Christchurch City Council
ATTACHMENTS - UNDER SEPARATE COVER

Date: Tuesday 5 August 2025
Time: 9.15 am
Venue: HR Training Room, Level 1, Civic Offices, 53 Hereford Street, Christchurch
This meeting will be recorded and published online.

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Submissions received on Development contributions rebate schemes, June 2025

Organisations / Businesses

Contribution ID	Submitter feedback	Name - organisation/business
35965	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Yes **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** DAY LIGHT ROBBERY **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 30 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Somewhat **If any, what funding limit would you support for the scheme?** 1 million	Stockman Group Limited
35966	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Somewhat **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** i like that it will encourage units in the central city bUT its seriously flawed **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** 1) this must not be 100% rebate, that is totally unfair- i suggest a max of 50% rebate , that means the credit will last a lot longer (otherwise first in first served which is unfair), also 100% is unjust- if you are creating demand on infrastructure you should be paying something, at least 50% 2) if you were doing DC's fairly as per my submission (ie: only charging 80% of an HUE for 2 bedroom units) you shouldnt need this subsidy **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Somewhat **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** good grief- 6 storey developments are generally uneconomic due to the huge costs of 1) structure & foundations / geotech 2) fire design 3) acoustics (noise between units) 4) the council urban designers creating a misery so i guess anything that helps is a start but as you will see they dont get built often	A E Architects Ltd

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name - organisation/business
	What don't you like about the proposed six-story residential development in the central city rebate scheme, and why? see my previous response	
35967	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Yes **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** I like the fact that commerical buildings that are being returned to the same or similar use that fall outside the 10 year lapsing period, are able to utalise their existing credits and NOT have to pay Development Contributions again. This is good common sense from the City, given that fact that bring these buildings back on line (without adding to the infrastructure demand for the city), is in everyone's best interests, as we can remove â€˜eyesore' buildings and further enhance our great city. **If any, what funding limit would you support for this scheme?** 5 million (proposed) **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Yes **If any, what funding limit would you support for the scheme?** 2 million (proposed)	The Hereford Limited
35973	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Yes **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** It encourages more development in the city for the remaining undeveloped sites and it appears to be a commercially fair position to take. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** I don**'t** like that the proposal doesn**'t** consider extensions for development contributions outside the CBD. Council should extend all existing and expired Development Contributions credits outside the CBD for a further ten year period. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 30 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Don**'t** know / Not sure **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** No comment **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** No comment	Carbon Property

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name - organisation/business
	If any, what funding limit would you support for the scheme? None	
35989	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Yes **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** Beneficial not just to the building owner but the whole city then benefits **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** I think it should be extended beyond the current parameters so more sites are eligible **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 30 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Yes **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** Fantastic idea to encourage our inner city to thrive **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** I think it should extend to the immediate suburbs around the four aves about 4 blocks **If any, what funding limit would you support for the scheme?** 10 million	Jakari Investments Ltd
36315	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Yes **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** I like the fact the Council is wanting the city to recover , a credit /rebate on Development levies for existing buildings that have been waiting to be repaired or just finished repair is a positive thing to help the city recover . This is fair as the CCC have already had Development levy's on all the buildings in the CBD and it isn't putting any new demand on infrasture/reserves . so no development levy should be charged. Once the buildings are repaired ,or rebuilt the CCC will benefit by having a more vibrant city and charging more Rates . **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** I agree to the rebates ,existing credit for Levies. I dont like the fact the CCC are suggesting only having this open until June 2027 . as there is only so many buildings we can build or repair each year .	Marshall Group Holdings lImited

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name - organisation/business
	Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer: The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 30 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Yes **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** I agree that this is a good idea to encourage more higher residential in the city . more people in the city will help the business and create a better safer city . Again the CCC benefit by charging more rates . **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** I dont like the fact you are limiting it to developments by june 2027 **If any, what funding limit would you support for the scheme?** 10 million	
36668	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Somewhat **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** Recognition of existing demand credits is essential, however, not recognizing demand credits for vacant sites that had large buildings pre earthquake is flawed and likely illegal. DC can only be required if the development creates a demand for new or additional assets or increased capacity in existing assets. Given the vacant site was previously developed and infrastructure provided for that size development there is no reasonable claim that a new development of similar or lesser scale creates additional demand. The cost of repairing or maintaining existing infrastructure cannot legally be funded by development contributions. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** As above, the expiring of or not giving credit for existing Development Contributions cannot be legally supported. Given the massive increase of the level of DCs proposed for the central city, it is inevitable that the legality of the expiration of DCs will be challenged. The risk to CCC is that if the challenge is successful, which our legal advice indicates is likely, not only do the City not get the DCs charged but will be forced to repay all DCs charged in the CBD which did not credit for previous development on that site. The suggestion by CCC and indeed in this submission form that honouring existing DC credits is somehow a "fund" or a cost to CCC is fundamentally flawed as the CCC was and is not entitled to charge DCs unless a development creates additionally demand. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 30 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?**	Peebles Group Ltd

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name - organisation/business
	Somewhat **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** Very little. There are virtually near zero proposals for 6 level or more residential developments in the CBD or indeed anywhere in CHristchurch. This likely due to constructions costs to develop high rise residential, complicated planning, building consent, fire regulations and most importantly demand for these types of apartments. The DC rebate will likely not make these developments more desirable to purchasers. Suggest a rebate for 3 level residential development be adopted as this will encourage developers to increase from 2 to 3 levels which is more likely to have an effect. **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** Unlikely to have any impact at all on encouraging development. **If any, what funding limit would you support for the scheme?** 10 million	
36882	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** No **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** 1. Legal Concerns About Expiry of Credits The current CCC policy, which allows development contribution credits to expire after ten years for demolished or vacant buildings, conflicts with the Local Government Act 2002. Section 197AB(1)(a) specifies that development contributions should only be charged if a development creates or has created a need for new or expanded infrastructure. This means that where a redevelopment does not increase demand - particularly when replacing a previously serviced building of equal or smaller scale - no new DCs should be applied. Allowing credits to expire in these cases is both inequitable and unlawful. 2. Impact on Development Viability The proposed rise in CBD development contributions - from around $8,000 to $29,000 per unit - is an increase of over 300%. This substantial hike significantly undermines the affordability and feasibility of central city projects. When combined with the expiry of existing demand credits, it forces developers to pay full DCs for projects that do not place any new burden on infrastructure. This cost is passed on to purchasers or makes projects unviable. 3. Infrastructure Already Provided Sites with previously existing buildings were already serviced by CCC infrastructure. Redevelopments on these sites, especially where the new buildings are of similar or smaller scale, do not require new or upgraded infrastructure. Charging DCs in these cases effectively shifts the cost of maintaining existing infrastructure to developers, which contradicts the intent of DCs. The ongoing maintenance of existing infrastructure should be funded through rates. 4. Recommendations Preserve Existing Demand Credits Indefinitely: Development contribution credits should not expire arbitrarily after ten years. Doing so is inconsistent with the Local Government Act 2002. Demand established by a previously developed and serviced site should continue to be recognised, regardless of how much time has passed since a building was demolished or left vacant. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme is limited to buildings standing at 1 March 2024 **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Somewhat	Brooksfield

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name - organisation/business
37102	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Somewhat **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** We like the extension of the scheme to encourage development, in particular prominent sites such as 122 Barbadoes St (former Cathedral of the Blessed Sacrament) and land bordered by Colombo St, Armagh St, Manchester St, Oxford Terrace. Development on these sites replaces previous development therefore requires less demand on infrastructure and facilities. We obviously favour the option to extend this scheme to include vacant sites. Previous structures had to be removed post-earthquake due to safety. As noted in our submission made to full council Since 4 September 2010 our Diocese has faced what no private developer would have had to including: -3 Bishops. -Requirement to observe Canon and Common Law. Any project over a certain threshold of expenditure requires approval. Being a world-wide church -these approvals take some time. -Destruction and damage to Diocesan, Parish and School property right across Canterbury and the West Coast. -Under apostolic administration for 3 Â½ years. -All property matters put on hold due to the challenge to Rome for 10 months. COVID-19 impacts on Pastoral and business life for 2 Â½ years. We are not looking for a handout from Council, rather we wish to retain credits that were already available. We acknowledge the decision of Council to consider an alternative to the arbitary cessation of demands credits 10 years after at least 3 separate natural disasters. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** We do not like the capping of the scheme to $5million. As noted above we are not able to move as quickly as a standard property developer. We would also request the scheme maximum amount be increased to say $20m. We would like the ability to work with Council Officers through the matters to be resolved, after a decision is made. A 2-year timeframe is difficult for a non-profit operation which requires to raise a significant amount of money for it's development whilst still significant community facilities including â€¢ Parish life Integrated Catholic primary and secondary schools - Youth Outreach - Cultural communities - Hospital Chaplains - Prison Chaplains - Catholic Social Services - Tertiary chaplaincy **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 20 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Somewhat **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** Encouragement of City living is to be applauded.	The Roman Catholic Bishop of the Diocese of Christchurch (Corporation Sole) being Michael Andrew Gielen (The Bishop)

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name - organisation/business
	What don't you like about the proposed six-story residential development in the central city rebate scheme, and why? The requirement to have the entire property used for a purpose other than residential is very restrictive. If a covenant of this type was applied to say our Armagh St block titles, it would significantly reduce the market value. A block of that size requires a mix of uses including city residential, retail, entertainment and food/retail. Although there are various titles on the block, a harmonised design would require a spread of purposes across the land. **If any, what funding limit would you support for the scheme?** 5 million	
37116	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** No **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** The proposal that credits expire in 10 years on land where there may have been land use with more density (as the site has been demolished or removed) to what the proposed redevelopment would be. Credits for this existing land use should be maintained with no doubling up and no expiry. It is not considered equitable to charge for new development where additional demand is not created especially if what is proposed being lesser or equal to what was there previously. DCs should only be required to pay for new infrastructure not maintaining or contributing to existing in the way proposed. Do not support the quantum of the increase in DCs in the CBD. The degree of increase is extreme and will impact projects commercial viability. Seek no expiry to the credits for DCs on sites. **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** Six levels are too high for this to be used effectively as will apply to minimal developments. It should be applied to a lower level of building to incentivise and support development and that this should be two or three levels.	Mike Greer Homes
37367	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Somewhat **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** It: (i) is seeking to encourage development within the Four Avenues. The recent increase in DCs in the central city from $8,000 per unit to $29,000 per unit places significant pressure on the affordability/viability of central city developments; and (ii) recognises that a development may replace a previous development on the same site and "therefore not place additional demand on infrastructure and facilities". This recognition in the consultation paper seems to be an acceptance by the Council that replacing a development with another development (whether it is within 10 years of the earthquake or not) does not add additional demand on infrastructure and facilities. Therefore the replacement development does not require new or upgraded infrastructure to service the replacement development. Accordingly, we believe, charging development contributions in these circumstances is illegal and a breach of the Local Government Act. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** It is not necessary if the Council recognises the legal position that existing credits should not expire arbitrarily after 10 years. If the policy is implemented, it should not draw a distinction between between vacant sites and sites on which buildings were standing on or after 1 March 2024.	Carter Group Limited

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name - organisation/business
	The Council should take a more holistic economic view of development contributions in the central city. It is clear that the Council views development contributions as a source of revenue as it is noted in the consultation paper that "the cost of the scheme would be revenue foregone". This however, we believe, is the wrong way to look at the issue. Development contributions are not a revenue source and, as provided for in the Local Government Act, development contributions may only be required in relation to developments where that development means that the territorial authority is required to incur capital expenditure to provide for additional infrastructure. Sites that had buildings on them pre-earthquake that were already serviced by CCC infrastructure and replacement buildings do not add to the demand requirements. It is more correct to say that the cost of the Council's current approach to development contributions in the central city is the foregone, delayed or downsized developments and the lost recurring rates income that the Council would benefit from on developed sites. It is growing the rates base (and the central city), rather than seeking to use development contributions as a revenue source, that should be focus of the Council. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Somewhat **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** It encourages development within the Four Avenues. **What don’t you like about the proposed six-story residential development in the central city rebate scheme, and why?** The six storey or more requirement is unlikely to have meaningful impact. We believe a three storey threshold would be more appropriate. The points about the illegality of charging development contributions on sites where there was a development pre-earthquake applies to this scheme as well. **If any, what funding limit would you support for the scheme?** None	
37387	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** No **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** The intention behind Scheme 1 to recognize prior demand so redevelopment isn**’t** unfairly penalized is sound. The principle of reinstating or extending DC credits for sites that had buildings pre-earthquake acknowledges the legitimate expectation that landowners should not be charged again for infrastructure their properties previously utilized. This recognition that existing use rights and credits have value is a step in the right direction, as these properties already contributed to infrastructure that still exists and has capacity. **What don’t you like about the proposed existing demand credits in the central city rebate scheme, and why?** The scheme is fundamentally flawed due to its retrospective cut-off date (March 1, 2024), which arbitrarily penalizes landowners who cleared sites before that date for legitimate reasons like safety or aesthetics. The $5 million cap is grossly insufficient and will likely be exhausted by just 4-5 projects, creating an unfair "lottery" system. The 2027 expiry creates investment uncertainty. Most critically, this scheme is an admission that the underlying DC charges are prohibitively high but fails to address the root problem - it's merely a "band-aid" solution that doesn**’t** cure the legal non-compliance of charging DCs where no new infrastructure is needed, violating LGA s.199(2). **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?**	Williams Corporation

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name - organisation/business
	30 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** there are no positive aspects identified about Scheme 2. My submission is entirely critical of this scheme. **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** The covenant requirement forcing long-term residential use is ultra vires - it has no infrastructure nexus and improperly uses DC policy to achieve planning controls outside the LGA's scope. The arbitrary 6-storey threshold discriminates against "missing middle" developments (3-5 storeys) that first-home buyers need and can afford, creating a perverse "cliff edge" where a 5-storey building pays $600,000+ in DCs while a 6-storey pays nothing. With only $2 million funding (capped at $1m per development), the scheme will benefit at most 2-3 projects - nowhere near the scale needed to achieve Council's 20,000 resident target. The 2027 expiry creates planning uncertainty for developers. Most fundamentally, offering a 100% rebate is an implicit admission that the proper DC charge for central city development should be $0, yet the scheme withholds this unless arbitrary conditions are met. **If any, what funding limit would you support for the scheme?** 10 million	
37406	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** No **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** n/a **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** The proposed expiry of existing demand credits under the Central City Rebate Scheme is deeply flawed for several reasons, both legal and practical. Legally, it contradicts Section 197AB(1)(a) of the Local Government Act 2002, which states that development contributions should only be required if a development creates a need for new or additional infrastructure. Expiring credits after ten years-particularly for sites that previously housed buildings of equal or lesser scale-ignores this principle and risks being unlawful. From a development perspective, the recent tripling of development contributions in the central city, from around $8,000 to $29,000 per unit, significantly impacts project viability. Removing existing demand credits in this context unfairly penalises developers by charging them for infrastructure already in place and previously paid for. This is especially unjust when new developments simply replace former buildings that were fully serviced by council infrastructure. Development contributions are meant to fund growth-related infrastructure-not maintain existing networks-and this policy blurs that distinction. The expiry of demand credits not only undermines the financial feasibility of inner-city development but also violates the intent of the legislation. To support sustainable urban regeneration, existing demand credits should be retained indefinitely. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 30 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** n/a	Countrywide Properties Limited

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name - organisation/business
	What don't you like about the proposed six-story residential development in the central city rebate scheme, and why? The proposed focus on six-storey residential buildings in the central city rebate scheme is unlikely to deliver meaningful results. While the intention to incentivise development is commendable, this height threshold does not reflect the current development landscape in Christchurch. Projects of this scale are rarely pursued due to challenges that go far beyond development contributions, including complex planning rules, high construction costs, and market uncertainty. As a result, the rebate scheme risks being ineffective by targeting a type of development that is largely unviable at present. A more effective and realistic approach would be to lower the threshold to three storeys. This would better align with the kinds of developments that are both feasible and likely to proceed, thereby broadening the pool of eligible projects and making the scheme more responsive to actual market conditions. **If any, what funding limit would you support for the scheme?** 10 million	
37407	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Somewhat **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** We like the fact that the existing proposal would ensure that the rebate would apply only to the equivalent area of the building existing on or after 1 March 2024. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** 1. We have not been given evidence of demand for the scheme from developers. 2. The scheme as currently proposed does not require developers to pass on to purchasers any of the cost savings provided by the rebate. 3. We strongly disagree that decisions of allocation for the rebate should be made on the basis of first in first served. The fact that the proposal is for existing demand credits means that there will be a number of eligible applicants, and allocation should be equitable. Therefore, allocation should be extensively notified, and for a reasonable period before decisions are made, and decisions on allocation should be strictly by public ballot. 4. In the case of new builds exceeding their previous envelope, see our comments on 6-storey-plus buildings below. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme is limited to buildings standing at 1 March 2024 **If any, what funding limit would you support for this scheme?** 5 million (proposed) **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** In principle, we like the idea of covenants outlawing commercial use of residential facilities. If Council can demonstrate in connection with conditions on short-stay commercial use for already existing residential units in the Central City that it has the will and resources to monitor and enforce the rules, we might reconsider our opposition to this proposal. **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** 1. Multi-storey buildings (requiring provision for lifts, etc.) are expensive. There is no evidence, and no requirement under the proposal, that developers pass on to purchasers the cost savings of having contributions waived. 2. There is currently an evident lack of demand for high-rise residential buildings amongst prospective purchasers, whether because of perceptions around increased earthquake risk, or because of the continued influence of traditional housing preferences. 3. High-rise buildings do not demonstrably create a sense of community, or the "vibrancy" sought by Council. 4. On the basis of past and current experience, we do not have confidence in the ability of Council to police the rules excluding short-term commercial accommodation.	ICON-Inner City West Neighbourhood Association

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name - organisation/business
	If any, what funding limit would you support for the scheme? None	
37423	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Somewhat **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Somewhat **If any, what funding limit would you support for the scheme?** None	Property Council New Zealand
37429	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Yes **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** Please see attached submission. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** Please see attached submission. **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Don't know / Not sure	Cambridge 137 Limited
37657	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Yes **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Yes	Master Builders

Submissions received on Development contributions rebate schemes, June 2025

-Individuals

Contribution ID	Submitter feedback	Name
35963	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Yes **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** NA **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** NA **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 5 million (proposed) **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** NA **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** This will destroy the skyline - city areas feel impersonal, overwhelming pedestrians - Shadowing and loss of sunlight - Gentrification and loss of character - Emergency risk at Evacuation in emergencies (e.g., fires, earthquakes) is more difficult and risky in high-rise structures. **If any, what funding limit would you support for the scheme?** None	Alan Seah
35964	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** No **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** Nothing **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** I don't agree that ratepayers should be footing discounts for developers. I dont believe that multimillion dollar companies taking large real easte profits when buying an developing land should come at the expense of rates when the continual rise in rates is contested enough. I don't belive that handling out up to a million dollars to a private organization is beneficial to the city **If any, what funding limit would you support for this scheme?**	Lennon Cameron

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** I like that the Council is considering at least ways to get people back into a desolate CBD **What don’t you like about the proposed six-story residential development in the central city rebate scheme, and why?** I don’t agree that rates should reduce the cost on apartments for developers when thwy are going to be sold at profit anyway. Why should I as someone struggling with continual rate increase subsidize an industry where there's reported record breaking profits **If any, what funding limit would you support for the scheme?** None	
35970	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Somewhat **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** I Believe it's OK- BUT you are giving to many developers the right to just do townhouses up down - small cramped on sites- we have enough!! Get the developers to think outside the square - two bedroom 2 bathroom on one level great large balcony - you will attract money and sales worldwide if you as a council start to say enough **What don’t you like about the proposed existing demand credits in the central city rebate scheme, and why?** Not really- we truly have enough vacant retail space **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme is limited to buildings standing at 1 March 2024 **If any, what funding limit would you support for this scheme?** 5 million (proposed) **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Somewhat **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** I like the idea - but it must be controlled by the city council - it will be 1 bed small units - cheaper to build - creating no community - just a lot of vacant one bed units for rent Make sure as a council there is a maximum of one beds - lots of family one floor 2 bed 2 bath apartments that allow retirees to invest and downsize comfortably- including underground parking **What don’t you like about the proposed six-story residential development in the central city rebate scheme, and why?** As above **If any, what funding limit would you support for the scheme?** 2 million (proposed)	Sue Lyng
35972	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?**	Hans Smeets

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	No **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** Nothing developers are companies out to make money, and have enough means to do so. These private companies do not need cash from ratepayers, they make enough profit already **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** Developers don't need handouts, they are private entities **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** Nothing developers are companies out to make money, and have enough means to do so. These private companies do not need cash from ratepayers, they make enough profit already **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** Dangerous, would be to expensive to build earthquake proof, that is why developers are looking for cash. In Chc anything over 3 stories is irresponsible **If any, what funding limit would you support for the scheme?** None	
35974	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Yes **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** It should encourage dense development in the central city, and in lieu of a stick to remove unused lots (e.g. an additional LVT), a carrot is a good alternative. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 10 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Yes **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** It encourages actual apartment development in Christchurch, which there is very little of. A rebate on dense, in-the-city housing likely saves money over more subdevelopments and their associated infrastructure upkeep costs. **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** It may not be enough on its own. Coupling it with stronger zoning and permitting behaviour to discourage urban sprawl would be preferable. To ensure the units aren't excessively priced, a similar scheme could be investigated in other areas along the core transit corridor, such as Riccarton and possibly even Hornby.	Sam Spekreijse

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	If any, what funding limit would you support for the scheme? 3 million	
36013	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Somewhat **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** I supported the rebate scheme, with some reservations, when it was first implemented. Encouraging derelict buildings to be rebuilt seemed a positive move then and still is (provided the scheme is not extended again and the total value is reduced over time). **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** I'm not sure if it's actually encouraging redevelopment/rebuilds or not. I don**'t** have sufficient knowledge about how the scheme has worked, with what outcomes. I would not support anything that makes it easier for owners to just sit on an unused property, rather than get on and redevelop or sell. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme is limited to buildings standing at 1 March 2024 **If any, what funding limit would you support for this scheme?** 20 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** I do not support anything about this proposal. See below. **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** I do not support buildings this tall because of all the reasons covered in submissions made to Plan Change 14, in particular wind tunnels and loss of sunlight on neighbouring properties. There also is a enough evidence about the disadvantages of high-rise apartment buildings to make me uneasy about encouraging them here.. My primary reasons for not supporting this proposal, however, are (1) the initial stance of the CCC being that Christchurch should be exempt from the requirements of PC14c, citing data showing we have sufficient capacity to meet estimated housing needs, without going up very high or out very far. I cannot understand why we would now want to encourage buildings 6 storeys or taller; (2) given the concerns expressed by several Councillors and some submissions about the size of the proposed rate increase and/or arguing that no additional costs should be added to the Annual Plan at this point, it makes no sense to me that that we would actually propose a rebate scheme; and (3) tying any such proposal to the goal of 20,000 people living within the 4 Avenues seems unsound to me. There is no viable plan that I can see (or adequate resources to put many of the suggested strategies that have been suggested into place) that would support that many people living within this relatively small area. Having lived here for 30+ years, and knowing how that goal was created in the first place, I am confident that outcome would be negative and have the opposite effect of what proponents keep saying. **If any, what funding limit would you support for the scheme?** None	Marjorie Manthei
36183	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** No **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** I do not support the proposed existing demand credits in the central city rebate scheme. While encouraging development in the central city is important, offering subsidies or financial incentives to developers - many of whom already have significant resources - feels like a misallocation of ratepayer funds. These credits effectively reduce development contributions that should be used to fund essential infrastructure and services, and instead shift that cost burden back onto the public. Rather than subsidising private profit, I would prefer to see Council	Kyle Sutherland

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	focus its limited resources on addressing the housing crisis through investment in public and affordable housing. This would deliver long-term social benefits and help those most in need, rather than boosting margins for commercial developers. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** I have several concerns about the proposed sixstorey residential development under the central city rebate scheme: Firstly, there's a risk that height limits without proper oversight lead to poor-quality and poorly integrated housing stock. As highlighted in recent local discussions, larger developments may overlook important design quality-such as adequate soundproofing and community-friendly architecture-resulting in spaces that feel unwelcoming or isolating. Christchurch residents have stressed the importance of not just building taller but ensuring developments contribute positively to the urban fabric. Secondly, there's insufficient evidence that these rebates lower costs for homebuyers or renters. Councillor Jake McLellan noted there's 'no evidence' the rebates make inner-city housing more affordable, which raises the concern that rebates may simply inflate developer profits. Thirdly, parking, transport, and infrastructure strain are major concerns. Higher density means more residents-and more cars-yet new six-storey buildings often fail to account for off-street parking or adequate public transport options, leading to congestion and encroachment on footpaths and verges, as seen in other regions. Fourth, there's anxiety about earthquake resilience and building standards. Pushing taller developments demands robust building and consenting processes. Recent issues-like the eight storey office block at 230 High St with structural flaws-underscore the need for caution. Without rigorous standards, height can compromise safety, especially in a seismically active city. A final and fundamental concern is that any incentives or public funding should be directed toward building more public and genuinely affordable housing-not private developments that primarily serve profit-driven interests. Christchurch is facing a well-documented housing crisis, with many residents struggling to find secure, affordable accommodation. Rather than subsidising private developers, Council resources should be used to invest directly in public housing projects that offer long-term social and economic benefits. Supporting public housing ensures that ratepayer money delivers tangible outcomes for those most in need, reduces housing insecurity, and strengthens our communities, rather than boosting margins for private interests. For these reasons, I'm skeptical of incentivising six storey residential buildings without clear assurances around quality, affordability, infrastructure provision, and seismic resilience. **If any, what funding limit would you support for the scheme?** None	
36227	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Somewhat **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** What works about this scheme is that it targets a real bottleneck in Christchurch's central city rebuild: underutilised land where pre-quake buildings once stood but where developers now face full development contributions, even though the site had prior demand. By restoring those historical credits, the Council is acknowledging that many of these sites are not starting from scratch. They have already been connected to infrastructure and are not	James Cox

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	necessarily placing new pressure on services. That is a fair and practical approach, especially in a city still dealing with the long tail of earthquake recovery. It also encourages the redevelopment of prominent, often empty or decaying sites that affect how the central city is perceived by visitors, investors, and locals. Getting movement on those blocks will help restore confidence and improve the look and feel of the area. The scheme is time-limited and capped at five million dollars, which makes it financially manageable. Most importantly, this is not a subsidy. It is correcting a mismatch. If a new building is replacing something that was already there and already using council services, then expecting full contributions again makes no sense. This scheme fixes that. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** The main issue with this scheme is that it risks rewarding long-term land banking without strong guarantees of timely development. Sites that have sat idle for over a decade could now benefit from financial relief simply for still having a roof and four walls, even if the owner has made no effort to redevelop. That sends the wrong signal to developers who have already taken on risk and delivered projects without relying on rebates. Another concern is the lack of targeting or performance requirements. There is no clear link between receiving the rebate and delivering specific outcomes, such as high-quality design, mixed-use development, or timely project completion. Without any performance triggers or accountability, Council may end up giving away revenue without securing public benefit. There is also a fairness question for ratepayers. Funding this scheme through ratepayer-backed borrowing shifts the cost burden from private developers to the wider community. That may be acceptable in some cases, but only if it results in visible and measurable improvement to the central city. At present, the scheme lacks that accountability. Lastly, there is a risk of administrative inconsistency. Sites that are partially demolished or straddle multiple lots could lead to complex and subjective assessments. That creates uncertainty and opens the door to disputes over eligibility. In short, the idea of reinstating historical credits is sound in principle, but the scheme needs tighter conditions to prevent misuse and to ensure that public investment leads to meaningful outcomes. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 10 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Somewhat **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** What stands out about this scheme is its clear strategic purpose. It directly supports the Council's goal to increase the central city population to 20,000 by 2028, which is essential for creating a more vibrant, economically sustainable urban core. The focus on six-storey residential developments is also smart. It encourages serious, large-scale investment and efficient land use, rather than small infill that may not shift the dial. By concentrating the rebate on higher-density builds, the scheme promotes a compact, walkable city with better public transport viability and lower per-capita emissions. The requirement for a restrictive covenant to lock in permanent residential use adds credibility. It ensures the benefit is going to long-term housing, not short-term rentals or speculative hotel conversions. That aligns with the goal of building a genuine residential community, not just adding units on paper. Finally, the scheme is time-limited, capped at $2 million total and $1 million per development, which keeps it fiscally contained. It's a targeted tool to help close viability gaps on marginal but worthwhile projects, not an open-ended subsidy.	

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	What don't you like about the proposed six-story residential development in the central city rebate scheme, and why? The biggest concern with this scheme is that it offers a 100 percent rebate with no performance or quality requirements beyond the six-storey height and a covenant. That opens the door to ticking the minimum boxes just to access funding, without necessarily delivering high-quality, well-designed, or affordable housing. There is also no targeting based on location or strategic need within the Four Avenues. Some parts of the central city are already seeing active residential development, while others remain underutilised. A blanket approach risks subsidising projects that would have happened anyway, rather than unlocking difficult or high-priority sites. The covenant mechanism is a good start, but enforcement is unclear. If units are converted to short-term rentals later, will Council have the resources or legal footing to track and act on that? If not, the rebate could easily be undermined by loopholes or weak follow-through. Another issue is the lack of incentives for mixed-use or community-building features like ground-floor activation, green space, or accessibility. A tall residential block that isolates itself from the street doesn'**t** add much to city life, even if it boosts the population count. Lastly, while the total cost is capped, there's no requirement for delivery timeframes or staged accountability, which means developers could claim the rebate and sit on partially completed builds. That carries financial and reputational risks for Council. **If any, what funding limit would you support for the scheme?** 3 million	
36249	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Yes **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** The properties in place deserve to have credits applied and to especially assist in their post-quake rebuild. These buildings have already been paying for the services of the city that the development fees cover. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** Why is this limited to the Central City? Why does the City Council have development credits only for this area of Christchurch. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 30 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** I don't. **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** There are large company/entities already building inside the the CBD area and appear to have been built to maximise profit of the developer at the expense of the future of our city. Limited to no carparking areas. Balcony spaces removed and questionable asthetics to buildings. There is a question around what consideration has been given towards managing City traffic noise and especially with the development of the Stadium. We appear to be flooded in with inner city smaller dwellings, along with the 2bed townhouse developments throughout the city which have the strong potential to drive down value of existing homes.	Annette Pendergast

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	This should not be funded by the rate-payer as I don**'t** see these funds making a difference when encouraging inner city residential development, just profits by Developers. Also how much of these funds will go to the NZ developer. The building of over 20 units on a site will allow the investment through internationals who can get around the OIA. **If any, what funding limit would you support for the scheme?** None	
36351	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Yes **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** I like the rebate for expired existing demand credits in central city as I think it will help renovate and revive the CBD. It's way past time the eyesores were removed or renovated. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** Nothing to dislike for me. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 30 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** Nothing **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** It is to the developer's benefit to have as many stories, as many apartments, as possible/ allowed to a building. The more apartments, the higher the profit.That should be enough encouragement. I do not want my rates adding to that profit. **If any, what funding limit would you support for the scheme?** None	Jean Flannery
36391	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** No **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** I don't. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** So long after the earthquakes, we should be taking a more hard-line approach. Instead of not charging development contributions, you should charge undeveloped lot rates based on the maximum use case for each site. High rates for an under utilised site is more likely to induce owners to develop the site with something that has a demonstratably lower impact on infrastructure. As it currently stands, I would only expect the scheme to be limited to buildings standing at 1 March 2024, but if you were to follow my proposed options, then this should include all under developed sites. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:**	Samantha Quigley

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	The scheme is limited to buildings standing at 1 March 2024 **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Yes **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** This is much better, encouraging the development of sites more in line with the intentions of the recent district plan changes. **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** This should be limited to specific areas where residential development in the central city is to be encouraged, rather than all sites across the central city. **If any, what funding limit would you support for the scheme?** 10 million	
36507	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** No **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** Not much. At least the council is trying to give a carrot to the dirty thirty. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** I don't think it will change the plans of any developers. The consultation cost and minimal funding limit and short time period all come together to make this look like a waste of council time and resources. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** It is nice the council is trying to encourage larger apartment complexes. **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** I don't think this rebate is enough to encourage developers. It is a waste of council time a resources. **If any, what funding limit would you support for the scheme?** None	Katie Simpson
36672	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?**	Antony Gough

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	Yes **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** Existing Development levies should not expire. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** The Development Credits should not expire. They have been paid previously and so should have no time limits. **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Somewhat **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** Should apply to residential buildings over 2 stories and not 6 as proposed. **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** Should be for residential buildings over2 stories. **If any, what funding limit would you support for the scheme?** 2 million (proposed)	
36898	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Somewhat **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** I agree there needs to be encouragement for good development to occur in the city centre on sites that were affected by the 2011 earthquake. I agree that if these sites have already previously paid contribution via past development towards infrastructure they should not be made to pay this again providing the new development will not place a much greater demand on infrastructure than the previous development did. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** Where contribution has not previously been made towards infrastructure / additional funds are needed I do not believe the rate payer should foot this bill. Rate payers should not have to pay for projects that private developers will be profiting off. We should not reward developers for land banking. There has been a considerable amount of time since the earthquake and there is really no excuse for sites to have remained empty / in a derelict state for this long. Rather than providing a carrot I believe the council should provide a stick and fine developers for leaving their sites in these states. If they cannot afford to redevelop they should be forced to sell the sites to someone who can at this point. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No	Ingrid Anna Schwalm-McEwan

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	What do you like about the proposed six-story residential development in the central city rebate scheme, and why? I agree the city centre should support density and limit sprawl **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** I do not believe that rate payers should be footing the bill for development companies. If developers wish to construct a project they should pay for it, as they will ultimately reap the profits not the rate payer. If the city council wishes to encourage higher density development this should be done with zoning / regulation rather than getting rate payers to foot the bill for private companies to profit. **If any, what funding limit would you support for the scheme?** None	
36903	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** No **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** I don't think it's fair to charge rate payers for corporate wellfare. There is enough incentive for development with sale/lease profits. These developers have had 10 years to contribute to improving the central city and have chosen not to. Also what happened to no buildings over 5 stories? I like that christchurch isn**'t** full of ugly high rise buildings. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** It's just more support for the rich. I don**'t** see how a residential apartment block will benefit anyone but the people living in it, air bnb owners and developers. It's not fair to expect suburban christchurch rate payers to subsidise developers. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme is limited to buildings standing at 1 March 2024 **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** I suppose it's good to build new housing (but not this type ideally) **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** As above I like that Christchurch doesn**'t** have ugly high rises. And I don**'t** know anyone who wants to live in a shoebox with 100 other people. The central city is incredibly congested and you want to cram another 13,000 in there? **If any, what funding limit would you support for the scheme?** None	Anna Laurenson
36909	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** No	Alan Seah

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	What do you like about the proposed existing demand credits in the central city rebate scheme, and why? No **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme is limited to buildings standing at 1 March 2024 **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** No **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** Don't see the benefit where developers already earning. **If any, what funding limit would you support for the scheme?** None	
36911	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Yes **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** it encourages deve;opers to use the existing credits or lose them **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 5 million (proposed) **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** I dont like this scheme **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** Developers can use existing credits under the previous scheme but no more free credits please They are already rich enough and the ratepayers shouldnt be subsidizing them. You need to impose more stringent regulations on Air BNBs in the central City as well, this will free up dwellings for permanent residents. At present developers are advertising developments as Air BNB compliant what ever that means. How many air BNBs in the central city pay any fees to the council. They are competing with hotels and motels and have a huge advantage in that they are not bound by the same rules and regulations.	Jennifer Dalziel

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	If any, what funding limit would you support for the scheme? None	
37005	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Don't know / Not sure **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** Do not wish to answer **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** Do not wish to answer **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Yes **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** It makes sense to incentivise development in the central city - many of the horizontal assets (such as three-waters and power) are under-utilised. So, the "cost" to Council is greatly reduced vs. green/brownfields development, which oftentimes requires new asset investment and renewals - both of which are costly. There are also other intangible benefits to residents living in the central city, such as enhanced wellbeing and growing the commercial core and supporting services which will benefit residents city-wide. **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** I'm told that once construction goes above three stories that the costs associated with compliance escalate dramatically. So, it is unclear if developers will actually uptake this incentive. Given this, I'd suggest adding more money to the pool. There is also some risk of inadvertently subsidising developments that may have already been planned, i.e. the subsidy may not have been required in order for the development to proceed. This is simply forgoing revenue. Given this, I'd suggest a lower pool of money is more appropriately. This is a difficult balance. But, considering everything and given the slow to-date investment in residential housing in the central city, I would recommend a pool of either 3 or 5 million may be most appropriate. **If any, what funding limit would you support for the scheme?** 5 million	Cody Cooper
37019	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** No **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** I don't want my rates providing discounts for developers. If their projects are not economical enough without them, they shouldn't be doing it. Our rates are stupidly high enough, with plenty of other things raising them, we don't need to add this too. **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2**	Laura Bates

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	Overall, do you support the proposed six-story residential development in the central city rebate scheme? No **If any, what funding limit would you support for the scheme?** None	
37022	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** No **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** Nothing **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** Developments should be funded by developers rather than rates payers. There is a huge sentiment for rates decreases in Christchurch, rather than increases which have been steep over the last five years. Any rates increases for nice to haves, improvements, or developments need to stop. Happy to pay rates for roads, water, rubbish and parks. Please focus on those essentials to keep the city running and skip the rest. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme is limited to buildings standing at 1 March 2024 **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** Nothing **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** Let developers pay for their developments. **If any, what funding limit would you support for the scheme?** None	Ariel White
37025	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** No **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** It won't benefit the Christchurch residents - I just see outsiders getting cheaper rates and no benefit to individuals and families in Chch who will have their rates increased. **If any, what funding limit would you support for this scheme?** None **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No	Clare Daubney

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	What don’t you like about the proposed six-story residential development in the central city rebate scheme, and why? Make the city feel very different and hinder the beautiful view of the port hills. **If any, what funding limit would you support for the scheme?** None	
37355	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Somewhat **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** It seems reasonable to get the deralect eyesore building rebuilt **What don’t you like about the proposed existing demand credits in the central city rebate scheme, and why?** Don’t include residential buildings **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme is limited to buildings standing at 1 March 2024 **If any, what funding limit would you support for this scheme?** 10 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** No **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** Absolutely nothing, this is a joke. I find this proposed scheme to be absolutely insulting to the ratepayers of Christchurch. **What don’t you like about the proposed six-story residential development in the central city rebate scheme, and why?** I find this proposed scheme to be absolutely insulting to the ratepayers of Christchurch. How dare the CCC propose this given: 1. The people of Christchurch strongly oppose having high rise residential developments and CCC know this from all the feedback from Plan Change 14 2. The CCC also opposed the need for such development in their push back on NPS at UD, saying â€œone size doesn**’t** fit all’ and we have enough capacity for the next 30 plus years AND NOW YOU WANT TO USE OUR RATEPAYER MONEY TO INCENTIVISE THESE BUILDING? You can**’t** be serious?? (sorry about the caps but this is incredulous that you have the nerve to even think about this proposal after all we’ve been through on NPD -UD and then be dictated to by Minister Bishop) 3. The figure of 20,000 people residing in the 4 Avenues is a completely fictitious number, it was a catch phrase â€œ20,000 by 2020â€� invented by Mayor Garry Moore years ago. It was simply an aspirational idea. There is no science behind this number, and the CCC are not even measuring actual residents. As we all know all the little Willams Corp boxes being built are investment builds and used as AirBnBs at they are not homes that people want to live in. CCC are measuring the number of boxes built as a proxy for residents. They are in no way the same thing and this is on Council to get it right. You have already enabled all these terrible hen coup boxes/cages that people don**’t** actually live in and now you want to incentivise more rubbish development using our money?? Seriously?? Who will pay for the infrastructure for these buildingsâ€¦.oh ratepayers. Get a grip, no wonder we have so much debt, the Council’s economic modelling seem to be lacking at the very basic level, evidenced by this appalling proposal. 4. High rise buildings do not promote a sense of community so don**’t** fit with planning objectives, and it’s not what ratepayers want. It’s incredulous that you have the gall to even suggest this as a serious idea. 5. The idea of having Covenants in place is a joke. Who will enforce these Covenants? Covenants are put in place by the developer, they will have no interest or means to enforce, so putting in this requirement is as useful as a wet bus ticket. Get real. **If any, what funding limit would you support for the scheme?** None	Lucy Alborn

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
37424	**Feedback on rebate scheme 1** **Overall, do you support the proposed existing demand credits in the central city rebate scheme?** Yes **What do you like about the proposed existing demand credits in the central city rebate scheme, and why?** 1. RESTORES FAIRNESS FOR LANDOWNERS AND DEVELOPERS The scheme acknowledges that many sites previously accommodated buildings or activities that contributed to infrastructure demand and likely already paid Development Contributions (DCs). Reinstating demand credits recognises this historical contribution and prevents the double-charging of DCs, which is especially important where no additional infrastructure costs are incurred. 2. ADDRESSES ONGOING UNFAIRNESS FOR VACANT, RATE-PAYING SITES In my case - and for many other central city landowners - sites have remained vacant for extended periods and therefore have placed NO ACTUAL DEMAND ON INFRASTRUCTURE, yet have continued to incur full rates liability. Two of my sites, for example, have paid significant rates for years, with little or no Council services provided in return. This situation represents a clear imbalance and an ongoing financial burden for landowners who are already contributing to the city's revenue without receiving corresponding value or service. It defies both economic logic and basic fairness. The proposed rebate scheme, while modest, would go some way toward correcting this long-standing inequity by recognising the historic contributions already made - and continuing to be made - by landowners of underutilised sites. 3. UNLOCKS UNDERUTILISED INNER-CITY LAND Many central city sites have remained vacant or underdeveloped due to the high cost of development and previous infrastructure-related contributions already absorbed. By reinstating demand credits, this scheme removes a financial barrier to redevelopment, encouraging landowners to build on sites that have long sat idle. This supports Christchurch's intensification and land efficiency goals. 4. ENABLES MARGINAL PROJECTS TO PROCEED In the current economic climate, many central city developments are only marginally viable. By reducing or removing DC costs through this rebate, projects that were previously commercially unfeasible may now become viable. This could lead to more development activity without the need for additional Council spending on growth infrastructure. 5. DELIVERS LONG-TERM FINANCIAL GAINS FOR COUNCIL Every new development that proceeds under this scheme becomes a source of ongoing rates revenue for the Council - often at higher assessed values than before. Encouraging redevelopment within existing infrastructure networks is a cost-effective way to grow the city's rating base and fund services long-term. 6. SUPPORTS STRATEGIC PLANNING GOALS The proposal is well-aligned with Council's own plans, such as the: â€¢ Central City Action Plan â€¢ Project 8011 â€¢ Christchurch District Plan All of these initiatives aim to increase population density and vibrancy in the central city, and this rebate scheme directly helps deliver those outcomes by incentivising private sector development in priority areas. 7. PROMOTES SUSTAINABILITY AND EMISSIONS REDUCTION By encouraging redevelopment in the central city, the scheme supports more compact, walkable neighbourhoods and reduces reliance on cars - which is consistent with the Council's emissions reduction and transport sustainability goals. 8. BUILDS TRUST AND GOODWILL WITH THE DEVELOPMENT SECTOR This scheme sends a positive message to landowners and developers: that Council is prepared to act pragmatically and fairly, especially in recognising past contributions and the realities of delayed development. It helps restore confidence that the Council is a partner in growth, not a barrier to it. 9. CONTRIBUTES TO HOUSING AFFORDABILITY By reducing the upfront costs of development, the rebate scheme has the potential to lower the final cost of delivering housing, particularly in the central city where construction and	Tosh Prodanov

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	compliance costs are already high. These cost savings can help reduce pressure on sale prices and rental levels, making inner city living more accessible for a wider range of residents - including key workers, young professionals, and downsizing households. 10. ALIGNS WITH NATIONAL POLICY OBJECTIVES Importantly, the scheme also aligns with the New Zealand Government's national direction on housing, including the National Policy Statement on Urban Development (NPS-UD), which requires local councils to enable greater housing supply and intensification in well-serviced areas. By encouraging residential redevelopment in the central city, the Council is helping meet both its own growth goals and those set out in national legislation to support more affordable, diverse, and sustainable housing options. 11. IT SUPPORTS HIGHER-DENSITY LIVING IN THE CENTRAL CITY AND ENCOURAGES EFFICIENT LAND USE The rebate scheme promotes more intensive and efficient use of land in the central city, which is already well-serviced by infrastructure and public amenities. Previous development contribution rebate schemes have proven effective in stimulating higher-density residential projects, helping to activate underutilised land and bring more people into the city centre. The result has been increased vibrancy, economic activity, and improved perceptions of the central city as a place to live and invest. Continuing this approach builds on a successful track record and supports further revitalisation. **What don't you like about the proposed existing demand credits in the central city rebate scheme, and why?** While I strongly support the intent behind this scheme, several aspects of its design risk undermining its fairness, accessibility, and overall effectiveness. My main concerns are as follows: 1. OVERLY RESTRICTIVE ELIGIBILITY CRITERIA The requirement that a structure must have existed on the site as of 1 March 2024 is unnecessarily narrow and excludes vacant sites that once had long-standing buildings or activities which previously generated infrastructure demand. Many sites were cleared with genuine intent to redevelop but were delayed due to market conditions, regulatory uncertainty, or external events such as the COVID-19 pandemic. This arbitrary cutoff unfairly penalises responsible landowners and fails to recognise Christchurch's development challenges over the past decade. 2. LOSS OF CREDIT FOR CLEARED SITES DISCOURAGES PREPARATION The scheme penalises landowners who proactively cleared derelict or unsafe buildings, often in the interest of public safety or future planning. To now deny those sites a rebate - simply because the structure was removed before the Council's chosen date - creates a perverse incentive to leave buildings standing unused, even if they are no longer fit for purpose. 3. UNJUSTIFIABLE FUNDING AND PER-DEVELOPMENT CAPS Capping the total available funding at $5 million and limiting each development to a maximum of $1 million in credits is both arbitrary and counterproductive. These limits may exclude high-impact developments or penalise those who apply later in the process. It also introduces a race for access to rebates that will discourage strategic, longer-term planning and create winners and losers based on timing rather than merit. 4. COMPLEXITY AND UNCERTAINTY AROUND CREDIT CALCULATIONS The requirement to base credit assessments on the highest level of actual or verifiable demand between 3 September 2010 and 3 September 2020 may sound objective, but it introduces complexity and potential inequity. Many landowners may lack the documentation or records to substantiate usage levels from that period - especially following earthquake-related disruptions. This could lead to inconsistent outcomes and unnecessary disputes between applicants and Council. 5. EXTINGUISHMENT OF ALL PRIOR DEMAND CREDITS The scheme's requirement that all previous demand credits be extinguished once a rebate is granted is unnecessarily harsh. In some cases, portions of the site may not be fully redeveloped immediately, or future development may alter demand again. To eliminate all historical credits, even those unrelated to the current consent, reduces flexibility and introduces future cost uncertainty that may deter investment. 6. BUREAUCRATIC BURDENS MAY DETER PARTICIPATION The process appears administratively intensive and lacks clarity around timeframes, appeal rights, or consistent treatment. This could particularly discourage small-to-medium landowners or developers who do not have the resources to navigate a complex rebate application process with uncertain outcomes. 7. INSUFFICIENT DURATION LIMITS SCHEME EFFECTIVENESS The scheme is due to expire on 30 June 2027 or earlier if funding is exhausted. This timeframe is too short given the often lengthy lead times associated with planning, consenting, financing, and delivering central city developments. Large-scale or staged projects - including those involving multiple titles or complex design requirements - may take years to progress. A longer	

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	duration or rolling eligibility window would better support the types of developments the Council aims to attract. This would avoid unnecessary pressure on developers to rush decisions, and allow developments that better suit both Christchurch as a liveable city, and Council's own stated goals regarding quality development. In summary, while the principle of recognising expired credits is sound and commendable, the scheme's rigidity, administrative complexity, and arbitrary exclusions risk limiting its effectiveness and fairness. A more inclusive, transparent, and flexible design would be better suited to achieving Council's stated objectives of encouraging redevelopment, promoting inner city vitality, and supporting long-term growth. **Scheme 1 is currently limited to buildings standing on or after 1 March 2024. Would you prefer:** The scheme be extended to include vacant sites (so that all central city sites would be included) **If any, what funding limit would you support for this scheme?** 30 million **Feedback on rebate scheme 2** **Overall, do you support the proposed six-story residential development in the central city rebate scheme?** Yes **What do you like about the proposed six-story residential development in the central city rebate scheme, and why?** I strongly support the proposed rebate scheme for six-story residential developments in the central city for the following reasons: 1. SUPPORTS DENSITY IN THE RIGHT PLACES The rebate encourages high-density development in the central city - precisely where growth should be happening. Building up, rather than out, aligns with the Council's objectives for compact urban form, sustainable transport, and reduced infrastructure sprawl. It also helps to meet the increasing demand for central housing in a way that maximises existing services. 2. ENABLES PROJECTS THAT MIGHT OTHERWISE STALL Without support like this rebate, many higher-density projects in the central city may simply not proceed. Construction costs, inflation, and financing challenges have made these developments more difficult. The rebate can help tip the balance, making marginal but worthwhile projects financially feasible. 3. CREATES A MORE VIBRANT, LIVABLE CENTRAL CITY More people living in the heart of Christchurch supports a thriving central economy, brings life to streets, and improves safety through passive surveillance. It also creates demand for local retail, hospitality, and services - helping to revitalise and re-anchor the central city as a 24/7 destination, not just a 9at5 commercial zone. 4. BUILDS ON THE SUCCESS OF PAST INITIATIVES Previous Development Contribution rebate schemes were proven to be effective at encouraging residential development within the Four Avenues. This proposal builds on that success, applying it to a higher-density threshold that is aligned with current planning priorities and climate goals. 5. DELIVERS LONG-TERM VALUE TO COUNCIL The one-off cost of the rebate is far outweighed by the ongoing rates revenue that high-value central city residential developments will generate. This makes financial sense for Council and taxpayers alike - supporting intensification where infrastructure is already in place. 6. SIGNALS THAT COUNCIL IS A PARTNER IN GROWTH The rebate shows that Christchurch City Council is prepared to take proactive steps to enable the kind of development it wants to see. It sends a message to developers and investors that the Council is committed to the central city and understands the practical barriers to delivering housing at scale. 7. CONTRIBUTES TO HOUSING AFFORDABILITY By reducing the upfront costs of development, the rebate scheme has the potential to lower the final cost of delivering housing, particularly in the central city where construction and compliance costs are already high. These cost savings can help reduce pressure on sale prices and rental levels, making inner city living more accessible for a wider range of residents - including key workers, young professionals, and downsizing households.	

Submissions received on Development contributions rebate schemes, June 2025

Contribution ID	Submitter feedback	Name
	8. ALIGNS WITH NATIONAL POLICY OBJECTIVES Importantly, the scheme also aligns with the New Zealand Government's national direction on housing, including the National Policy Statement on Urban Development (NPS-UD), which requires local councils to enable greater housing supply and intensification in well-serviced areas. By encouraging residential redevelopment in the central city, the Council is helping meet both its own growth goals and those set out in national legislation to support more affordable, diverse, and sustainable housing options. 9. IT SUPPORTS HIGHER-DENSITY LIVING IN THE CENTRAL CITY AND ENCOURAGES EFFICIENT LAND USE The rebate scheme promotes more intensive and efficient use of land in the central city, which is already well-serviced by infrastructure and public amenities. Previous development contribution rebate schemes have proven effective in stimulating higher-density residential projects, helping to activate underutilised land and bring more people into the city centre. The result has been increased vibrancy, economic activity, and improved perceptions of the central city as a place to live and invest. Continuing this approach builds on a successful track record and supports further revitalisation. **What don't you like about the proposed six-story residential development in the central city rebate scheme, and why?** While I support the overall intent of the scheme, several aspects of its design are overly restrictive and could undermine its effectiveness in achieving the Council's stated goals. Specifically: 1. UNREASONABLY STRICT HEIGHT THRESHOLD Limiting eligibility to developments of at least six storeys excludes many well-designed, higher-density residential projects that may be only four or five storeys tall due to site constraints, heritage considerations, or planning controls. This threshold is unnecessarily rigid and fails to support a broader range of central city intensification opportunities - especially those that could deliver high-quality medium-density housing. 2. ONEROUS COVENANT REQUIREMENTS The requirement to register a restrictive covenant on the title is a significant and often unnecessary administrative and legal burden for developers and landowners. These covenants can: â€¢ Create uncertainty around future use flexibility â€¢ Deter lenders or future purchasers â€¢ Add legal costs and delays to already complex projects Such an approach feels overly controlling and lacks trust in the very developers the scheme is intended to support. It could discourage uptake and lead to unintended chilling effects on otherwise desirable projects. 3. FUNDING CAP LIMITS POTENTIAL The total scheme funding cap (currently $2 million) and the $1 million cap per development are arbitrary constraints that may limit the impact of the policy. Once the fund is exhausted, later-stage or larger developments - which could deliver substantial benefits to the central city - may miss out. This creates an environment of uncertainty and inequity, where the first few applicants benefit and others are left behind despite aligning with Council's strategic objectives. 4. EXCLUDES MIXED-USE AND TRANSITIONAL HOUSING OPTIONS The scheme excludes residential units used for short-term guest accommodation or any other business activity, even if these uses contribute to vibrancy and economic vitality. While permanent residential housing is a priority, the blanket exclusion of other flexible or transitional uses seems short-sighted and fails to reflect the diverse ways in which the central city is used and experienced. 5. MISSES OPPORTUNITY TO ENCOURAGE SMALL-SCALE INFILL Focusing solely on large-scale, six-storey or higher projects may unintentionally neglect the important role of smaller developers and infill housing providers, who are often key to incremental revitalisation of the central city. A more flexible, tiered approach would be more inclusive and better reflect the varied nature of urban intensification. In summary, while I fully support the scheme's objectives, I believe its rigid criteria and legal requirements reduce its accessibility and risk limiting its effectiveness. A more flexible, inclusive, and administratively simple approach would deliver better results for both Council and the community. **If any, what funding limit would you support for the scheme?** 10 million	

Submission #37429

SUBMISSION ON CHRISTCHURCH CITY COUNCIL PROPOSED REBATE SCHEME FOR DEVELOPMENT CONTRIBUTIONS

Summary

1. Cambridge 137 Limited (**Cambridge 137**) supports the introduction of the proposed rebate scheme for development contributions in relation to existing demand credits (**rebate scheme**) for sites in the Centre City.

2. Cambridge 137 recently submitted on the Christchurch City Council's Draft Development Contributions Policy 2025. As part of that submission, Cambridge 137 supported either extending the term for the existing demand credits or providing an exception to the 10-year limit for buildings which were affected by, and have not been developed since, the Canterbury Earthquake Sequence (**CES**). The basis of this submission is that it encourages and provides incentive for growth and redevelopment of sites which have been vacant since the CES. The redevelopment of these sites is in the wider public interest to promote the ongoing re-development and regeneration of Christchurch.

3. Cambridge 137 supports the intention of the rebate scheme as it is a mechanism which encourages and incentivises the redevelopment of sites which have sat vacant or underdeveloped since the CES. In particular, Cambridge 137 supports the rebate scheme applying to all developments where the resource consent application was lodged with the Council on or after 1 March 2024.

4. Cambridge 137 considers there is one change which should be made to the rebate scheme to ensure it achieves its expected impacts. Specifically, Cambridge 137 consider the Council should increase the duration of the rebate scheme so it does not expire until 30 June 2028. This change would recognise complex commercial builds which often involve complex demolition and groundworks and therefore take longer to reach the stage of the first building inspection. This change would not alter the cost of the rebate scheme to the Council.

Background

5. Cambridge 137 owns the Harley Chambers building situated at 137 Cambridge Terrace (**Harley Chambers**). Cambridge 137 is owned by Citadel Property Limited which also has interests in a number of other commercial buildings and sites within Christchurch.

6. Cambridge 137 recently obtained a resource consent to redevelop Harley Chambers into a 200-room hotel which will provide much needed 4 star plus accommodation in the centre city on a landmark site.

7. Many properties effected by the CES have been the subject of significant insurance issues or litigation which have taken many years to resolve, are subject to heritage listings or alternatively have simply not been financially feasible to develop. This has effectively prevented developers from benefitting from the existing credit discount despite the effected buildings having a significant negative impact on the overall development and regeneration of the city.

8. Specifically in the case of Harley Chambers, the building has been identified by the Council as one of the 'Dirty 30' sites which impede the regeneration of the city. Harley Chambers is undeniably an eyesore to the city. It is in the public interest to have this landmark site redeveloped. Redevelopment will enhance the city and contribute to overall economic growth.

Public interest in regeneration

9. Buildings in the central city effected by the CES are often unattractive investments for developers due to being highly technical and expensive to restore or requiring complex demolition and rebuilding. Despite this, there is significant public interest in having the sites with these buildings redeveloped as they negatively impact Christchurch, both economically and aesthetically.

Submission #37429

10. Cambridge 137 considers that it is important for the wider visual and economic development and regeneration of Christchurch that the barriers to the redevelopment of these buildings (many of which are considered "barrier sites") are addressed. It is in the wider public interest there is support and incentives to develop these sites, particularly in the central city. The rebate scheme encourages and incentivises the redevelopment of these sites in the centre city and therefore Cambridge 137 supports the intent of the scheme.

11. The rebate scheme applies to all developments in the centre city where the resource consent application was lodged with the Council on or after 1 March 2024. This means the rebate scheme will apply to Harley Cambers, even where development contributions have been assessed under the existing Development Contribution Policy. As set out above, Harley Chambers is one of the 'Dirty 30' sites which impede the regeneration of the city, and it is in the public interest to have this landmark site redeveloped. Cambridge 137 supports the rebate scheme applying to Harley Chambers and other buildings which have already (recently) obtained resource consent as it as supports and incentivises the redevelopment of these sites.

Timing of application

12. The rebate scheme requires the person undertaking the development to apply for a rebate once the first building inspection is passed, however, the rebate scheme expires on 30 June 2027. Given the scale of the developments this rebate will apply to, the proposed time frame is limited.

13. Buildings which will be eligible for a rebate are likely to be large commercial buildings. These buildings take time to secure investment and develop, even once they have a resource consent granted.

14. The first building inspection for many of these commercial buildings is likely to be the pre-pour inspection of the foundations and any under slab services. To get to this stage, it can take a significant period of time, even once a resource consent has been granted.

15. Understandably, the Council will want to use the rebate scheme to encourage and incentivise swift development and regeneration of Christchurch, however, this should be balanced with the reality of large commercial builds.

16. Cambridge 137 considers the timeframe for a development to reach the first building inspection should be extended by 12 months. This will not impact the financial viability of the rebate scheme as there is a $5 million cap in place and it is proposed as a "first come, first served" scheme. Therefore, increasing the period to reach the first building inspection will not result in any greater costs for the Council. It will, however, retain pressure on developers to develop sites swiftly while allowing them the necessary time to secure funding and undertake demolition and ground works, which are often complex in large builds.

Presentation

17. Cambridge 137 wishes to make a verbal submission in support of this written submission.

Michael Doig and Jonathan Lyttle
Directors Cambridge 137 Limited

14 July 2025

Submitter: Cambridge 137 Limited

Address for service: Wynn Williams
47 Hereford Street
Christchurch

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Property Council New Zealand

Submission #37423

Property Council New Zealand

Submission on

Christchurch City Council's Development contributions rebate schemes consultation

14 July 2025

For more information and further queries, please contact
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Property Council New Zealand

Submission #37423

Christchurch City Council's Development contributions rebate schemes consultation

1. Summary

1.1 Property Council New Zealand South Island Region Branch ("Property Council") welcomes the opportunity to provide feedback on Christchurch City Council's ("the Council") Development contributions rebate schemes consultation.

1.2 Property Council supports development contribution rebate schemes. Development rebates can provide incentives to stimulate economic development. However, rebate schemes should be appropriately tailored by individual councils in conjunction with the local development community to better align council expectations with local developer knowledge and likelihood of uptake. We have recommended some changes to the proposed schemes to better ensure uptake from the development community in Christchurch.

2. Recommendations

2.1 At a high level, we recommend that Christchurch City Council:

- Extend Scheme 1 to include vacant sites;
- Does not limit funding for Scheme 1;
- Extend the expiry date to a five-year period for Scheme 1;
- Amend Scheme 2 to allow for three or more storey residential buildings to be eligible;
- Does not limit funding for Scheme 2;
- Extend the expiry date to a five-year period for Scheme 2; and
- Engage in good faith with individuals managing the expiration of development contribution credits to facilitate a more appropriate solution.

3. Introduction

3.1. Property Council is the leading not-for-profit advocate for New Zealand's most significant industry, property. Our organisational purpose is, "Together, shaping cities where communities thrive".

3.2. The property sector shapes New Zealand's social, economic and environmental fabric. Property Council advocates for the creation and retention of a well-designed, functional and sustainable built environment, in order to contribute to the overall prosperity and well-being of New Zealand.

3.3. Property is the largest industry in Canterbury. There are around $245.5 billion in property assets across Canterbury, with property providing a direct contribution to GDP of $4.5 billion and employment for 34,860 Canterbury residents.

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Submission #37423

3.4. We connect property professionals and represent the interests of 149 Canterbury based member companies across the private, public and charitable sectors.

3.5. This document provides Property Council's feedback on Christchurch City Council's Development contributions rebate schemes consultation. Comments and recommendations are provided on issues relevant to Property Council's members.

4. General

4.1. In the aftermath of the 2010 and 2011 earthquakes, Christchurch has been on a long road to recovery. Rebate schemes serve as a vital tool for incentivising development in areas where growth is essential for the city's recovery and long-term prosperity.

5. Scheme 1: Existing demand credits in the central city rebate scheme

5.1. The proposed scheme is for any development within the Four Avenues of the central city where the existing structure was in place on the lot on or after 1 March 2024. Property Council members are supportive of this proposed application area.

Extension to vacant sites

5.2. Members are also supportive of this scheme including vacant sites. Vacant sites within the central city are equally important to the urban regeneration process as properties with existing buildings. By supporting development on vacant sites, we can ensure that applicable land within the Four Avenues has the potential to contribute to Christchurch's vibrancy.

Funding limit

5.3. The scheme proposes a funding limit of $5 million, with a maximum of $1 million for a single development. The proposed scheme will either expire on 30 June 2027 or when the total scheme funding is fully allocated. Introducing funding limits create uncertainty in the market around eligibility. Furthermore, development is a long-term game and is not rushed into. Having an expiry date of 2027 will realistically only benefit existing development projects in the pipeline. If the goal is to encourage redevelopment in the central city, then we recommend there be no limit on the amount of funding and the expiry date is extended to a five-year period or beyond.

5.4. Additionally, the policy overlooks the economic benefit of the ongoing rates income that developed sites will generate for the Council in the future. The revenue from these sites would be a significant and continuous source of income, which should be factored into the funding considerations.

6. Scheme 2: Six-story residential development in the central city rebate scheme

6.1. The proposed scheme is for any residential development within the Four Avenues of the central city. The residential development, or residential component, must comprise of at least six storeys. Property Council members are supportive of this proposed application area.

6.2. Property Council members consider the minimum requirement of six storeys is not representative of the current central city landscape. Given the limited demand for buildings of that height, and feasibility concerns, our members recommend a minimum of three storeys instead. This will better encourage a range of housing heights and typologies.

Funding limit

6.3. A funding limit create uncertainty around eligibility. As per our previous comments, we do not recommend imposing a cap on the amount of funding available. We also recommend that the expiry date of this scheme is extended to a five-year period or beyond.

7. Expiry of development contribution credits

7.1. While we broadly support the proposed initiatives, our members have expressed concern about the expiry of development contribution credits. We recommend the Council engage in good faith with individuals managing the expiration of development contribution credits to facilitate a more appropriate solution. We will leave this for our members who are impacted to make individual comments on the expiry of development contribution credits.

8. Conclusion

8.1. Property Council supports the extension of Scheme 1 to include vacant sites, as this will help unlock underutilised land within the Four Avenues. However, to increase uptake among developers, Scheme 2 should lower the minimum height requirement to three storeys. This adjustment would better align with the current development landscape and market realities in central Christchurch.

8.2. Property Council members invest, own, and develop property in Christchurch. We wish to thank Christchurch City Council for the opportunity to submit on Christchurch City Council's Development contributions rebate schemes consultation as this gives our members a chance to have their say in the future of our city. **We also wish to be heard in support of our submission.**

8.3. Any further enquires do not hesitate to contact Sandamali Ambepitiya, Advocacy Advisor, via email: [redacted]

Yours sincerely,

Leonie Freeman
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Submission #37387

Re: Opposition to the Draft Central City Development Contribution Rebate Schemes 2025 and the Underlying Development Contributions Policy 2025
Submitted By: Blair Chappell, Managing Director on behalf of Williams Corporation Limited
Date: 13 July 2025

As Managing Director of Williams Corporation, I represent a company that has been integral to Christchurch's post-earthquake recovery. We have delivered approximately 850 townhouses and apartments in Christchurch's Central City (with approximately another 800 plus outside the four avenues in Christchurch), creating communities that embody the Council's vision for sustainable urban living. Our developments have:

- Provided affordable housing options for hundreds of first home buyers
- Created vibrant mixed-use precincts that reduce car dependency
- Generated substantial rates revenue (over $2.5 million annually) while utilising existing infrastructure efficiently

I have direct, substantial interest in lawful DC settings that enable, rather than deter, regeneration. My submission is grounded in practical experience and aligns with the Council's LTP objectives for a thriving Central City (targeting 20,000 residents by 2028). I wish to be heard in person to elaborate on these legal and economic arguments.

1. Executive Summary

The proposed rebate schemes are essentially an admission that the underlying development contribution (DC) charges are prohibitively high, requiring ad-hoc fixes. The rebates total only $7 million and expire in 2027—a "band-aid" solution that does not address the root issue of DC charges increasing by 264% (from $8,127 to $29,563 per unit).

The fundamental problem is this: Christchurch's Central City has massive surplus infrastructure capacity from the $2.2 billion SCIRT rebuild, yet Council proposes to charge developments as if new infrastructure is needed. Our 850 central city units required zero new infrastructure investment. The Council itself deferred $17 million of CBD projects due to low demand. Charging DCs without demonstrable infrastructure need violates LGA s.199(2) and transforms contributions into an unlawful tax.

Legally, the schemes contain multiple fatal flaws:

- Scheme 2's covenant requirement is ultra vires—forcing long-term residential use restrictions has no infrastructure nexus and improperly uses DC policy to achieve planning controls
- The arbitrary 6-storey threshold excludes the "missing middle" developments that first-home buyers need
- Retrospective eligibility criteria in Scheme 1 breach principles against retrospective policy-making

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- The consultation process itself is flawed—rebates cannot be fairly considered without reconsidering the base DC policy

Economically, this approach guarantees failure:

- Adds ~$40,000 to apartment prices, breaking First Home Grant caps
- Increases rents by $75-100 per week, pricing out essential workers
- Pushes development to greenfields, adding 4.5 tonnes CO_2 per household annually
- Creates a "death spiral"—high charges deter development, slowing growth, justifying even higher charges

The impacts are quantifiable: 1,000 households pushed to suburbs means Circa chappell4,500 tonnes additional CO_2 annually and 2,000+ extra peak-hour car trips.

Our primary recommendation is simple: Designate the Central City as a zero/minimal DC zone until infrastructure capacity is utilized. This is legally sound (no demand = no charge), strategically aligned with all Council objectives, and proven successful elsewhere (Hamilton's 66% CBD remission).

If Council proceeds with the current policy, it faces:

- Judicial review proceedings we are prepared to initiate
- Potential personal liability for Councillors under LGA s.44-46
- Certain failure to meet the 20,000 resident target
- Direct contradiction of Climate Emergency commitments

The choice is clear: Council can persist with an unlawful, destructive policy that enriches lawyers and impoverishes the city, or it can embrace solutions that unlock Christchurch's urban potential. Williams Corporation stands ready to work collaboratively on lawful alternatives, but we will not stand by while flawed policy strangles the development our city desperately needs.

This submission demonstrates why the current approach fails legally, economically, and environmentally—and provides a clear path forward that aligns infrastructure funding with Christchurch's strategic vision.

2. Inseparability Doctrine

This submission contends that the current rebate consultation (open until 14 July 2025) cannot be properly considered in isolation from the base Development Contributions Policy (consulted Feb–Mar 2025). The two are inextricably linked: the rebate schemes explicitly derive their necessity and content from flaws in the base DC policy (e.g. lapsed credits, prohibitive central city charges). It is a fundamental principle of natural justice and fair consultation that interdependent matters be considered together. By limiting the consultation scope strictly to the rebates now – after the base DC Policy was already consulted on separately – the Council risks a procedural impropriety. Affected parties cannot fully assess the rebates without revisiting the underlying DC charges they are meant to offset. Indeed, the Local Government Act 2002 (LGA) consultation provisions (sections 76–82) require that councils provide *"full and fair consideration of all reasonably practicable options"* and *"encourage those affected to present their views"* on proposals. That obligation is not met if critical context (the DC policy itself) is deemed out-of-scope. In practical terms, the rebate schemes and the DC Policy operate as one package – a change to how central city developments are charged. Thus, consultation should encompass both the base charges and the rebates together, or else it is incomplete and potentially unlawful under LGA sections 76–82.

2.1 Legal Basis for Integrated Consultation

Sections 76–82 of the LGA 2002 set out principles and requirements for council decision-making and consultation. Notably, s.76(3) and s.78 require councils to consider the significance of proposals and *"the views and preferences of persons likely to be affected"* at all stages of decision-making. If a new proposal (rebates) is effectively a response to problems in an earlier decision (DC Policy), then those two decisions are "significantly interdependent." In such cases, the Council must ensure affected parties can comment on the whole picture, not just a narrow slice. Furthermore, LGA s.82 (Principles of Consultation) says consultation must be inclusive, timely, and informed – people should be given clear information about the proposals and their context. Here, the context is that the DC charges are being dramatically increased (up to +271%, see Section 4.3) and Council's elected members have already *"requested the investigation of DC rebate schemes to encourage redevelopment in the central city."* In effect, the Council acknowledged during the DC Policy process that without mitigation, the policy could harm central city growth, hence the parallel development of rebates. This triggered a second round of consultation. Since the rebates' *stated purpose is to counteract the DC Policy's impact*, fairness dictates that submitters may also critique or propose changes to the base policy in this context. LGA sections 77–79 reinforce that Council should take a coordinated approach to decision-making when issues are connected. Failing to do so may render the process vulnerable to judicial review for excluding relevant considerations.

2.3 Demand for Remedy

Given the above, this submission formally requests a remedy to address the procedural deficiency. Specifically, the Council should re-consult on an integrated framework (the DC Policy + Central City incentives together) by 31 October 2025, so that stakeholders can evaluate the combined effect and trade-offs. At minimum, if the Council insists on proceeding now with only the rebate schemes, it should publish the section 76 LGA "significance assessment" for the base DC Policy changes by 31 July 2025 to justify why those massive changes (e.g. central city DC rising ~264%) were not treated as significant enough to trigger broader engagement. It is arguable that the hike in DC charges and the need for rebates are "significant" matters for the city's future – affecting housing affordability, urban form, and Council's strategic objectives. If no proper significance assessment was done, or if the assessment is now altered by the introduction of rebates, the decision-making process may not comply with LGA s.76. In summary, this submission asserts its standing to comment on base DC charges as well as rebates, on grounds that the latter cannot be fairly assessed in isolation. We urge Council to rectify the process to ensure natural justice, or risk decisions that are predetermined and legally challengeable.

3 LGA 2002 Legal Framework and Statutory Tests for Development Contributions

Several key provisions of the Local Government Act 2002 govern the lawful imposition of development contributions:

- LGA s.199(2) – A council may require a development contribution only if the development “generates a demand for new or additional assets or assets of increased capacity” and the council either has incurred or will incur capital expenditure to provide for that demand. In short, there must be a causal nexus: growth must drive the need for new infrastructure. If such a demand doesn’t exist, charging a DC is not permitted.

- LGA s.197AA – This section (added in 2014) states the purpose of DC provisions is to enable councils to recover from developers a fair, equitable, and proportionate share of the capital costs necessary to service growth. It is essentially a fairness mandate: growth should pay for growth, but only the fair portion.

- LGA s.197AB – This section lays out principles for DCs, reinforcing that charges should be proportional to the demand a development places on infrastructure and beneficiaries pay in reasonable measure. Importantly, one principle is to avoid “over-recovery” of costs from development – councils shouldn’t charge more than needed for growth, nor require contributions if capacity exists to support the development without new expenditure. Another principle is transparency in cost allocation to those who create the need vs. the wider community.

- LGA s.101(3) – When making funding decisions (including DC policies), councils must consider the overall impact on the community and the distribution of benefits/costs. In other words, even if a charge can be justified in isolation, the council should moderate charges if the combined effect undermines community outcomes or well-being. Section 101(3) is a backstop that requires strategic alignment – funding tools shouldn’t thwart a council’s own goals (e.g. housing affordability, climate commitments).

In summary, the law requires DCs to be justified by actual growth costs (s.199), and to be fair and proportionate (s.197AA/AB) with a check against broader community impact (s.101(3)). The following sections outline how the current Draft DC Policy fails these tests in the Central City context.

3.1 Foundational Breach: No Demand Nexus (s.199(2))

Christchurch's Central City does not meet the legal test of generating demand for new infrastructure, yet the Draft DC Policy would impose large charges on central developments. The Council's own project schedules show a few CBD-area projects nominally linked to "growth," such as street improvements (e.g. a Colombo Street active travel route, High Street upgrades) and other network enhancements. However, none of these are demonstrably required by incremental development, because the Central City has enormous surplus infrastructure capacity resulting from the post-earthquake rebuild. The SCIRT program (Stronger Christchurch Infrastructure Rebuild Team) spent approximately $2.2 billion from 2011–2017 rebuilding pipes, roads, and utilities across the city. This rebuild was funded for recovery, not growth, but it effectively delivered brand-new infrastructure with a design life of 50+ years. The networks in the CBD were built to accommodate future populations and were *"put back on its feet"* with ample headroom.

Critically, the Central City's current demand is far below this infrastructure's capacity. Pre-earthquake, the central city (inside the Four Avenues) hosted tens of thousands of jobs and residents. Today, the population is rebounding but still modest: 9,160 people live in the Central City as of 2024. Employment within the Four Aves has recovered to about 50,400 jobs (2024), meaning on a weekday the daytime population could approach ~60,000. Even so, this level of activity remains well within the capacity of the rebuilt infrastructure:

- Water, Wastewater, and Stormwater: SCIRT replaced or repaired these networks to modern standards and likely sized them for pre-quake usage plus future growth. There is no indication of any capacity shortfall – in fact, Council has not identified any new CBD water/wastewater projects *caused by* infill development.

- Transport: The central city street network was also rebuilt or improved post-quake. With fewer people and cars in the CBD for much of the past decade, there is excess road capacity. Traffic levels have been rising with the return of businesses, but congestion is still less than in peripheral areas. The Draft DC Policy includes central city road improvements (e.g. streetscape and active transport projects), but these are quality-of-life or level of service enhancements, not capacity expansions solely due to growth. They would likely be needed to attract people regardless, and do not satisfy s.199's test of *"required… as a consequence of development"*. In fact, the Long Term Plan (LTP) 2024–34 defers around $17 million of planned CBD infrastructure projects due to low demand, implicitly admitting growth hasn't materialized as projected, so capacity isn't yet needed.

A real-world proof of the no-demand nexus is Williams Corporation's own development activity: over the past several years, Williams Corporation has delivered ~850 new homes (townhouses and apartments) in Christchurch's central city. These projects did not necessitate any major new infrastructure – they plugged into the excess capacity created by the earthquake rebuild. By sharing services (e.g. multiple units on land that once had one house) and efficient design, intensification has actually reduced per-capita demand on infrastructure compared to sprawl. Williams Corporation added 850 homes with essentially *zero* growth-driven infrastructure upgrades required (no new pumping stations, no road widenings exclusively for these units, etc.). This demonstrates the Central City's situation: charging DCs here is effectively charging for "non-existent" demand, amounting to an unjustified tax. Under LGA s.199(2), that is unlawful. If Council proceeds regardless, it risks the charges being struck down in court for lack of a proper demand/cost nexus.

3.2 Perverse Calculation Methodology

Not only are the central city DC charges unjustified by demand, but their method of calculation is fundamentally flawed and self-defeating. The Draft Policy proposes massive DC increases – in some catchments up to ~270% higher than the current charges. For example, the Central City charge jumps from about $8,127 to $29,563 per unit (+264%). These hikes are largely a mathematical artifact of lower growth projections: the Council's revised 30-year growth forecast plummeted from ~2.0% annually to 0.52%. When growth assumptions were slashed, the fixed pool of planned infrastructure costs was spread over far fewer new households, driving the per-unit DC sky-high. In essence, Council is responding to slower growth by charging more per development, which predictably will discourage development and *further* slow growth – a vicious spiral. This is economically irrational:

- Affordability Impact: For a typical central city apartment, a DC of ~$30k (plus GST and financing costs) adds roughly $40,000 to the price by the time it's sold. This pushes many units out of reach of first-home buyers, especially since government price caps for assistance (First Home Grants, etc.) hover around the mid-$500k range for Christchurch. An extra $40k easily breaks those caps. Thus the policy directly undermines housing affordability in the very location (the central city) where the Council *wants* more affordable homes and more residents.

- Rent Impact: If absorbed by investors or landlords, a $40k higher cost per unit translates to roughly $75–100 in additional weekly rent (once mortgage or opportunity cost is factored) to maintain the same yield. That is a significant burden on renters. The likely outcome is essential workers and young renters get priced out of the CBD, opting for older units or places further out. This conflicts with Council's urban renewal goals.

- Distortion toward Greenfield: Developers facing a ~$30k per unit DC in the city will logically look to other areas. If building on a greenfield fringe also incurs DCs, those might now be similar or less (e.g. some suburban catchments are set around $29–37k per unit, comparable to central). Given less complexity in greenfield construction, the incentive is to choose greenfield over infill, since the cost advantage of infill (using existing infrastructure) has been erased by DCs. This will fuel urban sprawl – exactly opposite to Christchurch's climate and spatial plans.

- Climate and Congestion Costs: The "easy" option of peripheral development carries hidden costs: each household pushed out of the central city will likely generate car commutes and emissions. By one estimate, a typical suburban household's commuting can produce around 4.5 tonnes of CO_2 per year (a figure consistent with a single petrol car's annual emissions). Additionally, 1,000 homes built on the city outskirts instead of centrally could add over 2,000 peak-hour car trips on our roads (assuming two commuters per household), worsening congestion for everyone. These externalities are ignored in the DC model, which is a narrow financial calculus. Under s.101(3)(b) LGA, Council must consider "the overall impact of… charges on the community", and by pricing people out of the city, it clearly breaches this principle.

In short, the calculation approach of dividing a largely fixed capital program by a shrunken growth denominator is counterproductive. It creates a death spiral: high charges deter development -> growth slows more -> even fewer HUEs to fund infrastructure -> pressure to raise charges again. This dynamic is evident in the current proposal and is antithetical to Council's stated objectives (revitalizing the central city, providing affordable housing, etc.). It represents a failure to apply strategic judgement to the raw model outputs, which s.101(3) and good governance demand.

3.3 Implicit Admission of Flaws

The very existence of the rebate schemes is an implicit admission by Council that the DC Policy as drafted is unworkable in the central city. Council officers and reports have essentially acknowledged that without intervention, the new DC charges would stall development in Christchurch's core. The rebates are a token attempt to "cure" this unviability, but they are grossly insufficient and short-lived:

- Scale: Only $7 million total is allocated across the two schemes (with caps per project). By Council's own estimates, just a handful of developments (perhaps 4–5 projects) might exhaust these funds. After that, new central city projects would face the full brunt of the DCs, meaning the problem isn't truly solved – just deferred for a lucky few.

- Duration and Uncertainty: The rebates expire in June 2027. This "window" is very short in development terms; a project conceived now might only just be completed by 2027. There is no guarantee of extension after that. This creates a planning nightmare for investors – it's like a lottery where only those who fast-track in time get relief. Such uncertainty *deters* the long-term, larger-scale investments the Council wants. Serious developers may simply avoid Christchurch, or wait on the sidelines, rather than gamble on transient incentives.

- Illegality Not Cured: A crucial point is that offering a rebate doesn't fix the underlying legal non-compliance (if the DC charge itself is unlawful under s.199(2) or s.197AB). An unlawful charge, rebated in part, is still unlawful to the extent it is charged. For instance, if a central city project truly generates no new infrastructure demand, the law says its DC should be $0. Giving a 100% rebate (Scheme 2) to a few developments underscores that their proper charge is $0 – but then why are other similar projects asked to pay at all? The inconsistency exposes the legal vulnerability. Council cannot cure an illegal policy by selectively subsidizing it; the correct remedy is to fix the policy itself.

In summary, the rebate approach is a temporary bandage on a fundamentally flawed policy. It may create more problems (complex implementation, perceptions of favoritism, legal risks) than it solves. The rebates tacitly demonstrate Council's recognition that the DC Policy "as-is" would thwart its own goals, yet the chosen fix is inadequate. The rational and lawful solution – as argued in Section 8 – is to adjust the base DC charges or exemptions in the policy itself, not rely on ad-hoc rebates.

4. SCIRT Infrastructure Rebuild & Surplus Capacity

After the Canterbury earthquakes, the Stronger Christchurch Infrastructure Rebuild Team (SCIRT) undertook an unprecedented rebuild of horizontal infrastructure. The program, costing about $2.2 billion (funded by Crown, Council, and insurance), ran from 2011 to 2017. Its scope covered 700+ projects citywide, restoring and upgrading water supply, wastewater, stormwater, roads, bridges, and more. Key attributes of the SCIRT rebuild relevant to DCs:

- It was explicitly a recovery and resilience program, *"repairing and reconstructing… horizontal infrastructure"* to at least pre-quake functionality. Funding came outside of development contribution mechanisms (mostly central government and insurance). Therefore, the assets built are already paid for by the community and should not be charged again to developers under "growth" – doing so would be double-dipping, violating DC principles.

- SCIRT infrastructure was generally built with a long design horizon (50+ years), anticipating future needs. For example, pipes were upsized or modernized to improve performance and accommodate growth over decades. The effective capacity of the rebuilt networks far exceeds the current load. This is evidenced by metrics like water supply and wastewater volumes: the central city's population and employment in 2025 are still well below the system's limits (the city's water strategy notes plenty of headroom given the loss of CBD population post-quake).

- The daily population served by central city infrastructure is recovering but was, until recently, only on the order of 25,000–30,000 people (including workers and residents). Now it may be ~60,000 on a weekday, but even that is within the capacity SCIRT built for. For instance, the new Bus Interchange handles current passenger volumes easily and was built to accommodate much higher bus frequencies as the city grows. The road network, while modified (e.g. street two-way conversions, pedestrianizations), is under far less strain than pre-quake when ~50,000 workers plus tourists were commuting daily. Utilization of some infrastructure is arguably under 50%. Christchurch's Chief Infrastructure Officer noted in 2017 that many rebuilt assets won't hit capacity for decades given current growth rates.

A concrete example is in Williams Corporation's developments: we have completed numerous central city projects (totalling 850+ homes within the Four Avenues). These projects connected to existing water and sewer mains that were rebuilt by SCIRT. In no case was capacity an issue. There was no need for new pumping stations, no augmenting of trunk pipes. Our intensification reduces per-capita loads: e.g. six townhouses on one section share one lateral connection where previously one house had one – a more efficient use of infrastructure. Also, central city residents tend to have lower car usage (many of our buyers have no car), reducing strain on roading and parking infrastructure relative to suburban subdivisions. All these points underscore that Central City development today is largely consuming the surplus capacity created by past public investment, not triggering new capital spend.

A telling data point: The Council's own Long Term Plan (2021 and 2024 iterations) showed deferred capital projects in the CBD due to slower uptake. Around $17 million of growth-tagged projects were deferred in the 2024–34 LTP because development hadn't proceeded as fast as hoped. This further confirms infrastructure is ahead of demand. If there were genuine pressure (e.g. water pipes nearing capacity), Council would be accelerating projects, not postponing them.

In summary, the SCIRT rebuild endowed Christchurch – especially the central city – with modern infrastructure built to accommodate growth over a long horizon. We are still early in that horizon; thus, charging full DCs in the central city now is both illogical and inconsistent with LGA s.199(2). Development is utilizing existing capacity that was paid for by the public post-quake, and that capacity should be treated as a sunk benefit to encourage repopulation of the core, not as an opportunity to levy new charges as if it didn't exist.

4.2 Legal Effect: Charging for Non-Existent Need

Imposing DCs in a situation of demonstrable surplus capacity essentially turns the contributions into an impermissible tax. The LGA requires a causative link between development and the need for new capital works. If Council cannot identify specific, *additional* capital projects required because of a given development (as opposed to projects that are nice-to-have or were already needed irrespective of that development), then it fails the statutory test. As outlined above, no material "growth" projects are needed for Central City infill right now:

- Williams Corporation's 850 homes (and other developers' apartments) have not caused infrastructure upgrades. The Council has not cited any instance of, say, a CBD residential development triggering a new reservoir, treatment facility, or road widening. Instead, it is seeking DCs largely to fund *past or planned general improvements* (which are either earthquake recovery, renewal, or level-of-service in nature). Using DCs to fund non-growth projects is unlawful.

- If Council believes any project in the DC schedule is growth-driven for the Central City, we challenge that. For example, the High Street (Tuam to St Asaph) improvements are listed in the Draft Policy's schedule (as noted in Council meeting documents). But this project is part of the Accessible City transport plan from the Central City Recovery Plan –

it's about making High Street pedestrian-friendly and adding cycle lanes. That is a regeneration initiative, not required *by* new apartments on High Street. The street could function for more residents without that project; it's being done to enhance amenity and encourage development (which is great, but then it should be funded via regeneration budgets or general funds, not as if new residents "caused" it).

Legally, demand that does not exist cannot be charged for. Any DC charged without a valid s.199(2) basis is vulnerable to legal challenge and potential refund. It would also violate LGA s.197AB(a), which echoes that DCs should only be required if development "will create or has created a requirement for new assets". Moreover, s.197AB(b) says to avoid over-recovery – charging developers more than the fair portion of growth costs. If capacity exists, then using DCs to recover sunk costs (already funded by past rates/taxes) is "over-recovery" from new developers.

Finally, it's worth noting an equity and legitimate expectation issue: Many landowners in the CBD had existing use rights and credits for demolished buildings. Council's prior policy wiped those credits after 10 years, which many view as unjust (the infrastructure that serviced the old building is still there, ready for a new one). Now Council proposes to partially restore those credits via Scheme 1 (for buildings standing as of March 2024). But for sites that were cleared earlier, Council has effectively extinguished their vested rights to an infrastructure credit. For those owners to now face high DCs for rebuilding what was once there is tantamount to a double charge. This offends the principle of fairness (s.197AA) and no over-recovery (s.197AB). Williams Corporation, for instance, built on sites where older buildings had been demolished long ago; the networks we connect to were paid for by those former users, yet we've been asked to pay DCs anew. This illustrates the unfairness and potential illegality of charging when no new capacity is actually needed – it's a form of taxation beyond what the LGA permits.

5. Rebate Policy Structure & Funding Flaws

5.1 Scheme 1: "Existing Demand Credits" Rebate ($5m cap)

Scheme 1 aims to reinstate or extend DC credits for sites in the central city that had buildings pre-earthquake but lost their credit (due to the 10-year expiration rule in the DC policy). While the intention – to recognize prior demand so redevelopment isn't penalized – is sound, the scheme is structured in a flawed and possibly unlawful way:

- Retrospective Cut-off Date: The eligibility is tied to whether a building was still standing on the site as of 1 March 2024 (with walls and roof intact). This means the policy looks back in time to confer a benefit/penalty based on a past condition. Any site cleared before that date is excluded (unless Council uses the "option" to include vacant sites, which is uncertain). This is an arbitrary retrospective condition. Under Legislation Act 2019, s.12, there is a general presumption that laws and policies should not have retrospective effect unless explicitly justified. Council did not signal this date criteria in advance to landowners – it was introduced in mid-2025 but affects rights as of 2024. For those who, for example, demolished a derelict structure in 2023 (perhaps for safety or aesthetic reasons), this rule perversely punishes them by denying the credit, whereas someone who left a ruin standing gains a credit. Such inconsistency could be challenged as irrational or unfair in a public law sense.

- Extinguishing Vested Rights: Prior to 2015, Christchurch's DC policy did not expire credits so quickly. Many property owners would have expected that if they rebuild the same scale, they owe no DC (the "like-for-like" principle acknowledged on Council's website). Council's decision to expire credits after 10 years – and now only partially restore them – undermines legitimate expectations of fairness. LGA s.197AB(c) says DC policies should *"acknowledge and provide for contributions already made"* (which credits do) and avoid over-recovery. By limiting the credit restoration to certain cases and not others, the scheme may violate this principle. It effectively over-recovers from those who just missed the cut-off (charging them full DC even though they contributed infrastructure historically).

- Legal Authority: There's a question whether Council can retroactively grant financial benefits like this without breaching other laws (e.g. the Local Government (Rating) Act and provisions about uniform treatment of ratepayers). While this is a DC remission, which councils can do, the way it's targeted might be seen as ultra vires if it conflicts with general law principles. Notably, s.12 of the Legislation Act 2019 codifies the presumption against retrospectivity – any departure from this in a Council policy opens risk.

- Expiry and Uncertainty: Scheme 1 has a $5 million total cap and ends by 30 June 2027. This creates a "use it or lose it" rush. Developers cannot rely on it being around in 3–5 years. If multiple projects claim large credits, the fund could run dry. This could result in a "lottery" where some get relief and later applicants get nothing, raising equity concerns. Moreover, if a large development spans multiple sites, the $1m per-development cap could leave some credits unused (if a prior building's credit value was more than $1m DC, anything above is effectively wiped). This undermines the goal of fairness to those sites.

In summary, Scheme 1 is well-intentioned in acknowledging prior use, but its cut-offs and caps are problematic. A lawful approach would be to simply change the underlying DC Policy to remove the 10-year expiry for central city credits (or extend it significantly for quake-affected sites). That would treat everyone fairly and avoid these arbitrary distinctions. By doing a limited rebate instead, the Council opens itself to claims of breaching general legal norms (no retroactive rules) and LGA DC principles. It also may not achieve its objective if funds run out, leading to disillusionment and possibly legal challenges from those who miss out.

5.2 Scheme 2: Central City Residential Rebate ($2m cap)

Submission #37387

Scheme 2 offers a 100% DC rebate for central city residential developments of at least six storeys, with a $2m funding pool and $1m cap per development. This scheme is clearly aimed at stimulating high-density apartments. However, its design raises several issues:

- Ultra Vires Covenant (Planning Control via DC): To qualify, a development must place a covenant on each title restricting it to residential use only (no short-term accommodation). This is unprecedented in DC policy. Council is essentially using a financial incentive to enforce a land-use outcome (no AirBnB/hotel use) that is not required by any infrastructure demand difference. Whether an apartment is owner-occupied, rented long-term, or used as a serviced apartment has no impact on water pipes or roads – the number of units/people is what drives demand, not the tenancy terms. Thus, imposing this covenant as part of a DC remission is unrelated to the purpose of DCs (funding infrastructure) and strays into regulatory territory of the RMA (which typically governs land use via the District Plan or resource consents). Council does not normally have power to dictate property usage via a contributions policy, so this condition is likely ultra vires the LGA. It could also be seen as an attempt to do an *"end-run"* around proper planning procedures – e.g. if Council wants to limit short-term rentals in the CBD, it should do so via a bylaw or plan change, subject to the required consultations and legal tests, not by leveraging a DC rebate. There is a significant legal risk that this aspect of Scheme 2 could be struck down if challenged by a developer or landowner, as it is not authorized or contemplated by the DC provisions of the LGA.

- Arbitrary 6-Storey Threshold: The requirement that the residential component be at least six storeys tall is arbitrary and creates inequity. A five-storey building with (say) 40 apartments has virtually the same infrastructure impact as a six-storey building with 48 apartments (assuming footprint is similar). Yet the former would get no rebate (and pay full DCs on all units, likely killing its feasibility), while the latter would pay nothing in DC. This "cliff edge" incentivizes potentially suboptimal outcomes – developers might add a token extra storey (perhaps with little aesthetic or contextual merit) just to qualify. It also penalizes the "missing middle" – smaller-scale projects like 3–5 storey developments, which are often more suitable for certain sites and provide more affordable individual units. These smaller projects are typically what first-home buyers and local builders deliver, as opposed to six-storey+ which often involve larger commercial developers. By excluding anything under six levels, the Council is effectively saying a five-floor 20-unit building must pay, even though those 20 units also help meet the resident growth target and use the same surplus infrastructure. This could slow down a whole segment of development that's crucial for incremental intensification and neighborhood-scale growth.

- No Nexus to Infrastructure: The rebate is 100%, which again is an implicit acknowledgment that the "fair" DC for these central city apartments is $0 (because they don't require new infrastructure, as argued earlier). However, it then withholds that $0 charge unless you meet conditions (6 floors, covenant). From an infrastructure standpoint, a 4-storey building in the CBD also likely requires $0 of new capex. So the condition is not about infrastructure at all – it's about urban design or population targets. This disconnect means the scheme violates LGA s.197AB(a) (DCs/remissions must relate to effects or requirements created by development). Using DC rebates to pursue unrelated policy objectives (like encouraging a certain building typology or residency pattern) is not what the DC provisions were intended for.

- Circumvention of Democratic Planning: The six-storey rule and the no-short-term-let covenant effectively create a mini planning regime: "if you build a tall building and promise it will be full of permanent residents, we'll waive fees." While increasing central city residents is a valid goal, doing it via a selective financial deal sidesteps public debate on whether, for example, 4–5 storey developments should also be encouraged, or whether short-term accommodation is actually a problem. The District Plan does not forbid short-term accommodation in the Central City zone currently – in fact, having a mix of hotels or serviced apartments is part of a vibrant city. If Council believes too many apartments are going to Airbnb and not contributing to resident population, the proper approach is a policy/budget to incentivize long-term occupancy or a regulation on short-term rentals, subject to public input. By tying it to DC rebates, they avoid a broader discussion and only those developers in the know (and who can finance a tall building) benefit. This is a procedural fairness concern.

- Scale and Efficacy: With only $2 million total funding, at best 2–3 large projects might benefit (given the $1m cap each). That could be on the order of likely less than 100 apartments total (depending on project size). While helpful to those projects, it's nowhere near the scale needed to reach the 20,000 residents by 2028 goal – which requires roughly 11,000 more residents, or about 5,500 homes (assuming ~2 people/household). The scheme might deliver a few hundred units by 2027 – not enough to move the needle. And if those projects would not have proceeded without the rebate, what happens when the fund is exhausted? It's back to square one, with subsequent proposals facing crippling DCs. In short, Scheme 2 is inadequately funded and temporally limited, so as a strategy, it likely fails to achieve the long-term objective.

- Environmental/Design Perversity: A subtle downside is the incentive to go taller at all costs. Some locations in the central city might be better suited to 4–5 storey buildings (for heritage context, sunlight, human scale). But developers, chasing the rebate, may propose six storeys even where it's not ideal, leading to more resource consent battles or less context-sensitive design. Good urbanism is not simply "the taller the better" – a mix of building heights creates more interesting cityscapes and can be more affordable. By only favoring 6+ storeys, Council could be skewing the development pattern in a way that ignores community preferences and good urban design principles for certain neighborhoods (many people might happily accept a 4-storey on their street but balk at 7-storey). This could ironically stir more opposition to intensification if people see the policy favoring towers everywhere.

To sum up, Scheme 2, while ostensibly pro-development, is legally questionable and practically limited. It attempts to engineer outcomes (tall, exclusively residential buildings) through a blunt financial tool, rather than address the core issue (the DC charge itself). It would be far more straightforward and lawful to simply reduce or zero-out DCs for all central city residential developments, period, until the infrastructure capacity is actually utilized (as recommended in Section 8). That would achieve the same incentive for all projects (big or small) without these convoluted strings attached.

5.3 Overall Flaws of the Rebate Approach

Looking at both schemes together, several overarching flaws emerge:

- Insufficient Funding & Equity Issues: The combined $7m pool is minor relative to the scale of development needed. If many apply, it's first-come, first-served – leading to a potential lottery. Those who miss out (through timing or caps) will feel unfairly treated. This undermines the equity principle in s.197AA (fairness between developers). By contrast, other councils have done more robust, longer-term incentives (e.g. Hamilton's CBD DC remission of 66% that lasted ~7 years, now tapering to 50%). Hamilton's scheme applied to *all qualifying developments* over a large period – it wasn't capped by a dollar amount or requiring covenants. Christchurch's approach is more restrictive and thus more inequitable.

- Complexity and Uncertainty: Developers now have to navigate extra criteria, legal covenants, and the risk the fund depletes. Uncertainty is the enemy of investment. A straightforward policy (like "Central City DC charge = $0 until 2030") would send a clear market signal. The current proposal sends a mixed message: *"DCs are high, but maybe you get a rebate if you do X and Y by date Z."* Many will respond cautiously by not investing at all. Some may even wait, speculating that Council will extend or expand the rebates later (especially if these prove insufficient) – thus *delaying* projects that might have happened sooner under a clear no-DC regime.

- Administrative Overreach: Administering the covenant and enforcement, tracking the $ caps, deciding who gets the vacant site extension, etc., all add bureaucracy. It also invites debate: e.g., what if a building is six storeys but partly offices? (The scheme says "residential development or residential component" 6 storeys – implies mixed-use with 6 floors of apartments could qualify? It's a bit unclear.) Council staff will have to make judgment calls, potentially leading to disputes or inconsistent outcomes. This complexity is unnecessary if the goal is simply to spur more housing.

- Contradiction with Best Practice: Other cities have shown better ways. For instance, Hamilton's CBD remission (recently extended to 2021) was lawful, broad-based, and effective, waiving two-thirds of DCs for all central city development without onerous conditions. Christchurch's proposal, by contrast, mixes in unrelated conditions (covenants) and is temporary. If Hamilton found it worth forgoing 66% DC to revitalize their CBD, Christchurch's token $7m (effectively foregoing maybe 200 HUEs worth of DC at $30k each) seems timid. Also, Hamilton signalled its remission well in advance and updated it periodically, providing more certainty to developers.

- Ignores Proven Models: Williams Corporation and others have already been delivering central city housing under the previous DC settings (which were lower). Our track record – hundreds of homes built, purchased by first-home buyers, with no strain on infrastructure – is proof that the city can grow successfully with low or zero DC in the core. Rather than build on this success, the Draft Policy threw up a roadblock (high DCs), then offered a shaky detour (rebates). It would be far better to incorporate the successful elements directly: e.g., recognize the environmental and infrastructure efficiencies of CBD development by setting a low DC rate for the Central City catchment (perhaps nominal $5k per unit or zero until a threshold). This would acknowledge that such development supports Council's climate and urban goals, and costs less per unit to service.

In conclusion, the rebate schemes, as structured, are not the right solution. They overcomplicate what should be a simple adjustment of policy, they may breach legal and equity principles, and they fall short of what's needed to truly align the DC regime with Christchurch's regeneration strategy.

6 Quantified Impacts on Housing, Affordability, and Sustainability

The proposed DC charges (and by extension the limited rebates) have real, quantifiable impacts that run counter to Christchurch's needs:

- First-Home Buyer Affordability: As noted, a DC increase from ~$8k to ~$30k per unit in the central city means roughly +$22k upfront cost per unit (+GST), which then accrues financing costs and developer margin. This easily becomes $35k–$40k added to the sale price. For example, a one-bedroom apartment that could have sold for $480k might now need to be $520k+. Government support programs (First Home Grant) in Canterbury currently cap new build prices around $550k (and existing homes ~$500k). Pushing prices above these caps means young buyers lose access to grants or KiwiSaver withdrawals, putting units out of reach. It's no coincidence that many of Williams Corporation's central city homes were priced to meet first-home criteria – we recognize that's where demand is. A ~$40k jump knocks many would-be buyers out of contention, or forces them to purchase cheaper, less efficient homes further away. This directly exacerbates the housing affordability crisis, when we should be easing it.

- Rental Affordability: The majority of new city apartments end up in the rental pool (either initially or eventually). A landlord facing higher development costs will look for higher rent. Roughly, $40k extra cost might require ~$80/week more rent to be financially neutral (assuming a 5-6% gross yield needed). Thus a unit that would rent for $450/week might need $530/week – a big difference for a nurse, hospitality worker, or young professional. That could force such workers to live in outer suburbs where rent is lower, at the cost of long commutes. Christchurch already struggles to attract and retain talent; high downtown rents won't help. Additionally, higher rents mean higher Accommodation Supplement payouts by the Government (a transfer effectively subsidizing the DC via welfare), which is inefficient.

- Carbon Emissions: For every household that doesn't live in the walkable central city and instead lives in a car-dependent location, annual CO_2 emissions jump significantly. US data (EPA) indicates a typical car emits ~4.6 tonnes CO_2/year; NZ numbers are similar. If living in the CBD allows a household to be car-light or car-free, that's a ~4–5 tonne reduction per year per household. Conversely, development diverted to greenfield subdivisions means thousands more car trips. For 1,000 households (roughly what might have been built in the CBD over a few years if DCs were low), placed on the periphery, that's on the order of 4,500 tonnes CO_2 extra per year from commuting alone. Over the assets' lifetime (say 50 years), that's 225,000 tonnes – a huge carbon cost attributable to this policy choice. This undermines the Council's Climate Emergency declaration and emission reduction goals.

- Traffic Congestion: Those same 1,000 peripheral households translate to at least 2,000 additional daily car trips in peak hours (assuming roughly two working commuters per household, each making a trip in and out). Christchurch's traffic is very sensitive to growth – a couple thousand more cars at peak can mean noticeably more congestion on main routes and CBD parking demand. This runs counter to efforts to boost public transport and active travel. The DC policy inadvertently incentivizes a development pattern that adds to congestion, imposing costs on all commuters (time lost, more road maintenance, etc.).

- Lost Economic Activity: Every unbuilt project is a loss of jobs and GDP for the city. Construction is a big driver of the local economy. The NZ Institute of Economic Research and others often use multipliers for construction – e.g. around 2.3 jobs per $1m of construction and about $2.5m contribution to GDP per $1m spent (this includes direct and indirect impacts). So, if $100m of development (say ~300 apartments) is shelved, that's roughly 230 jobs not supported and $250m of GDP foregone. On an annual basis, if central city development slows by even $30m/year, that's ~75 jobs and $75m GDP not happening in Christchurch that could have – quite significant. Moreover, each new resident in the CBD contributes to the local economy (café sales, retail, etc.). Council's own analysis shows central city growth has positive spillovers – e.g. each new household downtown is estimated to generate several thousand dollars of rates revenue and local spending. Williams Corporation's completed CBD projects, for instance, contribute over $2.5 million in rates revenue annually (averaging maybe $2,500–$3,000 per unit) to Council – a stream that wouldn't exist if those units weren't built.

- "Death Spiral" in Numbers: Slower growth = fewer DC receipts in future = Council might further raise DCs or rates to cover infrastructure, which in turn = even costlier development. This feedback loop can be seen in the extreme percentage increases proposed now (stemming from previous overestimation of growth that didn't occur). It's a cautionary tale: stick with a high DC regime, and you could see a scenario where each LTP cycle, projected growth is revised down, requiring even higher charges, causing further flight of development – a downward spiral. Quantitatively, if a 0.5% growth assumption yields ~$30k DC, what if growth is actually 0% in some years? The model breaks down – you can't fund infrastructure on the backs of development that isn't happening. Eventually, residents pay through general rates anyway, after years of lost opportunities.

Overall, the evidence indicates the DC policy will inflict economic damage and social costs far outweighing the contribution it seeks from developers. It prices out the very people the city needs for a vibrant future, and it shifts costs in hidden ways (more traffic, emissions, higher rents) onto the wider public and future generations. This is economically myopic.

6.1 Strategic Policy Conflicts

The Draft DC Policy (and by extension the half-measure rebates) conflict with numerous adopted strategies and obligations of the Council:

- Christchurch Long Term Plan (LTP) 2021–31 and 2024–34: The Council set a goal of 20,000 central city residents by 2028. Current population ~9,160 means adding ~10,840 in 4 years – roughly 5,000 dwellings. This goal will be mathematically impossible if DCs add ~$40k cost to each dwelling. Even with rebates, only a few hundred units avoid that cost. Thus the policy virtually ensures the target will be missed by a wide margin. The LTP also emphasizes urban regeneration and encouraging central city living; the DC approach undermines those priorities, indicating a lack of internal consistency in Council's financial planning vs. strategic planning.

- Climate Emergency Declaration (2019): Christchurch City Council declared a climate emergency and has a responsibility to actively reduce emissions. One of the biggest levers is urban form – encouraging intensification to reduce transport emissions. This DC policy works against that by incentivizing sprawl (as shown by the CO_2 impacts in 7.1). It is policy incoherence to, on one hand, invest in cycleways and declare climate emergencies, and on the other hand impose fees that discourage people from living in the very places that support low-carbon lifestyles. It could be argued that adopting policies that knowingly cause higher emissions may breach the Council's duty of care in climate matters (if not legally, then morally and politically).

- National Policy Statement on Urban Development (NPS-UD): The NPS-UD directs cities like Christchurch to enable greater heights and densities, especially in and around the city center and transit hubs, to accommodate growth and improve housing affordability.

Christchurch's District Plan was recently amended to comply (up-zoning many areas). However, planning capacity means little if economic feasibility is killed by DC charges. By driving development to cheaper peripheral land, the DC policy is at odds with the NPS-UD's intensification objectives. In effect, it's a locally-created barrier that negates some benefits of the national directive.

- Housing and Urban Development (HUD) / Government Policy: The Government is pushing for more affordable housing and even considering reforms to development contributions nationwide by late 2025 (as noted by the Property Council). Council's rush to implement steep DC increases before those reforms is noted with concern by many. Strategically, if government introduces a new developer levy system in 2025 that perhaps caps or moderates charges, Christchurch might be out of step. Also, the policy harms housing supply in the interim, which goes against the central government's efforts (like KiwiBuild, Affordable Housing funds, etc.) that rely on local cooperation.

- Central City Revitalisation Plans: The Council has numerous initiatives – grants for residential conversions, events and marketing to draw people in, etc. – to make the central city lively. High DCs siphon away private investment that is needed to fill empty lots with buildings and people. It's contradictory to spend rates on one hand to attract development (e.g. grants, rebates) and simultaneously push developers away with a hefty charge. The net effect is self-cancelling. Strategically, Council should choose: do you want a thriving central city (then lower/remove DCs), or do you want to maximize short-term DC revenue (then accept a stalled central city)? The current path tries to have it both ways (via a tiny rebate) and thus achieves neither goal well.

- Economic Development Strategy: ChristchurchNZ and the Council have strategies to attract businesses, talent, and tourists. A vibrant, populated downtown is key to that. If essential workers and young talent can't afford to live in the city, it undermines talent attraction (people often choose cities for lifestyle – a hollowed-out center is not appealing). Also, less construction means fewer construction jobs and apprenticeships at a time when the city should be training the next generation of builders and tradies. The ripple effects of a slowdown could hit the local economy broadly (suppliers, consultants, etc.). This contradicts the city's recovery and growth narrative post-quake.

In short, the DC policy as it stands is inconsistent with almost every high-level strategy the Council has. It would push outcomes in the opposite direction of what's desired for climate, transport, housing, and economic vibrancy. Good governance requires aligning financial tools with policy goals – here they are misaligned. This not only weakens achievement of those goals, but could expose Council to criticism or oversight (for example, Audit NZ or the public asking why Council adopted measures undermining its own climate or LTP targets). The prudent course is to amend the policy to restore alignment (see Section 8 for recommendations).

6.2 Williams Corporation Case Studies – A Proof of Concept

Submission #37387

Williams Corporation's experience in Christchurch's central city provides a case study of the benefits of enabling intensification – benefits that are now at risk:

- We have delivered over 800 homes within the four avenues, the owners and/or occupants are often young couples, single professionals, and small families who now live within walking or cycling distance to work and amenities. Many of them would not have been able to buy a home in the suburbs (due to higher prices or lack of new supply) – the central city provided an affordable option. Each of these households is one less family competing for old suburban houses or adding to greenfield demand. This helps overall housing affordability and creates opportunities for younger people to stay in Christchurch rather than move away for urban lifestyles.

- With those residents now living centrally, over 500 cars are off the road during peak hours that might otherwise be there if those folks lived in Rangiora or Rolleston. Many of our buyers either don't own a car or own one less car because they can now walk, bike, or rideshare in the city. This reduction in vehicle use not only cuts emissions but also reduces congestion for everyone and lessens wear on roads. It's a tangible contribution to a more sustainable transport system.

- The developments have added significant rating base to Council – we estimate $2.5+ million in annual rates from our completed central city projects alone (counting both general rates and targeted rates per unit). And these units are cheap for Council to service: they are on existing rubbish collection routes, existing pipes, etc., so the marginal cost to Council is low. In contrast, a new subdivision often requires new roads to be maintained, new pipe networks, extended bus routes, etc. Thus, intensification downtown is giving Council *more revenue with less ongoing expense* – improving the city's fiscal sustainability in the long run.

- The social benefit is also notable: hundreds of people can now enjoy a city lifestyle – walking to the library, parks, eateries. This contributes to Christchurch's reputation as a modern, livable city. If DCs force these people to live in distant subdivisions, Christchurch loses part of its competitive edge in lifestyle. Moreover, central living is often more accessible for the elderly or those who don't drive – we've sold to downsizers who like being near medical facilities and shops without needing a car.

These benefits are at risk under the new DC policy. The momentum Christchurch finally achieved in its central city recovery (after slow early years) could be lost. It would be tragic to see the "lights go out" on some of these positive trends due to a short-sighted funding policy.

In summary, our case studies show that with sensible policy settings, the market responded and delivered what the city says it wants: more residents, more rates, environmental gains, and urban vitality. The DC policy threatens to undo this progress, which is why we are so adamant that a different approach is needed.

williamscorporation.com

7. Alternative Models & Lawful Solutions

7.1 Primary Recommendation: Zero/Minimal DC Zone for Central City

The simplest and most effective solution – legally and economically – is to make the Central City a special DC zone with greatly reduced (or zero) development contributions, at least until spare capacity is utilized. We urge Council to consider amending the DC Policy 2025 to designate the area within the Four Avenues (and perhaps key adjacent urban areas) as a "DC remission zone" where the charges are either waived or set at a token level for the duration of the current policy. This approach:

- Aligns with LGA s.199(2): If indeed new central city developments are not triggering new infrastructure, then a zero charge is the only lawful charge. This removes the legal risk – you are not charging what you can't justify. It is a defensible position to take that *"because existing capacity suffices, the DC for this catchment is set to $0"* (many councils have $0 DC in certain fully serviced areas). This can be revisited in future if and when capacity gets utilized and real expansion projects are needed.

- Incentivizes Sustainable Development: By eliminating the DC cost penalty for building centrally, Council would send a powerful market signal. Developers will shift focus to intensification where feasible. The economics of projects will improve, leading to more supply of housing where we want it. This helps achieve the climate, transport, and urban form goals without complicated rebate schemes. Essentially, it leverages the market to deliver on public objectives at no direct cost (foregone DC revenue is not a true "cost" if those developments wouldn't happen otherwise, or if the alternative is rates funding the same infrastructure). Hamilton's experience with multi-year CBD DC remissions showed a notable uptick in inner-city investment.

- Supports Climate and Housing Goals: A DC waiver in the central city is effectively a Council subsidy for low-carbon living and housing affordability – which is exactly what Council should be doing in a climate crisis and housing crisis. It internalizes the positive externalities: each central city home benefits everyone (less sprawl, etc.), so it's reasonable for the general community (via rates) to carry a bit more of the infrastructure cost burden to encourage that. Given the numbers, the impact on ratepayers would be negligible – the draft FAQ notes the revenue forgone by rebates would be funded by rates, and that was only $7m. If we extended a DC holiday to all central city development for (say) the next 5 years, how much would that be? Perhaps a few tens of millions at most, which in the scheme of Council's $3 billion LTP budget is minor – and arguably it's not even a loss, because the economic growth and new rates from those developments partly offset it.

- Maximizes Return on Past Investment: Christchurch (with Crown help) spent billions on a city rebuild – but much of it is underutilized until people and businesses return. By waiving DCs, Council would accelerate filling up the capacity of water pipes, roads, etc.

that are currently under-used. This means better ROI on SCIRT's infrastructure – those assets yield community benefit only when they're used by people. If they remain half-empty for 20 more years, that's wasted opportunity. Far better to have them supporting new ratepayers now. Once we truly approach capacity (say the central city population doubles or triples and infrastructure is nearing limits), the Council can then justify reintroducing DCs or other funding for the next wave of expansion. That could be a good problem to have (it means the city has grown significantly).

In implementing this, the Council could choose a threshold or review trigger: e.g., *"Central City DC remission applies until the resident population reaches X or until X year, and Council will monitor capacity annually."* But in our view, setting it in policy for the 2025–28 period at least, with a clear signal it may extend longer, would be sufficient to change perceptions. Developers would flock to take a serious look at central city sites knowing one of their big uncertainties (DCs) is off the table.

- Legal Soundness: Providing a remission or reduced charge in a policy for a defined geographic area is within Council's powers, as long as it's consulted on and justified. The justification is easy: lower cost to service, strategic alignment, etc. This is similar to how some councils charge different DCs by catchment – here one catchment would be $0 due to unique circumstances (rebuild capacity). This can be framed under s.101(3)(b) as well – overall impact on community of charging full rate in CBD is negative, so council chooses to fund that portion from other sources for the greater good. There is precedent: as mentioned, Hamilton did 66% off CBD DCs; Auckland in the past had lower DCs for city centre to encourage apartments (they are now increasing them, but that's because Auckland's city has grown where new infrastructure is needed – not analogous to CHC's current state).

In sum, our primary recommendation fixes the issues at their core: make the central city essentially DC-free for now. This approach is transparent, fair (applies to all developments, big or small), and legally robust, and it directly advances Council's strategic aims.

7.2 Secondary Recommendations (If Rebates are Retained)

If Council is unwilling to adopt the primary solution outright and insists on proceeding with some form of targeted rebates, then several changes are needed to make the schemes lawful and effective:

- Remove Unlawful Covenants/Usage Conditions: Any rebate should be based on infrastructure demand criteria only, not on land use covenants. That means drop the "residential use only" covenant requirement in Scheme 2. If the goal is permanent residents, Council can encourage that in other ways (e.g., by supporting inner-city resident groups, or by monitoring and possibly regulating short-term rentals separately). Tying it to DC rebates is not legally or practically justified. Similarly, do not include any requirements unrelated to the development's demand on infrastructure for Scheme 1 or 2. The rebate should simply waive DCs if certain growth/demand conditions are met (e.g., using existing capacity).

- Broaden Eligibility (No 6-Storey Threshold): Scheme 2 should be expanded to include all multi-unit residential developments in the central city, or at least lower the threshold to something like 3 storeys (which is basically any apartment/townhouse complex). There is no rational reason to exclude 5-storey buildings – they house people too. Ideally, do away with the storey count and just say "any new residential units within Four Aves get DC rebate." If Council is worried about "giving away" too much, then increase the total fund or make it ongoing rather than first-come. But an arbitrary height cutoff is unfair and distorting. A graduated approach could be considered: e.g., full rebate for >6 storeys, 50% rebate for 3–5 storeys – but even that adds complexity. Simpler to treat all housing equally. (Note: commercial developments might still pay DCs, since Council seems focused on residents – though one could argue offices/hotels also help central city vitality and often have spare capacity too.)

- Adopt a Hamilton-style Remission (Permanent & Proportionate): If Council is hesitant to forego 100% of DCs indefinitely, a compromise is a permanent remission percentage for the Central City. For instance, reinstate something like a 66% remission on DC charges in the CBD, as Hamilton did. This would mean developers still pay 34% of the calculated charge, so they have "skin in the game," but the majority is waived to reflect community benefits. This remission could be written into the DC Policy itself (not as a short-term scheme, but as an ongoing policy until reviewed). It avoids the funding-cap issue because it's not capped – it applies to all who come. And it avoids pick-and-choose favoritism; everyone in that zone is treated equally. If in future the situation changes, Council can consult to adjust the percentage (like Hamilton did, reducing to 50% remission in later years). This approach is legally cleaner as it sits within the policy as a calculation step, rather than a discretionary scheme that looks retrospective.

- Include Environmental/DC Reduction Credits: Consider formally recognizing the external benefits of central city development by offering *credits* or reductions for things like brownfield reuse, heritage building conversions, or transit-oriented development. For example, a developer building with no car parks, or on a contaminated site, could get an extra break on DCs because they are reducing future infrastructure costs (less road usage, etc.). Some cities overseas do this to incentivize desirable development patterns. This would align the DC policy with climate goals. It could be as simple as: "Developments in Central City that meet XYZ criteria get an X% DC reduction." Again, it must tie to some rationale in costs – e.g., fewer roads needed if no parking provided.

- Transparency and Industry Engagement (s.17A review): Commit to a section 17A LGA service review of the development contributions and infrastructure provisioning process, to be conducted with input from the development community. The goal being to identify more efficient ways to fund growth that don't undermine growth. Such a review could explore alternatives like targeted rates, infrastructure bonds, Government subsidies (e.g., the Infrastructure Acceleration Fund), etc. By involving developers in the conversation, Council can rebuild trust and perhaps find innovative solutions. In the meantime, that good faith effort might ease some concern that Council is just trying to shift costs to developers without considering wider impacts.

In short, if Council won't adopt a blanket DC waiver for the CBD now, then it must at least fix the rebate schemes' flaws – remove illegal conditions, broaden who benefits, and ideally make the incentive scale sufficient to truly stimulate development. Otherwise, the schemes will not achieve enough to justify their existence, and the city will still suffer the negative consequences outlined.

Williams Corporation stands ready to assist in crafting these improved measures. We, and others in the industry, can provide data and case studies (as we have here) to help design a regime that works for both Council and the community. The development community is not adversarial on this – we want to build the homes and neighborhoods that Council says it wants to see. It's about finding the policy settings that unlock that common goal.

7.3 Williams Corporation Commitment

Finally, we reiterate our willingness to work collaboratively with the Council on lawful, positive solutions. Williams Corporation has a track record of delivering quality urban housing in Christchurch. We are deeply invested in this city's success. We can offer our expertise and experience in any forums or workshops to refine the approach. Our aim aligns with Council's: a vibrant, livable, sustainable Christchurch. We urge the Council to choose the path that enables that – a path where developers are partners in growth, not adversaries caught in legal battles over invalid charges.

In summary, a win-win is within reach: a DC framework that complies with the law, accelerates central city regeneration, and ultimately benefits all citizens. Let's seize that opportunity.

8. Councillor Accountability & Pre-Action Protocol

8.1 Critical Questions Every Councillor Must Answer Before Voting

Before proceeding with any vote on this policy, each Councillor must be able to answer these fundamental questions. Your inability to answer constitutes willful blindness that may remove your good faith protections under LGA s.43:

Infrastructure Justification:

- What new infrastructure did Williams Corporation's 850 central city units delivered to date require? (Documented answer: None)

- If Council deferred $17 million of CBD projects due to low demand, what infrastructure are you charging $29,563 per unit to build?
- How does utilizing existing capacity from the $2.2 billion SCIRT rebuild constitute "new demand" under LGA s.199(2)?

Legal Compliance:

- Can you point to the independent legal opinion (not staff assurances) confirming these charges are lawful?
- How does a covenant restricting residential use relate to infrastructure funding under the Local Government Act?
- When developers challenge these charges in court, what will be your defense?

Policy Logic & Fairness:

- Why must a 5-storey building pay $600,000+ in DCs while a 6-storey building pays nothing?
- How does adding $40,000 to apartment prices help achieve your 20,000 residents by 2028 target?
- What happens when the $7 million rebate fund is exhausted within months?

Strategic Alignment:

- How many tonnes of CO_2 will you be personally responsible for by pushing 1,000 households to car-dependent suburbs?
- How do you reconcile this vote with Council's Climate Emergency declaration?
- Is forgoing $2.5 million in annual rates revenue worth killing central city development?

Personal Accountability:

- Do you understand that under LGA s.44, you can be held personally liable for refunds if these charges are ruled unlawful?
- Are you familiar with the Kaipara District Council case where the Auditor-General considered invoking s.44 against councillors?
- Will Council's indemnity insurance cover you if you vote for charges you cannot justify?

If you cannot answer these questions, you cannot in good conscience vote YES.

8.2 Legal Framework for Personal Liability

Councillors should be aware that persisting with the adoption of an unlawful DC policy exposes them to personal legal risks under the Local Government Act 2002. Sections 44–46 of the LGA provide mechanisms for accountability in cases of financial loss caused by illegal acts or omissions:

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The Section 44 Risk: If the Council incurs a loss due to any action "ultra vires" (beyond legal power), the Auditor-General may report on that loss. If it's found that the loss arose from negligence or wrongdoing by members, those members can be held jointly and severally liable for the loss. This includes situations where a council "unlawfully imposes a liability" - exactly what invalid DC charges would constitute. When developers successfully challenge these charges, the loss includes refunded contributions plus legal costs, potentially millions of dollars.

The Kaipara Precedent: The Auditor-General considered invoking s.44 in the Kaipara District Council (2015) case regarding illegal rates. While ultimately councillors weren't made to pay, the Auditor-General's report was scathing about governance failures. That case involved councillors who ignored legal warnings - exactly what you are doing if you vote YES despite this submission.

Loss of Good Faith Protection: Personal protections under LGA s.43 apply only when members act in good faith and within lawful bounds. Consider this scenario: Council has evidence there is no growth demand in the central city (our 850 units requiring zero infrastructure, your own deferred projects, this submission). Yet you impose DCs claiming growth demand exists. That is acting contrary to fact and law - the very definition of bad faith.

Commissioner Risk: Section 46 LGA allows the Crown to appoint a commission or remove councillors for governance failure. Christchurch's Council is still rebuilding trust post-earthquake and post-commissioner times. Do you really want to risk intervention by adopting a policy that:

- Contradicts your own evidence
- Undermines your strategic goals
- May be struck down in court
- Has been clearly warned against?

8.3 Your Duty to Seek Independent Legal Advice

The 2015 Auditor-General's report on Kaipara specifically highlighted councillors' duty to seek independent legal advice when confronted with complex decisions. Red flags are clearly present here:

- A 264% increase in charges
- No demonstrable infrastructure need
- Ultra vires covenant requirements
- Direct contradiction of Council objectives

Do not simply accept staff assurances - they created this policy and have a vested interest in its adoption. Your fiduciary duty to the community requires you to verify the lawfulness independently.

8.4 Specific Areas of Personal Liability

Financial Exposure:

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- Refunds: When (not if) these charges are challenged, refunds could total millions
- Legal Costs: Judicial review proceedings will cost hundreds of thousands
- Damages: Developers may seek compensation for stalled projects
- Council's Indemnity Won't Cover Knowing Illegality: If you vote despite clear warnings, insurance may not protect you

Political Consequences:

- Rates Impacts: When Council must fund shortfalls from failed policy, ratepayer backlash will target those who voted for it
- Climate Litigation: Emerging climate duties may create liability for decisions that knowingly increase emissions
- Electoral Accountability: Can you defend voting for a policy you couldn't justify?

8.5 Summary

Do not vote for what you cannot defend.

The questions posed above are not rhetorical - they are the actual questions you will face in:

- Judicial review proceedings
- Auditor-General investigations
- Media scrutiny
- Ratepayer meetings
- Court testimony

If you cannot answer them now, in the safety of the council chamber, how will you answer them outside of this setting?

Our Position: Williams Corporation reserves the right to initiate judicial review or other legal action if Council adopts this unlawful policy. This submission serves as formal notice that you have been warned of:

- The lack of infrastructure demand
- The legal deficiencies
- Your personal liability risk
- The availability of lawful alternatives

The Choice: It is far better to pause, seek independent legal advice, and modify the proposal now than to face litigation or government inquiry later. Your vote is your personal acceptance of these risks.

We trust that Councillors will take this submission seriously and act in the best long-term interest of Christchurch by revising the Development Contributions Policy to a lawful, fair state. The future of our city's growth depends on it.

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williamscorporation.com

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Regards,
Blair Chappell
Managing Director
Williams Corporation

Submission #37657

MASTER BUILDERS

Registered Master Builders Association of New Zealand Incorporated

Submission on Christchurch Development contributions rebate schemes consultation

July 2025

Submission #37657

Master Builders submission on the Development contributions rebate schemes consultation

The Registered Master Builders Association (Master Builders) welcomes the opportunity to submit to the Christchurch City Council on *Development contributions rebate schemes consultation.*

About Master Builders

The Master Builders represents over 3,000 commercial and residential builders and are the leading sector advocates on the built environment. Our members have been building the places where New Zealanders live, work, and play, since 1982.

Our sector is a key contributor to the New Zealand economy. For the year ended March 2024, the construction sector contributed 6.2 per cent of the country's real Gross Domestic Product (GDP) accounting to over $17.2 billion[1]. It also employed 294,100 people (or 10 per cent of the country's total workforce) in the year ended September 2024[2].

We are working hard to lead the change our sector needs by ensuring we have the regulatory systems and processes in place to build faster and better. We are supporting our members to grow their capability and business acumen to ensure a strong and healthy sector; to innovate and make the most of new technologies so we meet the climate change challenge; and to attract, train and retain skilled talent. We are proud to be New Zealand's best builders.

At Master Builders we are committed to transforming the sector and rebuilding our economy. We are focused on building better homes, communities and workplaces, and ultimately better lives for all New Zealanders. We want to ensure that the houses that we build now are well-built, accessible, affordable, and appropriate to the needs of our ever-changing society. We are building a better New Zealand.

Our members are supported on the ground by 23 branches across 6 regional hubs:

Branch hub	Serving
Auckland	Auckland, Northland, Coromandel
Midlands	Waikato, Tauranga, Whakatāne, Rotorua, Taupō
Central North Island	Taranaki, Whanganui, Hawke's Bay, Manawatū, Gisborne
Cook Strait	Wellington, Wairarapa, Nelson, Marlborough, West Coast
Canterbury	Canterbury, Ashburton, South Canterbury
Southern	Otago, Central Otago, Gore, Southland

[1] Statistics New Zealand – Infoshare: Gross domestic product – March 2024
[2] Statistics New Zealand – Infoshare: Household Labour Force Suvey – September 2024

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1. Introduction

1.1 Master Builders supports the development contribution rebate schemes. Development rebates can provide incentives to stimulate economic development. However, Development Contribution (DC) charges can significantly affect project viability; using selective rebates to offset these costs is a prudent strategy to catalyse development in line with the city's strategic objectives

1.2 Rebate schemes should be appropriately tailored by individual councils in conjunction with the local development community to better align the Council's expectations with local developer knowledge and likelihood of uptake. We have recommended some changes to the proposed schemes to better ensure uptake from the development community in Christchurch.

2. Recommendations

2.1 At a high level, we recommend that Christchurch City Council:

- Extend Scheme 1 to include vacant sites, thereby incentivising redevelopment of currently empty central city lots;
- Extend the expiry date to a five-year period for Scheme 1 to provide greater certainty and sufficient time for developers to initiate projects;
- Amend Scheme 2 to allow for three or more storey residential buildings to be eligible (rather than the proposed six-storey minimum);
- Extend the expiry date to a five-year period for Scheme 2 to encourage a broader range of high-density projects over a realistic development timeframe;
- Consider a new rebate category (or Scheme) for special-purpose developments by registered charities and non-profit organisations delivering wider community benefits (e.g. supported housing or community facilities by charitable trusts); and
- Engage in good faith with stakeholders managing expiring development contribution credits to facilitate fair solutions and avoid penalising those whose credits are lapsing.

3. Scheme 1: Existing Demand Credits Rebate Scheme (Central City)

3.1 The proposed scheme is for any development with in the Four Avenues of the central city where the existing structure was in place on the lot on or after 1 March 2024. Master Builders are supportive of this proposed application area.

Extension to vacant sites

3.2 Members are also supportive of this scheme including vacant sites. These sites within the central city are equally important to the urban regeneration progress as properties with existing buildings. If development on vacant sites were supported and made more attractive, applicable land within the Four Avenues has the potential to contribute to Christchurch's vibrancy.

3.3 Scheme 1 proposes a funding limit of $5 million, with a maximum of $1 million for a single development. The proposed date that the scheme will expire is on 30 June 2027 or when the total scheme funding is fully allocated. Developments are long term and often take over two years and expiry date of 2027 will realistically only benefit existing development projects in the pipeline.

3.4 As noted in our previous submission, council rates are increasing and that will economically benefit the council from the developed sites. This revenue will be a significant and continuous source of income that should be factored into the funding considerations.

4. Scheme 2: Six-story residential development in the central city rebate scheme

4.1 Master Builders fully supports the Central City High-Density Residential Rebate Scheme and urges its adoption by the Council. This applies within the Four Avenues of the central city and the residential development, or residential component, must comprise of at least six storeys.

4.2 This scheme proposes a 100% rebate of DCs for qualifying multi-unit residential developments of six or more storeys within the central city (inside the Four Avenues), subject to specified scheme limits and covenant requirements.

4.3 We agree with the Council's rationale that this incentive will make the central city a more attractive and feasible location for intensive residential projects.

4.4 Eliminating DC charges for high-rise housing projects in the central city will significantly improves development viability and encourages developers to pursue projects that might otherwise be marginal or uneconomic.

4.5 Master Builders considers the minimum requirement of six storeys is not representative of the current central city landscape. Given the limited demand for buildings of that height, and feasibility concerns, our members recommend a minimum of three storeys instead. This will better encourage a range of housing heights and typologies.

5. Proposed Scheme: Special-Purpose Developments Rebate Scheme

Broadening the Rebate Policy for Community Benefit

5.1 Master Builders applauds the two targeted rebate schemes discussed above but we believe there is an opportunity to broaden the Council's Development Contributions Rebate Policy to ensure greater equity and fairness for developments that deliver exceptionally high social value.

5.2 We propose that the councils consider introducing a special purpose development rebate scheme (or expanding existing rebate criteria) to support "public good" projects undertaken by charitable and non-profit organisations.

5.3 The underlying principle is that developments that provide significant community benefits, even if they do not fit neatly into traditional residential or commercial development categories, should be eligible for DC relief in recognition of those wider benefits. This would extend the sprit of the rebate policy to a class of projects that are currently not covered by the proposed schemes but are equally worthy of assistance.

5.4 Special-purpose developments by charities and community organisations can include facilities such as supported housing for people with disabilities, community centres, healthcare or social service hubs, educational or training facilities for disadvantaged groups, and similar projects that serve a public benefit.

5.5 For instance, a project by a registered charity like Autism NZ to build a centre for autism support services, or a non-profit developing specialised accommodation for people with disabilities, would fall in this category.

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5.6 These types of developments may not generate the same level of commercial profits or large tax revenues but yield large social benefits by addressing critical needs in our community. Master Builders believes that this is both fair and socially responsible for the council to assist such projects the DC rebates consistent with the purpose of supporting community wellbeing.

5.7 Providing DC rebates for charitable developments would be in line with the Council's own policy framework. The Christchurch City Council's Development Contributions Rebate Policy explicitly states that a rebate scheme will be considered when a development confers a "clearly identified benefit to the wider community". Social-purpose builds by charities and non-profits clearly meet this test: they address pressing social needs and improve the well-being of vulnerable populations, thereby benefiting the wider community by reducing social costs and promoting inclusion. It is therefore logical and justified to extend the rebate programme to encompass high public-value developments undertaken by the charitable sector.

5.8 The development itself should be required to provide a public good whether it be housing for disadvantaged groups, facilities for people with disabilities, health or social service centres, or other infrastructure that delivers community support and not be a for-profit venture.

6. Expiry of development contribution credits

6.1 While we broadly support the proposed initiatives, our members have expressed concerns about the expiry of development contribution credits as per the feedback from our previous submission. We would like to see the council engage in good faith with individuals managing the expiration of development contribution credits to facilitate a more appropriate solution.

7. Conclusion

7.1 Master Builders supports the extension of Scheme 1 to include vacant sites as this will help unlock underutilised land within the Four Avenues. However, to increase uptake among developers, Scheme 2 should lower the minimum height requirement to three storeys. This adjustment would better align with the current development landscape and market realities in central Christchurch.

7.2 Master Builders members are the leading constructors in Christchurch and enable some of the largest investments in the city. We wish to thank Christchurch City Council for the opportunity to submit on Christchurch City Council's Development contributions rebate schemes consultation as it gives our members the chance to be heard on a topic that impacts them greatly.

Lachlan Wolfe
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