga.

Morwell-Yallourn form a single complex whose growth is directly tied with the State Electricity Commission and the Gas and Fuel Corporation. Its growth is not under normal conditions as with other towns where growth must be linked to private investment rather than the public purse. Hence it can be excluded in the search for lessons applicable elsewhere.

31 Hardware Street Melbourne 3000
TAX REFORM AUSTRALIA

Considering the other seven fast-growing towns, one important characteristic stands out clearly. of the seven use the site-value basis "for municipal rating under which industrial, commercial and residential buildings and improvements are not penalised by rates levied on their value. This could be significant since one of the specific claims made by advocates of that system is that it will help development of the building construction and other industries on which population growth is dependent.

Following this lead, the provincial towns where the 1954 population was 5,000 or more have been arranged in the accompanying table to show those where municipal rates are levied on bare-land value, separately from those where buildings and other private improvements are rated. The figures for population at 1954 and 1961 are taken from Census Bulletin No. 26 issued by the Commonwealth Bureau of Census and Statistics. They are the final figures adjusted to take account of boundary changes between census years so that the same area is compared at both periods. Where the rating system has changed between census years the town has been grouped according to which system operated for the longer period.

The conclusion is warranted that freedom from local taxes on buildings and other improvements is a major common factor in the towns showing high growth rates. Ten of the 14 towns where improvements are rate-free show growth of more than 18 per cent. This compares with only three of nine rating improvements.

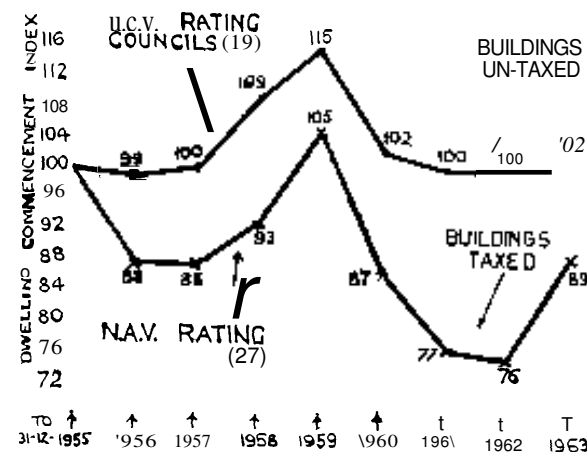
Indeed, it would surely be surprising if pursuit of a policy of tax-free buildings and other improvements did NOT stimulate growth markedly. Those engaged in the building construction industries are convinced that it does. Both the Building and Allied Trades Association and the Building Industry Congress (which together represent most of those engaged in the building industries) have endorsed this view and pressed for extension of rating on site-values with abolition of rates on buildings and improvements.

There are other contributory conditions but it seems clear that rural areas wanting the benefits of decentralisation and population growth have in their own hands the means to go a long way towards achieving it. This is for their municipal, water and sewerage authorities to stop rating improvements and to rate instead the bare-land value only. The Local Government Act gives councils and ratepayers the option on which system they use. Change can be made either by Council resolution or poll demanded by ratepayers.

The Distribution of Population Committee has recommended various forms of subsidies, concessions, incentives

and "er measures to assist decentralisation of population and industry. These are valuable aids to supplement the rating change but are not a substitute for it. The recommendations and the cessation of rating of improvements are complementary. It remains basically true that the disease of unbalanced growth in rural areas is like alcoholism - largely a self-inflicted one - to which the basic remedy is STOP TAXING IMPROVEMENTS.

RURAL DWELLING CONSTRUCTION IN VICTORIA



GROWTH OF PROVINCIAL TOWNS Between Census of 1954 and 1961

Below are details of population growth for all provincial cities, towns, boroughs and non-municipal towns (within shires) outside the metropolitan and central statistical districts, where the population was 5,000 or more at 1954 census.

They are arranged in two groups according to the municipal rating system in use. Where this has changed within the period the place has been grouped with that in force longest in the period.

Appendix 6

Sale Leaflet

THE CITY OF SALE

MAKES SPECTACULAR ADVANCEMENT UNDER SITE VALUE RATING WITH UN - TAXING IMPROVEMENTS

The city of Sale is located 207 Km. east of Melbourne near Lake Wellington in the beautiful Gippsland Lakes area of Victoria.

In 1954, the move to change from rating owners on the value of improvements and turn instead to rating on the value of the site alone was made. A factual survey showed that confining attention to holdings with buildings upon them, 1,251 (69%) would carry lower rates and only 564 higher rates under the Site Value basis. Of houses 1,152 (75%) would carry lower rates and only 387 carry higher rates under the Site Value basis.

Examination showed that the position of the secondary industries in Sale was poor. There were only five such comprising the Woollen Mill; a Butter Factory; an Iron Foundry; a Bacon Factory and a Flour Mill. All of those were being subjected to high rate penalties under the Net Annual Value rating system. The Woollen Mill, which was most heavily penalised of all, failed shortly before the rating poll was taken, but the premises were later taken over by J. J. Davies and Son following the change to Site Value rating.

When a poll was demanded by ratepayers and a proposal to change to the Site Value rating basis was put to the vote it was carried by 1,932 votes for Site Value to only 736 against.

the change to Site Value rating the population of Sale City increased from a total of 5,120 in 1948 to 14,500 in 1982: In the same period the number of dwellings increased from 1,540 to 4,200.

Other indicators of the extent of Sale's further development since making that change lie in the later additions to its range of industries and assets. In particular its natural gas and oil discoveries are of great importance to the city as the gas purification plant is operating in close proximity to it. Associated service companies have now established in Sale.

The most recent series of developments which cap all previous ones was reported in "The Age" newspaper (5.9.84). This report said that the Sale City Council is developing a \$22,300,000 shopping complex, making the residents of Sale effective shareholders in the venture.

The centre, one of the largest regional shopping malls in Australia, was opened on 29th October, 1984, by the State Treasurer, Mr Jolly. State legislation was passed to allow the scheme to go ahead and the council has spent \$3,300,000 in demolishing and re-building the old railway station at the site.

The project includes an enclosed air conditioned shopping centre, a \$900,000 pedestrian mall linked to the city's main shopping area and considerable parking space. Major tenants are Tarllet, Venture, Safeway, McEwan's and also 45 specialty shops. The project is one of the first undertaken for local government.

The key to Sale City's sustained record of advancement was the ratepayers' poll of August 1954. That scrapped the Net Annual Value rating basis which charged ratepayers on the value of their own outlay on buildings and improvements. Instead they now pay only according to the land value of their sites alone. This leaves ratepayers with full incentive to improve their properties to their own and the community advantage.

The following tables show, year by year, the rating basis used, numbers of dwelling permits issued, the values of the building approvals issued by the council according to the nature of the buildings involved.

The sources for the financial years ended 30th June from 1984 go back to 1967 inclusive and are those recorded in the Australian Bureau of Statistics returns to which its catalogue Nos. 8732.2 or 8702.2 refer.

The earlier series of figures which follow, cover the calendar years ended 31st December from 1959 back to 1948. They were recorded by the Victorian Government Statist and published in the Victorian Government Yearbooks.

The figures shown in the tables from year's 1948 to 1954 give the building statistics recorded in the year's when the rating basis was the Net Annual Value.

The figures shown for 1955 to 1959 (and the later period 1967 to 1982) give the comparative building performance under the Site Value basis.

SUMMARY OF SALE BUILDING DEVELOPMENT

According to Council rate basis in use

Years included	New dwellings (Nos.)	New dwellings (Values) \$ '000's	Other new buildings (Values) \$ '000's	Rating System
1967-84 (17)	2,548	55,697	43,859	S. V.
1955-59 (5)	144	876	644	S. V.
1949-54 (7)	424	1,644	948	NAV.

BUILDING APPROVALS

Issued Under Rating System Used By Council

Financial Years ended 30th June & Basis	Number of new dwellings	Value of Buildings (\$'000)			
		New	Alterations & Additions to dwellings	Other New buildings	Total all new buildings
1984 S.V.	172	7,270	264	13,592	21,126
1983 S.V.	119	5,134	465	2,466	8,065
1982 S.V.	192	7,498	230	5,037	12,764
1981 S.V.	181	6,276	158	3,527	9,960
1980 S.V.	129	3,722	117	1,947	5,786
1979 S.V.	97	3,091	23	1,495	4,609
1978 S.V.	40	1,294	169	922	2,385
1977 S.V.	102	2,657	53	780	3,490
1976 S.V.	128	3,048	46	1,283	4,377
1975 S.V.	97	2,008		1,537	3,654
1974 S.V.	302	4,447		2,396	6,951
1973 S.V.	221	2,607		2,850	5,576
1972 S.V.	113	1,384		1,415	2,939
1971 S.V.	III	1,268		873	2,312
1970 S.V.	109	1,189		1,988	3,310
1969 S.V.	248	2,112		938	3,190
1968 S.V.	94	1,000		506	1,586
1967 S.V.	93	881		307	1,277
1958 S.V.	36	232		190	422
1957 S.V.	36	218		62	280
1956 S.V.	39	228		120	348
1955 S.V.	33	198		272	470
1954 NAV.	34	186		112	298
1953 NAV.	43	224		136	360
1952 NAV.	48	219		257	476
1951 NAV.	83	340		257	597
1950 NAV.	105	360		31	391
1949 NAV.	61	182		24	206
1948 NAV.	50	137		131	268

A.R. HULCHINSON, Vice President.
Council for Reform
G.P.O. Box 955F, Melbourne 3001

from "PROGRESS", February 1985

Appendix 7

A Study

GENERAL COUNCIL FOR RATING REFORM

ADVOCATING THE RATING OF SITE-VALUES INSTEAD OF IMPROVEMENTS

October 1991

BOX 955G, G.P.O.
MELBOURNE, 3001

A STUDY:

THE RATING SYSTEM USED, AND ITS INFLUENCE ON INDUSTRIAL DEVELOPMENT

Particularly in Municipalities in the Melbourne Statistical Division

Motive for Study

The article reproduced from *The Melbourne Times* of 16 August 1989, reported the great concern of the Councils constituting the Inner Melbourne Regional Association (IMRA) about the loss of industry and jobs to the outer suburbs.

IMRA comprises all the municipalities except Prahran of the Inner Melbourne Statistical Region. All of the municipalities of the IMR use net annual value (NAV) rating, and most of the outer suburbs, particularly the most advanced industrially, use site value (SV) rating.

As NAV rating penalises every person or body develops a property, in proportion to the development, and site value rating does not, but gives an incentive to develop, it seemed that a major reason for the difference in the development for the two regions may be in the rating system used.

It was decided to extend an existing Australian Bureau of Statistics (ABS) study by showing the ADS quantities for the two rating systems separately.

Page 14 - The Melbourne Times - 16 August 1989

High hopes for zoning review

JOB LOSSES and ad hoc planning decisions in the inner city could be reduced by review of industrial zoning now being carried out for the Inner Metropolitan Regional Association.

All industrial zonings and controls in the municipalities of Collingwood, Fitzroy, Melbourne, Richmond, South St Kilda and Port Melbourne will be reviewed and "viable" industrial areas identified.

IMRA's executive officer, Mr Peter Tesdorpf, said the review is "long overdue". Recent studies

have shown that 20,000 jobs were lost from the inner city area in the past five years as industry moved to the outer suburbs, he said.

"We cannot just sit back and let industry jobs continue to leave the region."

Mr Tesdorpf said the review aims to lure industry back to the inner city by "cutting the red tape" of the industrial zoning and planning controls in the region were designed in the 1950s for a different industry. They are totally inappropriate for today," he said.

Consultants Henshall

Hansen Associates have already started work on the review. Part of their brief is to draw up new zoning maps to combat the "anti-industrial" bias of councils.

The economic and employment development committee, chaired by ex-Fitzroy mayor Mr Phil Burford, will direct the study.

IMRA's economic development officer, Mr John Holdsworth, said the review would form the basis of a clear, long-term strategy "to avoid the traditional conflict between councils and residents."

Article from Page 14 of *The Melbourne Times* 16 August 1989.

Item 3

Attachment I

General Council for Rating Reform - A Study on Rating Systems, Oct 1991 2

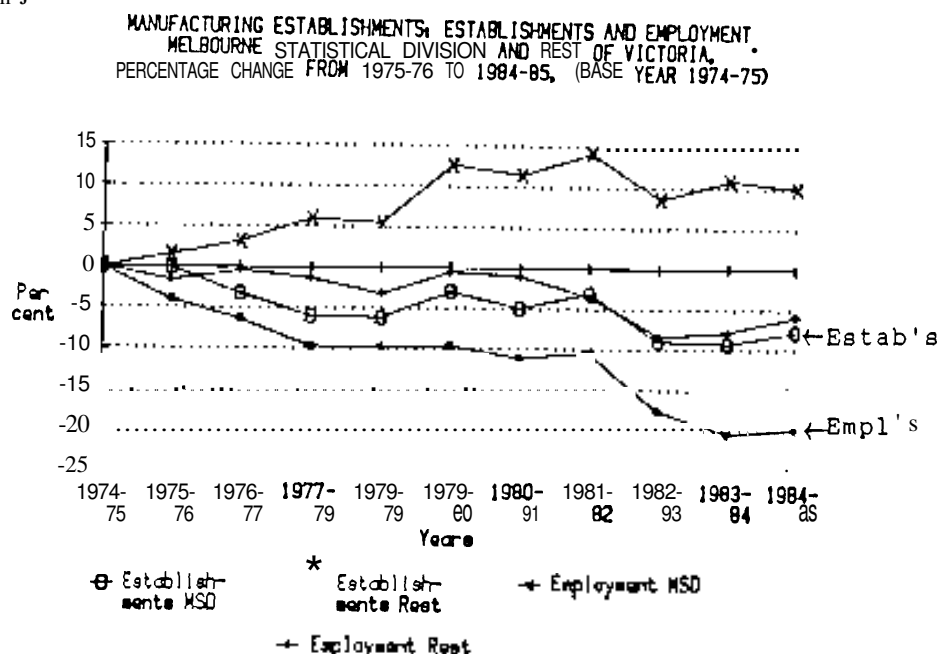
Portion of Page 2 of ABS Catalogue Humber 8203.2, 1984-85 (15 October 1986):

MSD compared with Rest of Victoria: Ten

Over a ten year period, taking 1974-75 as the base year, both establishments and employment decreased in the MSD. With 1983-84 recording the greatest difference of 9.3 per cent and 20.4 per cent respectively.

The pattern in the Rest of Victoria was somewhat different in that, although there was an overall increase in the number of establishments during this period, the level of employment declined by 5.9 per cent from 67,941 persons in 1974-75 to 63,915 persons in 1984-85.

Diagram J



Form of the Study

Above is a copy of the lower part of page 2 of ABS Catalogue number 8203.2 1984-85. The two curves picked out by the added labels "Estab's" and "Empl's" are the curves showing percentage changes from 1974-75 of number of establishments and average number of employees for the Melbourne Statistical Division (MSD). The two curves Dot picked out show the same quantities for the Rest of Victoria. The MSD is responsible for 80% of the industrial activity in Victoria, and so the curves not picked out may be disregarded as having little effect on the overall picture for Victoria.

The graphs on the next page show the results of adding the quantities separately for SV and for NAV municipalities, and plotting them. The municipalities used are shown in a table on a following page. Four were discarded, due to their not being either SV or NAV for the whole period.

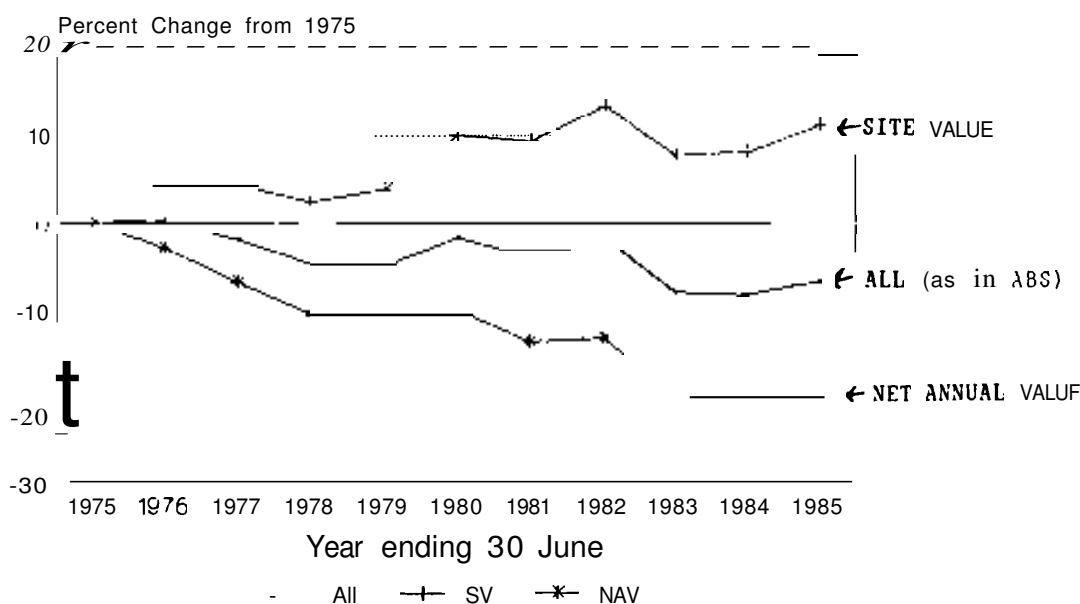
General Council for Rating Reform - A Study on Rating Systems, Oct 1991

3

The same quantities as calculated and plotted for the MSD on the ABS graph on page 2, but calculated and plotted separately for SV rating and for HAV rating municipalities, as labelled:

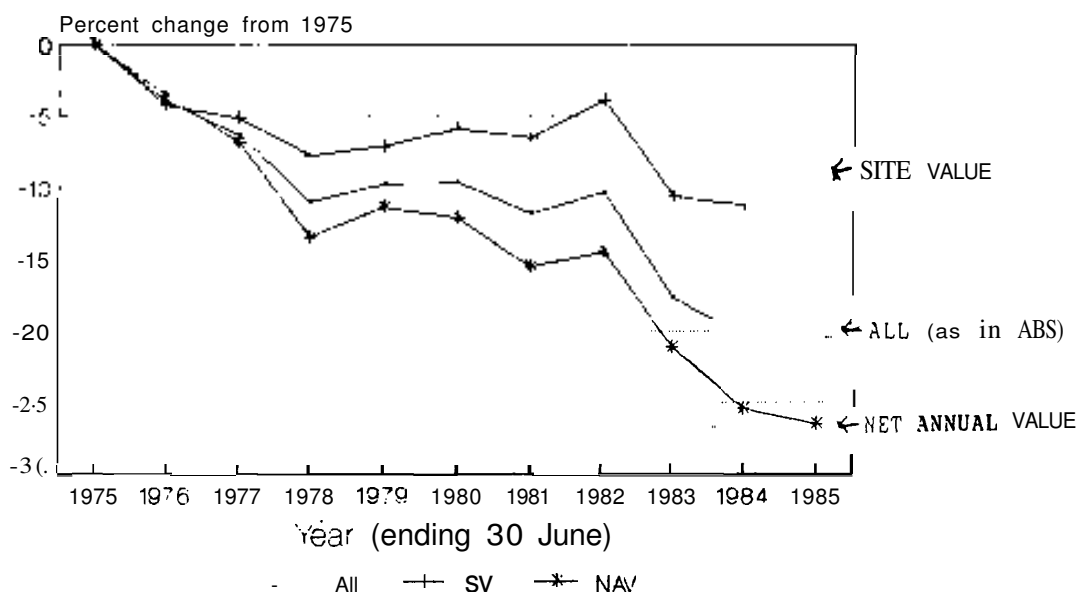
Number of Establishments - Rating System

Number of Establishments - Year



Number of Employees - Rating System

Average Number of Employees per Year



Item 3

Attachment I

General Council for Rating Reform - A Study on Rating Systems, Oct 1991

4

More Detailed Description of the Quantities Used in the Study

The graphs produced by the ABS and shown on page 2 are based on data collected by the ABS for each municipality, and then summed, for each year from 1974-75 to 1984-85 and published in Table 3 of their publication Catalogue Number 8203.2: "Manufacturing Establishments: Small Area Statistics, Victoria".

The data were of the number of manufacturing establishments satisfying the ABS definition operating in a municipality for the year, and the average number of employees employed in those establishments for the year.

Single establishments with less than four employees were disregarded, as ABS tests showed that this hardly affected the final figures, while the burden on the ABS, and on small businesses in recording and submitting the data, was greatly reduced.

The graphs on page 3 are based on the same data, but are summed separately by the GCRR for SV and for NAV municipalities.

The year 1974-75 was taken as the base year, and the percentage change from that base for each year was found and plotted up to the year 1984-85

Unfortunately the ABS did not collect the data for the year 1985-86, and collected it on a slightly different basis for succeeding years, so the graphs cannot be continued past 1984-85.

Result of the Study

The middle graph in the upper block on page 3 confirms the ABS graph on page 2, that the change in the number of establishments in the MSD decreased in general over the 10 years from 1974-75, with a decrease of about $6\frac{1}{2}\%$ in the 10 years.

However, the other two graphs in that upper block on page 3 show that the number of establishments for the SV rating municipalities increased by about 11% in that time, while for the NAV rating municipalities that number decreased by about 20%.

The middle graph in the lower block on page 3 confirms the ABS graph on page 2, that the number of employees in the MSD decreased by about 20% in the 10 years concerned.

The other two graphs in the lower block show that the number of employees in the SV rating municipalities decreased by about 9% in the 10 years, while they decreased by about 27% in the NAV rating municipalities.

There is clearly an outstanding difference between the average performance of the two classes of municipality, in favour of those rating SV. While this result is not a proof, it does support very strongly the argument that SV rating is far superior to NAV rating in encouraging industrial development in a municipality.

Appendix

The Appendix shows the municipalities in the study, and tables containing all the calculations on which the graphs are based.

APPENDIX

Table 1: Categories at Municipalities in Study

Municipalities in Melbourne Statistical Division (MSO)			
Rating on SV	Rating on NAV	Excluded	
Box Hill	Altona	Brunswick	(Changed)
8roadmeadows	Berwick	Caulfield	(Shandy)
Camberwell	Brigh ton	Preston	(Changed)
Chelsea	Bulla	South Melbourne	(Changed)
Coburg	Collingwood		
Croydon	Cranbourne (Part A)		
Dandenong	Fitzroy		
Diamond Valley	Flinders		
Doncaster & T'slove	tootscray		
Eltham	Hastings		
Es sendon	Hawthorn		
Frankston	Healseville (Part A)		
Heidelberg	Lilydale		
Keilor	Melbourne		
Kew	Mornington		
Knox	Northcote		
Malvern	Pakenham (Part A)		
Melton	Port Melbourne		
Moorabbin	Prahran		
Mordialloc	Richmond		
Nunawading	Saint Kilda		
Oakleigh	Sunshine		
Ringwood	Werribee		
Sand ri ngham	Whittlesea		
Sherbrooke	Williamstown		
Springvale			
Waverley			

Chr % Num.MPJ (for establishments (4 employees excluded)

Table 2: Change in Number of Establishments

APPENDIX

Melbourne Statistical Division - NUMBER OF ESTABLISHMENTS versus RATING SYSTEM USED

CHANGE in Number of Establishments COMPARED WITH Number in the base year of 1975

Rows 1, 2 & 3 contain original data; other values are computed

Parameter	Calculation	Base Year 1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985
1 Total for ALL municipalities	A	7,297	7,322	7,159	6,953	6,937	7,182	7,024	7,174	6,734	6,711	6,820
2 Total for SV nun's	S	3,163	3,291	3,297	3,245	3,285	3,478	3,458	3,582	3,409	3,422	3,515
3 Total for NAV nun's	N	3,217	3,129	3,000	2,884	2,859	2,894	2,781	2,794	2,590	2,548	2,580
4 Total for SV and NAV summed	S + N =B (Both)	6,380	6,420	6,297	6,129	6,144	6,372	6,239	6,376	5,999	5,970	6,095
5 Total for nun's excluded	A - B	917	902	862	824	793	810	785	798	735	741	725
6 ALL mun's: %age of base year	A / A(1975) =A%	100.00%	100.34%	98.11%	95.29%	95.07%	98.42%	96.26%	98.31%	92.28%	91.97%	93.46%
7 ALL mun's: %age increase from base year	A% - 100	0.00%	0.34%	-1.89%	-4.71%	-4.93%	-1.58%	-3.74%	-1.69%	-7.72%	-8.03%	-6.54%
8 SV mun's: of base year	S / S(1975) =S%	100.00%	104.05%	104.24%	102.59%	103.86%	109.96%	109.33%	113.25%	107.78%	108.19%	111.13%
9 SV mun's: %age increase from base year	S% - 100	0.00%	4.05%	4.24%	2.59%	3.86%	9.96%	9.33%	13.25%	7.78%	8.19%	11.13%
10 NAV mun's: %age of base year	N / N(1975) =N%	100.00%	97.26%	93.25%	89.65%	88.87%	89.96%	86.45%	86.85%	80.51%	79.20%	80.20%
11 NAV mun's: %age increase from base year	N% - 100	0.00%	-2.74%	-6.75%	-10.35%	-11.13%	-10.04%	-13.55%	-13.15%	-19.49%	-20.80%	-19.80%
12 SV & NAV of base year	B / B(1975) =B%	100.00%	100.63%	98.70%	96.07%	96.30%	99.87%	97.79%	99.94%	94.03%	93.57%	95.53%
13 SV & NAV mun's: %age increase from base	B% - 100	0.00%	0.63%	-1.30%	-3.93%	-3.70%	-0.13%	-2.21%	-0.06%	-5.97%	-6.43%	-4.47%

Ch-%-Num.XPJ (for establishments (4 employees excluded)

Table 2: Change in Number of Establishments

APPENDIX

Melbourne statistical Division - NUMBER OF ESTABLISHMENTS versus RATING SYSTEM USED

CHANGE in of Establishments COMPARED WITH Number in the base year of 1975

Rows 1, 2 & 3 contain original data; other values are computed

Parameter	Calculation	Base Year 1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985
1 Total for ALL ounicipalities	A	7,297	7,322	7,159	6,953	6,937	7,182	7,024	7,174	6,734	6,711	6,820
2 Total for SV mun's	S	3,163	3,291	3,297	3,245	3,285	3,478	3,458	3,582	3,409	3,422	3,515
3 Total for NAV mun's	N	3,217	3,129	3,000	2,884	2,859	2,894	2,781	2,794	2,590	2,548	2,580
4 Total for SV and NAV summed	S + N = B (Both)	6,380	6,420	6,297	6,129	6,144	6,372	6,239	6,376	5,999	5,970	6,095
5 Total for IIIII's excluded	A - B	917	902	862	824	793	810	785	798	735	741	725
6 ALL IIIII's: %-age of year	$A / A(1975) = A\%$	100.00%	100.34%	98.11%	95.29%	95.07%	98.42%	96.26%	98.31%	92.28%	91.97%	93.46%
7 ALL mun's: %-age increase from year	$A\% - 100$	0.00%	0.34%	-1.89%	-4.71%	-4.93%	-1.58%	-3.74%	-1.69%	-7.72%	-8.03%	-6.54%
8 SV mun's: %-age of year	$S / S(1975) = S\%$	100.00%	104.05%	104.24%	102.59%	103.86%	109.96%	109.33%	113.25%	107.78%	108.19%	111.13%
9 SV mun's: %-age increase year	$S\% - 100$	0.00%	4.05%	4.24%	2.59%	3.86%	9.96%	9.33%	13.25%	7.78%	8.19%	11.13%
10 NAV mun's: %-age of base year	$N / N(1975) = N\%$	100.00%	97.26%	93.25%	89.65%	88.87%	89.96%	86.45%	86.85%	80.51%	79.20%	80.20%
11 NAV mun's: %-age increase year	$N\% - 100$	0.00%	-2.74%	-6.75%	-10.35%	-11.13%	-10.04%	-13.55%	-13.15%	-19.49%	-20.80%	-19.80%
12 SV & NAV IIIII's: of year	$B / B(1975) = B\%$	100.00%	100.63%	98.70%	96.07%	96.30%	99.87%	97.79%	99.94%	94.03%	93.57%	95.53%
13 SV & NAV mun's: %-age increase from	$B\% - 100$	0.00%	0.63%	-1.30%	-3.93%	-3.70%	-0.13%	-2.21%	-0.06%	-5.97%	-6.43%	-4.47%

Submission #45534

Ch-%emp.MP3 (for establishments with < 4 employees excluded)

Table 3: Change in Average Number of Employees

APPENDIX

Melbourne Statistical Division AVERAGE NUMBER OF EMPLOYEES PER YEAR versus RATING SYSTEM USED

CHANGE in Average Number of employees per year COMPARED WITH in the base year of 1975

Rows 1, 2 3 contain original data; other values are computed

Parameter	Calculation	Base Year 1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985
1 Total for ALL municipalities	A	364,730	350,262	341,541	324,723	329,193	329,679	321,799	327,099	300,741	290,624	292,712
2 Total for SY IIII's	S	147,452	141,162	139,119	135,932	136,918	138,718	137,816	141,678	131,851	130,859	134,527
3 Total for NAV IIII's	N	177,488	171,203	165,267	153,720	157,311	156,044	150,068	151,846	140,090	132,308	130,461
4 Total for SY and NAV summed	S + N = B (Both)	324,940	312,365	305,038	289,652	294,229	294,762	287,884	293,524	271,941	263,167	264,988
5 Total for IIII's excluded	A - B	39,790	37,897	36,503	35,071	34,964	34,917	33,915	33,575	28,800	27,457	27,784
6 ALL IIII's: %age of base year	$A / 1(1975) = A\%$	100.00%	96.03%	93.64%	89.03%	90.26%	90.39%	88.23%	89.68%	82.46%	79.68%	80.27%
7 ALL IIII's: %age increase f base year	$A\% - 100$	0.00%	-3.97%	-6.36%	-10.97%	-9.74%	-9.61%	-11.77%	-10.32%	-17.54%	-20.32%	-19.73%
8 SY mun's: %age of base year	$S / 5(1975) = S\%$	100.00%	95.73%	94.79%	92.19%	92.86%	94.08%	93.46%	96.08%	89.42%	88.75%	91.23%
9 SY mun's: %age increase fran base year	$S\% - 100$	0.00%	-4.27%	-5.21%	-7.81%	-7.14%	-5.92%	-6.54%	-3.92%	-10.58%	-11.25%	-8.77%
10 NAV IIII's: %age of base year	$N / N(1975) = N\%$	100.00%	96.46%	93.11%	86.61%	88.63%	87.92%	84.55%	85.55%	78.93%	74.54%	73.50%
11 NAV mun's: %age increase fran base year	$N\% - 100$	0.00%	-3.54%	-6.89%	-13.39%	-11.37%	-12.08%	-15.45%	-14.45%	-21.07%	-25.46%	-26.50%
12 SY & NAV IIII's: %age of base year	$B / B(1975) = B\%$	100.00%	96.13%	93.88%	89.14%	90.55%	90.71%	88.60%	90.33%	83.69%	80.99%	81.55%
13 SY & NAV mun's: %age increase fran base	$B\% - 100$	0.00%	-3.87%	-6.12%	-10.86%	-9.45%	-9.29%	-11.40%	-9.67%	-16.31%	-19.01%	-18.45%

Submission #45850

Submission: Proposed City Vacant Differential Rate Category for vacant land in the Central City Business and (South Frame) Mixed Use Zones

We are making a submission on behalf of Jason Sumner Limited. As a landowner, we are deeply invested and connected to our city. It is important to us that our site is developed for the best long term use for the site, and that the development is enduring and contributes to the vibrant fabric of our city. Development of a site requires significant capital investment and an identified and required use with active occupants. In other words, development is demand driven. A project cannot be funded unless there is demand.

We believe that the timeframes for development need to also be put into context of a regenerating city that has also had to contend with the disruption of Covid for the last two years. Eleven years since an event of the magnitude of the Canterbury earthquakes of 2011 is not a significant amount of time given what is involved for the complete regeneration of a central city. We believe that it needs to be taken into account that in the years immediately after the earthquakes, the central city was cordoned off and red zoned and also there were ongoing aftershocks. Further, there would have been earlier demand for investment and development of privately owned vacant sites if the key anchor projects: the convention centre, the multi-use arena and the metro-sports centre had been commenced and completed earlier.

We strongly disagree with the proposed rate differential for vacant sites.

It has been stated publicly by an elected member that increased rates for vacant sites is a saver for the rate payer (which we assume is intended to be a saver for other ratepayers) and an inducement for the development of our city. Further, it has been stated that the additional money generated from the differential rate can be used to bring people back into the city.

As rationale for the policy, it is stated that the visual appearance of vacant sites can look uninviting to pedestrians and can influence negative perceptions of central Christchurch, and that this perception can discourage new investment in nearby sites. The policy does not apply to derelict buildings and we believe that the different treatment of vacant sites and derelict buildings unfairly penalises vacant sites.

We believe that the proposed differential rate is unreasonable and unlawful. It is noted that:

- Increasing the rating differential on vacant sites does not act as an inducement to develop the site. The increased rating differential is a penalty.
- Demand is required for site development and adding a rating differential on a vacant site is not going to generate demand. It may however result in a sub-optimal use of the land or development. We question whether an adequate assessment of the affects of the proposed policy has been undertaken.
- Use of additional funds collected from the rating differential to bring people back into the city targets a very small group of landowners with increased rates to benefit a far greater group of ratepayers. We also question what initiatives have been identified to create demand by bringing people into the city from the increased rates collected via the rating differential for vacant sites.

Submission #45850

To generate demand and support development, we believe the Council should look to at its operations, rating structure and the way in which it can support business and development. For instance, the Christchurch City Council's commercial rates are significantly more expensive than its neighbouring councils. By having a more expensive rates structure, the Council encourages investment in surrounding councils' areas rather than within the Christchurch City Council's boundaries. The Council can also look to making Christchurch a friendly place to do business. This can start with streamlining the consenting processes and being supportive of development. It can extend to a business friendly approach which promotes the central city as the place to locate businesses, which would result in increased interest in existing and new office and retail space.

Item 3

Attachment I

Submission #45847

Submission: Proposed City Vacant Differential Rate Category for vacant land in the Central City Business and (South Frame) Mixed Use Zones

We are making a submission on behalf of Nectar Limited. As a landowner, we are deeply invested and connected to our city. It is important to us that our site is developed for the best long term use for the site, and that the development is enduring and contributes to the vibrant fabric of our city. Development of a site requires significant capital investment and an identified and required use with active occupants. In other words, development is demand driven. A project cannot be funded unless there is demand.

We believe that the timeframes for development need to also be put into context of a regenerating city that has also had to contend with the disruption of Covid for the last two years. Eleven years since an event of the magnitude of the Canterbury earthquakes of 2011 is not a significant amount of time given what is involved for the complete regeneration of a central city. We believe that it needs to be taken into account that in the years immediately after the earthquakes, the central city was cordoned off and red zoned and also there were ongoing aftershocks. Further, there would have been earlier demand for investment and development of privately owned vacant sites if the key anchor projects: the convention centre, the multi-use arena and the metro-sports centre had been commenced and completed earlier.

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Item 3

Attachment I

Submission #45849

Submission: Proposed City Vacant Differential Rate Category for vacant land in the Central City Business and (South Frame) Mixed Use Zones

We are making a submission on behalf of Regent Limited. As a landowner, we are deeply invested and connected to our city. It is important to us that our site is developed for the best long term use for the site, and that the development is enduring and contributes to the vibrant fabric of our city. Development of a site requires significant capital investment and an identified and required use with active occupants. In other words, development is demand driven. A project cannot be funded unless there is demand.

We believe that the timeframes for development need to also be put into context of a regenerating city that has also had to contend with the disruption of Covid for the last two years. Eleven years since an event of the magnitude of the Canterbury earthquakes of 2011 is not a significant amount of time given what is involved for the complete regeneration of a central city. We believe that it needs to be taken into account that in the years immediately after the earthquakes, the central city was cordoned off and red zoned and also there were ongoing aftershocks. Further, there would have been earlier demand for investment and development of privately owned vacant sites if the key anchor projects: the convention centre, the multi-use arena and the metro-sports centre had been commenced and completed earlier.

We strongly disagree with the proposed rate differential for vacant sites.

It has been stated publicly by an elected member that increased rates for vacant sites is a saver for the rate payer (which we assume is intended to be a saver for other ratepayers) and an inducement for the development of our city. Further, it has been stated that the additional money generated from the differential rate can be used to bring people back into the city.

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Submission #45849

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Submission #45950



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14 April 2022

Principal Advisor Urban Regeneration
Christchurch City Council

Via "Have Your Say" Website

Attention: John Meeker

Dear John

Objection to proposal to increase rates on vacant central city land

1 We act for 91 Victoria Street Limited (**91 Victoria**), which has received notice from the Christchurch City Council (**Council**) of its intention to increase the rates payable on vacant central city land sites. The Council has provided an opportunity for feedback, and this letter is a **submission in opposition** as part of that process.

2 91 Victoria owns several properties in Christchurch, relevant for the purposes of this submission is the bare land site at 87 Victoria Street.

3 The issues identified in the "Have Your Say" consultation boxes are addressed below.

What do you think about the proposal to introduce a City Vacant differential of 4 for central city land with no active or consented use?

4 This proposal is **opposed**.

5 There are four key issues which 91 Victoria considers relevant to its opposition to the proposed rate increase, as follows:

- 5.1 The Christchurch City Council is currently seeking feedback on the rules it proposes to enable greater intensification, particularly in the Christchurch Central Zone. This intensification requirement is driven by national legislation, and indicates a shift in how our central cities will (and should) be developed. The outcomes of this Plan Change will have a significant impact on the development options available for this site, and it is unreasonable to be pressuring landowners into development now, when full development potential cannot be obtained under the current district plan rules.
- 5.2 Covid-19 has created uncertainty regarding development options. With changes in travel, how people live and do business, and increase in building supplies (at best – unavailability at worst), 91 Victoria is re-evaluating what is the best development for the site. Proposals for hotels or office space need to be considered in light of the 'new normal' imposed by Covid-19.
- 5.3 The proposed increase in rates is significant, particularly in addition to the base rates already paid. It is critical for the cohesive and productive development of Christchurch that these sites retain potential, and development must remain economically feasible. Currently, some of the proposals 91 Victoria is considering are 'break-even', the proposed rates increase would make them unviable.
- 5.4 Consideration needs to be given to vacant land sites in unique situations. The property at 87 Victoria Street neighbours the Victoria Mansions, and the intention of

Submission #45950

91 Victoria is to undertake a cohesive development across the properties. Decisions in relation to the Victoria Mansions site has been delayed (for various reasons, including insurance claim issues and the heritage values of the property). Any proposal needs to be in consultation with heritage experts, and is subject to additional consents, which causes additional delays. 91 Victoria considers that an interconnected development will provide the best outcome for Christchurch (and future users), however increased rates pressure may mean that option for development has to be discarded.

What do you think about the proposal to introduce a new rates remission for land kept in an improved and maintained state?

- 6 91 Victoria considers that this is critical, if the rates increase is to be imposed. 91 Victoria has had a productive discussion with Council and understands that there is a route for rates remission, however it also introduces additional cost. 91 Victoria agrees with the proposal that the remission can apply to hoarding, in situations where public access and improvement to a site isn't appropriate.

Where else do you think this could be applied and why?

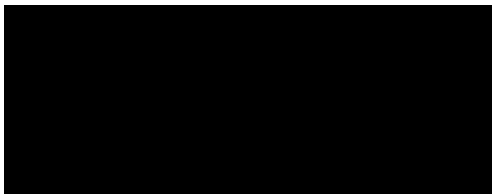
- 7 91 Victoria considers that rates remission should also be available at Council discretion, for sites with unique circumstances. As outlined above, the presence of the neighbouring heritage building has caused significant delays, and the Council should be empowered to grant relief to this site from increased rates.

Do you think that the Council should investigate options for increasing rates on derelict central city buildings, to ensure they contribute fairly to overall rates and to encourage them to commence repair work?

- 8 No. Many of the derelict central city buildings are heritage buildings, with many other complicating factors, in particular buildings identified as being an 'earthquake prone building' (such as the Victoria Mansions site). Unlike a vacant site, there is no easy 'fix' for these, and to impose rates increases may result in abandoned buildings, rather than repaired ones.

Hearings

- 9 91 Victoria would like the opportunity to speak to the Hearings Panel about this submission. Contact details are below.



Jamie Robinson
Associate



Submission #45951

Canterbury Employers' Chamber of Commerce
Submission on the Christchurch City Council Draft
Annual Plan 2022/23



April 2022

BACKGROUND

1. This is a submission from the Canterbury Employers' Chamber of Commerce ("The Chamber") on the Christchurch City Council ("the Council") Draft Annual Plan 2022/23 ("the plan").
2. The Chamber is a not-for-profit membership-based service organisation that has been the home and voice of business in Waitaha Canterbury since 1859. Comprised of over 2,700 members, The Chamber's purpose is to create a thriving Canterbury business community by advocating, connecting, inspiring, and empowering people. This is done through providing advisory and consultancy support in employment relations, human resources, health and safety, international trade, migrant support, manufacturing, research and development grants, training and development, and events to inspire, inform and educate our members. In the Covid-19 environment, this has included providing support to all businesses in the South Island through our 0800 50 50 96 Covid-19 Business Helpline and our dedicated Covid-19 Response Team.
3. The Chamber provides a voice for the local business community and to advocate for policies that will help shape and enable a local and national business environment that promotes innovation, productivity and economic growth as critical success factors underpinning a thriving economy and community. We are committed to responsible business behaviour and proactively encourage our members to engage in best business practices in relation to positive social and environmental outcomes.
4. The contents of this submission are based on insights from issues raised by members of the Canterbury Employers' Chamber of Commerce and the wider business community, in addition to our observations as a result of our longstanding relationship with the Council.

Submission #45951

COMMENTARY

5. The Chamber acknowledges that the Council has attempted to present a plan that demonstrates a balanced approach, recognising that there are continued pressures on both our business community and residents of the city. Rampant inflation, combined with a barrage of legislation that has negative consequences for business, continual supply chain disruptions and a labour market that is unable to supply a workforce to fulfil requirements have all combined to create an environment that is exceedingly harmful to business. The Chamber is not convinced that there is enough recognition and understanding of the current climate in which we operate, and an understanding of the role that the Council has to contribute to the improvement of this.
6. Our longstanding position is that austerity measures are not necessary given the strong economic position that our region holds, however any spending – continued or new – must be supported by a clear rationale that it will positively contribute to our social and economic recovery as we emerge alongside much of the rest of the world in normalising the existence of COVID-19 in our communities, reopening the border, and restoring healthy economic conditions.
7. The draft plan contains no significant initiatives that focus squarely on economic development. Only 1% of council funding for 2022/23 is allocated towards economic development and this is just not good enough. As immigration resumes, Christchurch needs to be positioned as a location of choice for both domestic and international migrants, as a quality city to live, and as having an environment which is conducive to economic growth. Attracting and retaining our young people, business owners and operators, investors, and international events are all a critical part of our city's future, and this must be factored into our economic development strategy.
8. There is very little regard for the business community in the draft plan and a lack of recognition that local businesses are fundamental for economic growth. As we have expressed in every previous submission to the Council, we expect a commitment from the Council to enable a more supportive regulatory environment that facilitates rather than hinders business. Economic growth is fundamental to achieving strong community outcomes.

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9. The Council is largely perceived by the business community as a handbrake and installer of red tape. We would like to see this perception shift to a Council that is viewed by business as a facilitator and enabler, however this requires the Council to significantly improve its' method and level of communication and decision-making processes with the business community. It requires a demonstration of understanding the pressures facing business and a willingness to help address them. We are not convinced that there is a strong understanding across Council staff of the actual issues and pressures that businesses face not only from local government, but from central government also.
10. The Chamber is supportive of the significant investment in Three Waters infrastructure that is outlined in the draft plan. Drinking water, stormwater and wastewater systems are a critical function of local government that is often neglected in favour of vanity projects. It is important that this focus continues, especially as population growth is set to continue.
11. It is pleasing to see that the Council has continued its focus on considering more efficient ways of doing things. The Council has an obligation to ratepayers that they receive the best return on their rates and an assurance that their contributions are being wisely spent. We expect, before anything else, that the Council focuses on the provision of core services, sticking to that and doing it well before focusing elsewhere.
12. The Chamber supports the continued focus on climate change mitigation. It is important that we have the right infrastructure to become a more sustainable city, and we encourage the Council to continue educating and incentivising positive actions rather than penalising. To reiterate the previous point, we expect the Council to stick to the provision of core services in the first instance. It does not necessarily need to be the Council that is implementing or funding initiatives and going forward we would like to see further partnership with the private sector to address areas such as this.
13. While it is noted that the Council faces the same inflationary pressures as every other business, and that increases of rates are less than the rate of inflation, we are not supportive of the 4.86% rate increase for a typical household and the 4.97% increase for businesses. \$700 in additional rates for an average business may not seem like a significant amount on the surface however it is important to recognise that the cost of doing business is at unsustainable levels with compounding cost pressures coming from every direction. Small businesses can only absorb so much. There is no recognition of this in the draft plan.

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14. Further to the previous point, The Chamber is not advocating for no increase as the Council must continue invest in the future, however it is important that for any increase that is imposing additional costs on business, that there is a very clear rationale that articulates what increased level of service or increased benefit will be realised as a result – and that consideration is given to further reprioritisation and asset recycling as an alternative before rates increases are considered – this is one option only that Council has, as all others should be widely explored first.
15. The Chamber is pleased to see that the Council is engaging in asset recycling and would like to see this continue at a greater scale. The Council must take the opportunity to review ownership of assets and whether the rationale for owning each is still valid, particularly given the current importance of facilitating economic growth, and whether better outcomes can be achieved for the city.
16. The Chamber is strongly opposed to the Council's implementation of the new general rate differential for vacant central city land. It is not enabling for business, and we would rather see support for central city developers to be involved in decision making and provided with incentives to develop land rather than penalising them. This is not a rate and should not be described as one, it needs to be renamed as a fine. We are disappointed to see its inclusion after previously submitting against it.
17. The draft plan contains minor changes to performance standards. The Chamber is concerned to see the reduction of production and delivery of events reduce from 11 to 9 and considers both numbers to be woefully inadequate. We would have preferred to see this significantly increase. Events, such as the recent Women's Cricket World Cup are significantly important to our local businesses and our community. The Council must be doing more to support our events sector, particularly given the impact of COVID-19.

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CONCLUSION

The Canterbury Employers' Chamber of Commerce would like to see firm commitment from the Christchurch City Council that it recognises the acute pressures currently facing business, and a reflection of this in all aspects of the draft annual plan. We would also like to see a far greater effort in positioning Christchurch as an attractive and competitive city both domestically and internationally, in addition to the provision of significantly more major events.

The Canterbury Employers' Chamber of Commerce wishes to make an oral submission.

CONTACT

Leeann Watson
Canterbury Employers' Chamber of Commerce
Chief Executive



Have Your Say - Vacant Central City
Peter Scholes Phone: [REDACTED]

Yes I would like to speak to hearing

Item 3

Attachment 1

Q1 The differential should be 10 not the lower 4. Because the higher rate of 10 would be a real encouragement to do something.

Q2 The differential should not apply to vacant land that the owner has invested half the land value in landscaping

Appeals: Any councillor can refer any property to the Director of the Botanic Gardens for adjudication with no appeals.

Q3 This new rate on Vacant central city land should apply to all land within the Four Avenues. The central city is all the land within the Four Avenues

Q4 Yes Please The developer building owner have had long enough time to fix their building up. The differential should be the same as the Vacant land differential
New Rate for Vacant ground Floor windows.

In Peace and Love
PJS

Submission #45959