

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 26/02/2025

First Name: (required) Lovepreet

Last Name: (required) Singh

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Fee for development contributions assessments

1.2.17

What don't you like about our recommended policy position on the Fee for development contributions assessments

we are on basic pays, the inflation is keep rising it is geeting hard to feed the family and evey year council is keep increasing the rates under the name of Development. However no proper budget figures had been shown to public, eg how much money was raised in last financial year and how much has been spent and on what??

Additinally people own tiny houses in city now which does not have proper land and parking. Where it used to be one house there are 8-10 houses and they all are paying rates individually & CCC is still in debt.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

No

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 28/02/2025

First Name: (required) Jacqui

Last Name: (required) Freeman

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Fee for development contributions assessments

Fee for development contributions assessments

You can read more about this on our [Let's Talk](#) page.

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

I don't think it needs to change ... its already incredibly high for someone wanting to put a family flat on their property and it almost skuttled our plans.

1.2.17

What don't you like about our recommended policy position on the Fee for development contributions assessments

I don't like that you take exhorbitant contributions from a neighbourhood and put NOTHING back into that neighbourhood. EG. in Belfast there has been incredible growth in both housing AND industrial area and absolutely NO consideration has been made regarding access through residential area to industrial area and its already causing a nightmare. You have barely done anything regarding infrastructure.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

No

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

Leave it the way it is. It doesn't need to change. What does need to change is how you approve all this new development without any thought about how it will affect the people already living there OR the new people moving in.

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 28/02/2025

First Name: (required) Sophie

Last Name: (required) Morton

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Yes

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 01/03/2025

First Name: (required) ron

Last Name: (required) brooks

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustmentLarge residential unit adjustmentRemission provision

Catchments for Neighbourhood Parks and Road Network activitiesCatchments for Three Waters activities

Stormwater reductions for developer provided infrastructureRemoval of multi-unit adjustment for stormwater

Fee for development contributions assessmentsLand in lieu of cash development contributions

Household unit equivalent (HUE) multipliers update

Small residential unit adjustment

You can read more about this on our Let's Talk page.

1.2.2

What do you like about our recommended policy position on the small residential unit adjustment?

It seems local and national govt. is hell bent on killing off and making sick the population.

rat poison in the water fluoride. proven toxin. gene modification injections mandates. building on prime food producing land and keeping hills unbuildable to look pretty. plying the streets with polluting enormous EMPTY busses everywhere.

yes increase the speed limits from 80k to 100.

dont charge for the water and keep it pure of chlorine.

1.2.3

What don't you like about our recommended policy position on the small residential unit adjustment?

It seems local and national govt. is hell bent on killing off and making sick the population.

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Large residential unit adjustment

You can read more about this on our [Let's Talk page](#).

1.2.4

What do you like about our recommended policy position on the large residential unit adjustment?

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1.2.5

What don't you like about our recommended policy position on the large residential unit adjustment?

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Remission provision

You can read more about this on our [Let's Talk page](#).

1.2.6

What do you like about our recommended policy position on the remission provision?

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Catchments for Neighbourhood Parks Road Network activities

You can read more about this on our [Let's Talk page](#).

1.2.8

What do you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

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Catchments for Three Waters activities

You can read more about this on our [Let's Talk page](#).

1.2.10

What do you like about our recommended policy position on the Catchments for Three Waters activities?

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Stormwater reductions for developer provided infrastructure

You can read more about this on our [Let's Talk page](#).

1.2.12

What do you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

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Removal of multi-unit adjustment for stormwater

You can read more about this on our [Let's Talk](#) page.

1.2.14

What do you like about our recommended policy position on the Removal of multi-unit adjustment for stormwater?

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1.2.15

What don't you like about our recommended policy position on the Removal of multi-unit adjustment for stormwater?

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 yes increase the speed limits from 80k to 100.
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Fee for development contributions assessments

You can read more about this on our [Let's Talk](#) page.

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

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 yes increase the speed limits from 80k to 100.
 dont charge for the water and keep it pure of chlorine.

Land in lieu of cash development contributions

You can read more about this on our [Let's Talk](#) page.

1.2.18

What do you like about our recommended policy position on the Land in lieu of cash development contributions?

It seems local and national govt. is hell bent on killing off and making sick the population.
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1.2.19

What don't you like about our recommended policy position on the Land in lieu of cash development contributions?

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 yes increase the speed limits from 80k to 100.
 dont charge for the water and keep it pure of chlorine.

Household unit equivalent (HUE) multipliers update

You can read more about this on our [Let's Talk page](#).

1.2.20

What do you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

It seems local and national govt. is hell bent on killing off and making sick the population.
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 keeping hills unbuildable to look pretty. plying the streets with polluting enormous EMPTY busses everywhere.
 yes increase the speed limits from 80k to 100.
 dont charge for the water and keep it pure of chlorine.

1.2.21

What don't you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

It seems local and national govt. is hell bent on killing off and making sick the population.
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 keeping hills unbuildable to look pretty. plying the streets with polluting enormous EMPTY busses everywhere.
 yes increase the speed limits from 80k to 100.
 dont charge for the water and keep it pure of chlorine.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Don't know / not sure

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

It seems local and national govt. is hell bent on killing off and making sick the population.
 rat poison in the water fluoride. proven toxin. gene modification injections mandates. building on prime food producing land and
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 yes increase the speed limits from 80k to 100.
 dont charge for the water and keep it pure of chlorine.

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 02/03/2025

First Name: (required) Kathleen

Last Name: (required) Crisley

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Don't know / not sure

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

Please refer to attachment

Attached Documents

Name	
CCC Development consultation	

2 March 2025

Christchurch City Council

As a long-term resident of Christchurch, I feel that we have paid sufficiently every year for the provision of our infrastructure. New developments are exacerbators, particularly with multi-unit dwellings. Consider that a single unit family dwelling on a site may have had a maximum of 6 residents – 2 parents and 4 children (many will have had less than this number – as the average family size is 2 parents/2 children).

Now, there are 4 units on the site. Each will have a laundry and kitchen and most will have 2 occupants. That is 8 people contributing effluent to the wastewater system and a 25% increase in water demand.

Please stop using loyal residents as an endless source of finance and expect us to subsidise “low cost housing.” Ensure that all councillors with development ties (Gough, Mauger and others) are not allowed to vote on this plan change.

Adopt Option (C) Do not provide any adjustment and charge all residential units 1 HUE.

In addition, 10 years is sufficient for development credits. There is no compelling argument to extend these to anyone.

Adopt (A) Retain the current policy setting

Kind regards,

Kathleen Crisley

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 03/03/2025

First Name: (required) GABRIELLA

Last Name: (required) KENNEDY

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustment

Small residential unit adjustment

You can read more about this on our [Let's Talk](#) page.

1.2.2

What do you like about our recommended policy position on the small residential unit adjustment?

Option B - adjustment for one bedroom units

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Don't know / not sure

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 08/03/2025

First Name: (required) michael

Last Name: (required) thorley

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustmentLarge residential unit adjustmentRemission provision

Catchments for Neighbourhood Parks and Road Network activitiesCatchments for Three Waters activities

Stormwater reductions for developer provided infrastructureRemoval of multi-unit adjustment for stormwater

Fee for development contributions assessmentsLand in lieu of cash development contributions

Household unit equivalent (HUE) multipliers update

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Don't know / not sure

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 09/03/2025

First Name: (required) Graham

Last Name: (required) Wagener

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustment Large residential unit adjustment Remission provision

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Removal of multi-unit adjustment for stormwater Fee for development contributions assessments

Land in lieu of cash development contributions Household unit equivalent (HUE) multipliers update

Small residential unit adjustment

You can read more about this on our [Let's Talk page](#).

1.2.2

What do you like about our recommended policy position on the small residential unit adjustment?

It seems like a good balance.

1.2.5

What don't you like about our recommended policy position on the large residential unit adjustment?

Should an additional 0.4 HUE for each bedroom beyond the 7th be added too?

Remission provision

You can read more about this on our [Let's Talk page](#).

1.2.6

What do you like about our recommended policy position on the remission provision?

Removing the provision completely will decrease the amount of council time spent of paperwork that would likely be declined.

1.2.9

What don't you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

There seems to be a big gap along Marshlands Road for the active travel and public transit catchment.

Stormwater reductions for developer provided infrastructure

You can read more about this on our [Let's Talk page](#).

1.2.12

What do you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

Developers pay a fair share.

Removal of multi-unit adjustment for stormwater

You can read more about this on our [Let's Talk page](#).

1.2.14

What do you like about our recommended policy position on the Removal of multi-unit adjustment for stormwater?

Intensification in infill areas leaves a sad amount of the land as ISA so it makes no sense that that sort of development would get a discount.

Fee for development contributions assessments

You can read more about this on our [Let's Talk page](#).

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

The fairness.

1.2.17

What don't you like about our recommended policy position on the Fee for development contributions assessments

That it only will recover a portion of the cost.

Land in lieu of cash development contributions

You can read more about this on our [Let's Talk page](#).

1.2.18

What do you like about our recommended policy position on the Land in lieu of cash development contributions?

Simplification, especially as it's being used less.

Household unit equivalent (HUE) multipliers update

You can read more about this on our Let's Talk page.

1.2.20

What do you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

It makes sense to use activity based assessment.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Yes

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

There should be developer contributions towards canopy cover to address the urban heat island. Discounts could be given if they provide significant canopy cover (maybe current, maybe potential) on the development site.

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 19/03/2025

First Name: (required) Arun

Last Name: (required) Kumar

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

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Land in lieu of cash development contributions

Land in lieu of cash development contributions

You can read more about this on our [Let's Talk](#) page.

1.2.18

What do you like about our recommended policy position on the Land in lieu of cash development contributions?

its too expensive

1.2.19

What don't you like about our recommended policy position on the Land in lieu of cash development contributions?

Dont do it

2.1

Overall, do you support the Development Contributions Policy Review?

Required

No

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 19/03/2025

First Name: (required) Albert

Last Name: (required) Tieu

Name of Organisation/business:

Ensure you have the authority to submit

Williams Corporation

Your role: (required) Client Consultant

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

2.1

Overall, do you support the Development Contributions Policy Review?

Required

No

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 19/03/2025

First Name: (required) Geoffrey

Last Name: (required) Butcher

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

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Fee for development contributions assessments Land in lieu of cash development contributions

Household unit equivalent (HUE) multipliers update

Small residential unit adjustment

You can read more about this on our [Let's Talk page](#).

1.2.2

What do you like about our recommended policy position on the small residential unit adjustment?

I agree with the arguments by council staff in favour of the change.

1.2.5

What don't you like about our recommended policy position on the large residential unit adjustment?

While I agree with the general argument, I think the trigger point should be reduced to 4 or 5 bedrooms

Remission provision

You can read more about this on our [Let's Talk page](#).

1.2.6

What do you like about our recommended policy position on the remission provision?

I'd be happy to see this go. The old policy application always seemed rather arbitrary anyway, and developers are / were full of bullshit as to why they should be favoured. Also, it left a lot of discretion to officials.

Catchments for Neighbourhood Parks Road Network activities

You can read more about this on our [Let's Talk page](#).

1.2.8

What do you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

I have no strong view on this, but in general I agree with charges reflecting local conditions.

1.2.11

What don't you like about our recommended policy position on the Catchments for Three Waters activities?

Not so keen on this. There IS still in-fill occurring (e.g Lyttelton), and if the costs of providing for in-fill are lower than for green-fields, then the in-fill DCs should reflect this. In general I like fine-grained allocation of costs to the extent that this is reasonable.

Stormwater reductions for developer provided infrastructure

You can read more about this on our [Let's Talk page](#).

1.2.12

What do you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

In principle I agree with on-site stormwater containment being eligible for a reduction in DCs,

Removal of multi-unit adjustment for stormwater

You can read more about this on our [Let's Talk page](#).

1.2.14

What do you like about our recommended policy position on the Removal of multi-unit adjustment for stormwater?

I completely agree with council arguments for the proposed change. Needs to reflect impermeable area rather than number of units.

Fee for development contributions assessments

You can read more about this on our [Let's Talk page](#).

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

I support this. Somebody has to pay and it seems better that this be developers rather than general ratepayers

1.2.19

What don't you like about our recommended policy position on the Land in lieu of cash development contributions?

Where it is to the advantage of council and the developer that a piece of land be transferred, then I think agreeing on a financial value, making an offset, and transferring the land as part of the allocation of titles as completion of the subdivision will be less expensive than having a lawyer involved in a sale and purchase agreement. I accept the council staff argument that an offset creates work for staff, but this work is probably related to deciding on whether the land is of value to council, and if so how valuable. That work will be the same whether the offset is against the DC or via a separate transaction in the form of a Sale and Purchase agreement.

Household unit equivalent (HUE) multipliers update

You can read more about this on our [Let's Talk](#) page.

1.2.20

What do you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

I agree with the council staff position on this.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Yes

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 20/03/2025

First Name: (required) Rebecca

Last Name: (required) Parish

Name of Organisation/business:

Ensure you have the authority to submit Foodstuffs South Island

Your role: (required) Head of Property Strategy

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

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Remission provision Stormwater reductions for developer provided infrastructure Fee for development contributions assessments

Remission provision

You can read more about this on our [Let's Talk](#) page.

1.2.6

What do you like about our recommended policy position on the remission provision?

Unflexible and not reflective of a modern assessment approach.

1.2.7

What don't you like about our recommended policy position on the remission provision?

Please retain the existing policy as this provides for discretion and flexibility in assessment. The proposed policy position is authoritarian rather than pragmatic and progressive.

Stormwater reductions for developer provided infrastructure

You can read more about this on our [Let's Talk](#) page.

1.2.12

What do you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

Provides flexibility in design to ensure site development best suits the surrounding environment.

Fee for development contributions assessments

You can read more about this on our [Let's Talk page](#).

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

N/A - Council should not be charging a fee for assessments, this is similar to charging for invoicing administration.

1.2.17

What don't you like about our recommended policy position on the Fee for development contributions assessments

Fee assessment should be fee-less to encourage developers to communicate with the Development Contribution Team.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

No

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 21/03/2025

First Name: (required) Paul

Last Name: (required) McMahon

Name of Organisation/business:

Ensure you have the authority to submit

Waitai Coasta-Burwood-Linwood Community Board

Your role: (required) Chairperson

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustmentLarge residential unit adjustmentRemission provision

Catchments for Neighbourhood Parks and Road Network activitiesCatchments for Three Waters activities

Stormwater reductions for developer provided infrastructureRemoval of multi-unit adjustment for stormwater

Fee for development contributions assessmentsLand in lieu of cash development contributions

Household unit equivalent (HUE) multipliers update

Small residential unit adjustment

You can read more about this on our [Let's Talk page](#).

1.2.2

What do you like about our recommended policy position on the small residential unit adjustment?

Not applicable – please see final comments.

1.2.3

What don't you like about our recommended policy position on the small residential unit adjustment?

Not applicable – please see final comments.

Large residential unit adjustment

You can read more about this on our [Let's Talk page](#).

1.2.4

What do you like about our recommended policy position on the large residential unit adjustment?

Not applicable – please see final comments.

1.2.5

What don't you like about our recommended policy position on the large residential unit adjustment?

Not applicable – please see final comments.

Remission provision

You can read more about this on our [Let's Talk page](#).

1.2.6

What do you like about our recommended policy position on the remission provision?

Not applicable – please see final comments.

1.2.7

What don't you like about our recommended policy position on the remission provision?

Not applicable – please see final comments.

Catchments for Neighbourhood Parks Road Network activities

You can read more about this on our [Let's Talk page](#).

1.2.8

What do you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

Not applicable – please see final comments.

1.2.9

What don't you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

Not applicable – please see final comments.

Catchments for Three Waters activities

You can read more about this on our [Let's Talk page](#).

1.2.10

What do you like about our recommended policy position on the Catchments for Three Waters activities?

Not applicable – please see final comments.

1.2.11

What don't you like about our recommended policy position on the Catchments for Three Waters activities?

Not applicable – please see final comments.

Stormwater reductions for developer provided infrastructure

[You can read more about this on our Let's Talk page.](#)

1.2.12

What do you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

Not applicable – please see final comments.

1.2.13

What don't you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

Not applicable – please see final comments.

Removal of multi-unit adjustment for stormwater

[You can read more about this on our Let's Talk page.](#)

1.2.14

What do you like about our recommended policy position on the Removal of multi-unit adjustment for stormwater?

Not applicable – please see final comments.

1.2.15

What don't you like about our recommended policy position on the Removal of multi-unit adjustment for stormwater?

Not applicable – please see final comments.

Fee for development contributions assessments

[You can read more about this on our Let's Talk page.](#)

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

Not applicable – please see final comments.

1.2.17

What don't you like about our recommended policy position on the Fee for development contributions assessments?

Not applicable – please see final comments.

Land in lieu of cash development contributions

You can read more about this on our [Let's Talk page](#).

1.2.18

What do you like about our recommended policy position on the Land in lieu of cash development contributions?

Not applicable – please see final comments.

1.2.19

What don't you like about our recommended policy position on the Land in lieu of cash development contributions?

Not applicable – please see final comments.

Household unit equivalent (HUE) multipliers update

You can read more about this on our [Let's Talk page](#).

1.2.20

What do you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

Not applicable – please see final comments.

1.2.21

What don't you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

Not applicable – please see final comments.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Somewhat

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

1. The Board believes that growth should pay for growth;
2. The Board believes that easy access to libraries, parks, and pools are essential for every community and that Development Contributions should reflect this;
3. The Board believes that ratepayers should not effectively subsidise luxury developments; and,
4. That subsidies, if any, should be reserved for affordable housing.

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 21/03/2025

First Name: (required) Richard

Last Name: (required) Peebles

Name of Organisation/business:

Ensure you have the authority to submit Peebles Group Ltd

Your role: (required) CEO

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustment Large residential unit adjustment Remission provision

Catchments for Neighbourhood Parks and Road Network activities Catchments for Three Waters activities

Stormwater reductions for developer provided infrastructure Removal of multi-unit adjustment for stormwater

Fee for development contributions assessments Land in lieu of cash development contributions

Household unit equivalent (HUE) multipliers update

Small residential unit adjustment

You can read more about this on our [Let's Talk page](#).

1.2.2

What do you like about our recommended policy position on the small residential unit adjustment?

Not Much other than you should have one. Adjustment is inadequate. A small two bedroom unit of 70m2 approx would be paying \$30K approx in the CBD, equivalent to 5-7% of its value. Excessive. Should be no DC in CBD

1.2.3

What don't you like about our recommended policy position on the small residential unit adjustment?

Small unit adjustment should be less than 100m2 or similar otherwise it pebalises intensification and becomes too large a portion

of the cost of the unit and raises prices significantly. Likely making the more intensive developments uneconomic.

Large residential unit adjustment

You can read more about this on our [Let's Talk page](#).

1.2.4

What do you like about our recommended policy position on the large residential unit adjustment?

Nothing

1.2.5

What don't you like about our recommended policy position on the large residential unit adjustment?

Its arbitrary figure that means an increase in 1 bedroom increases DC payment by 40%. If 6 beds is 1 hue, how can 7 be 1.4? The extra bedroom has not increased demand by 40%. Likely not in line with requirement for extra demand being catalyst for liability for DC.

Remission provision

You can read more about this on our [Let's Talk page](#).

1.2.6

What do you like about our recommended policy position on the remission provision?

I couldn't find reference to remissions in policy, only rebates and not charging DCs for Maori Land

1.2.7

What don't you like about our recommended policy position on the remission provision?

The policy is vague. Says CCC may consider rebates but not why and what constitutes a development that is eligible. Non charging DCs for Maori Land seems a purely race based policy without identifying what developments meet criteria and which puts cost on ratepayers and other developers.

Catchments for Neighbourhood Parks Road Network activities

You can read more about this on our [Let's Talk page](#).

1.2.8

What do you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

TBA

1.2.9

What don't you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

TNC

Catchments for Three Waters activities

You can read more about this on our [Let's Talk page](#).

1.2.10

What do you like about our recommended policy position on the Catchments for Three Waters activities?

TBC

1.2.11

What don't you like about our recommended policy position on the Catchments for Three Waters activities?

TBC

Stormwater reductions for developer provided infrastructure

[You can read more about this on our Let's Talk page.](#)

1.2.12

What do you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

Seems logical that if developer pays for infrastructure they should not pay again. Question if its even legal to actually charge twice anyway.

1.2.13

What don't you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

as above

Removal of multi-unit adjustment for stormwater

[You can read more about this on our Let's Talk page.](#)

1.2.14

What do you like about our recommended policy position on the Removal of multi-unit adjustment for stormwater?

TBC

1.2.15

What don't you like about our recommended policy position on the Removal of multi-unit adjustment for stormwater?

TBC

Fee for development contributions assessments

[You can read more about this on our Let's Talk page.](#)

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

Fees increases are huge and will have negative effects on numbers of developments and affordability, especially in the lower value areas.

1.2.17

What don't you like about our recommended policy position on the Fee for development contributions assessments

Fees increases are huge and will have negative effects on numbers of developments and affordability, especially in the lower value areas.

Land in lieu of cash development contributions

You can read more about this on our Let's Talk page.

1.2.18

What do you like about our recommended policy position on the Land in lieu of cash development contributions?

Seems logical

1.2.19

What don't you like about our recommended policy position on the Land in lieu of cash development contributions?

TBC

Household unit equivalent (HUE) multipliers update

You can read more about this on our Let's Talk page.

1.2.20

What do you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

TBC

1.2.21

What don't you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

TBC

2.1

Overall, do you support the Development Contributions Policy Review?

Required

No

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

Huge increases which seem unjustified and will have huge ramifications on developments, housing supply and affordability.

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 21/03/2025

First Name: (required) Rick

Last Name: (required) Hill

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Fee for development contributions assessments

Fee for development contributions assessments

You can read more about this on our [Let's Talk](#) page.

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

I think the big point that is missed is that its not the developers that benefit from the infrastructure but the householders and they already pay a lot, too much for that same thing

1.2.17

What don't you like about our recommended policy position on the Fee for development contributions assessments

See above

2.1

Overall, do you support the Development Contributions Policy Review?

Required

No

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 22/03/2025

First Name: (required) Andrew

Last Name: (required) Evans

Name of Organisation/business:

Ensure you have the authority to submit A E Architects Ltd

Your role: (required) director

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustment Large residential unit adjustment Stormwater reductions for developer provided infrastructure

Small residential unit adjustment

You can read more about this on our [Let's Talk](#) page.

1.2.2

What do you like about our recommended policy position on the small residential unit adjustment?

the amount of discount for 1 bedrooms of 0.6 hUE is correct

1.2.3

What don't you like about our recommended policy position on the small residential unit adjustment?

lets talk about fairness, i designed the small unit policy back in 2006, it was and still is designed to make the HUE less blunt recently i noticed the policy had got to loose and the discounts too big but what CCC proposes is an over reaction, merely only giving a discount to 1 bedroom units is just not right.

I agree a 0.6 HUE for 1 bedrooms is correct and sensible **BUT** there must still be a discount for 2 bedroom and on AVERAGE occupancy it must 0.8HUE- this is based on an AVERAGE 2 bedroom having 1.9 occupants and an average HUE of 2.4 (sadly ive been unable to get latest 2023 average occupancy per bedroom size from stat NZ so im basing on my memory of 2018 stats), CCC argument that the discount/ difference is not big and therefore not done is entirely wiped out by their argument units with 6 bedrooms or more should pay 10% more!

In order to make sure developers dont try and game the system by calling bedrooms living rooms i would lay down ground rules (otherwise developers will say my 2 bedroom unit is only 1 bedroom because the other space is a study or a store room)

1) the discount should be recorded and stored in council records (maybe even on the LIM PIm) & a warning on PIM/LIM if spaces get used as bedrooms the council can charge what the discount was eg: soemoen uses a garage as a bedroom they get sent a bill, this applies to 1 or 2 bedroom units

2) any space bigger than 6sqm net is considered a bedroom excluding an obvious garage & 1 living room (note- 1 living room is only for 1 & 2 bedroom units- see my commentary on big units). 6sqm is the legal definition from 1947 of a minimum size of a bedroom

see <https://www.legislation.govt.nz/regulation/public/1947/0200/latest/whole.html>

3) a max square metre area could also be used as a test, but that can be a bit unfair as a generous 2 bed unit with garage can easily be bigger than a small 3 unit without a garage

Note studios should be included in 1 bedroom definition

The policy document should emphasise average use: a 3 bedroom house may only have one occupant, a 1 bed might have 2 BUT on average and over time the average will likely still be 1.5 and 2.3 respectively , it should also emphasise a rough correlation between occupancy and service used - it is obvious that a 1 person household will put less pressure on CCC services than a 6 person household, yet a blunt HUE does not reflect that which is why a discount is needed

Large residential unit adjustment

You can read more about this on our [Let's Talk page](#).

1.2.4

What do you like about our recommended policy position on the large residential unit adjustment?

i agree this is the right thing to do, and 1.4 HUE is probably about right

1.2.5

What don't you like about our recommended policy position on the large residential unit adjustment?

the policy docs are not clear- is it 7 or more bedrooms or 6 or more bedrooms?

For these big units they will often have 2 living rooms- there needs to be a test to make sure developers dont get hit for an extra bedroom when clearly the place has 2 living rooms (i have done several 5 bedroom places with 2 living rooms)

Stormwater reductions for developer provided infrastructure

You can read more about this on our [Let's Talk](#) page.

1.2.12

What do you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

nothing, retain current system

1.2.13

What don't you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

this is lazy lazy thinking (or is it grasping?) & discourages density : stormwater demand is one that can be easily measured by the impervious area, which designers need to provide if you have 12 stacked apartments with 300sqm roof area paying 12x HUE compared to a 300sqm single story house paying 1 HUE and you think thats reasonable you need your head examined, leave the policy as is

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Somewhat

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 22/03/2025

First Name: (required) Nicholas

Last Name: (required) Latham

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustment Large residential unit adjustment Remission provision Catchments for Three Waters activities
 Stormwater reductions for developer provided infrastructure Removal of multi-unit adjustment for stormwater
 Fee for development contributions assessments Land in lieu of cash development contributions
 Household unit equivalent (HUE) multipliers update

Small residential unit adjustment

You can read more about this on our [Let's Talk page](#).

1.2.2

What do you like about our recommended policy position on the small residential unit adjustment?

This is a good idea and the recommended option should be implemented.

Large residential unit adjustment

You can read more about this on our [Let's Talk page](#).

1.2.4

What do you like about our recommended policy position on the large residential unit adjustment?

Agree with the recommended option.

Remission provision

[You can read more about this on our Let's Talk page.](#)

1.2.6

What do you like about our recommended policy position on the remission provision?

Agree with the recommended option.

Catchments for Three Waters activities

[You can read more about this on our Let's Talk page.](#)

1.2.10

What do you like about our recommended policy position on the Catchments for Three Waters activities?

Agree with recommended option.

Stormwater reductions for developer provided infrastructure

[You can read more about this on our Let's Talk page.](#)

1.2.12

What do you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

Agree with recommended option.

Removal of multi-unit adjustment for stormwater

[You can read more about this on our Let's Talk page.](#)

1.2.14

What do you like about our recommended policy position on the Removal of multi-unit adjustment for stormwater?

Agree with recommended option.

Fee for development contributions assessments

[You can read more about this on our Let's Talk page.](#)

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

Agree with recommended option.

Land in lieu of cash development contributions

[You can read more about this on our Let's Talk page.](#)

1.2.18

What do you like about our recommended policy position on the Land in lieu of cash development contributions?

Agree with recommended option.

Household unit equivalent (HUE) multipliers update

You can read more about this on our [Let's Talk](#) page.

1.2.20

What do you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

Agree with recommended option.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Yes

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 23/03/2025

First Name: (required) Connor

Last Name: (required) McIver

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Yes

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

I support all proposed changes for the reasons provided. These changes appear well-considered and fair.

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 24/03/2025

First Name: (required) Deb

Last Name: (required) Clarke

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustment Large residential unit adjustment Remission provision

Catchments for Neighbourhood Parks and Road Network activities Catchments for Three Waters activities

Stormwater reductions for developer provided infrastructure Removal of multi-unit adjustment for stormwater

Fee for development contributions assessments Land in lieu of cash development contributions

Household unit equivalent (HUE) multipliers update

Small residential unit adjustment

You can read more about this on our [Let's Talk page](#).

1.2.2

What do you like about our recommended policy position on the small residential unit adjustment?

I would like to see Option B adopted by Council as it appears to be the most financially feasible option and appears to be the fairest way to charge.

Large residential unit adjustment

You can read more about this on our [Let's Talk page](#).

1.2.4

What do you like about our recommended policy position on the large residential unit adjustment?

I am in support of Option B the larger the house that is built the higher the DC should be as all larger buildings are going to place a heavier demand on our infrastructure

Remission provision

You can read more about this on our [Let's Talk page](#).

1.2.6

What do you like about our recommended policy position on the remission provision?

I am in support of C as it appears to address issues of concerns.

1.2.7

What don't you like about our recommended policy position on the remission provision?

This one could be hard to manage if changes are made however Developers would still be able to apply under the LGA 2002

Catchments for Neighbourhood Parks Road Network activities

You can read more about this on our [Let's Talk page](#).

1.2.8

What do you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

I am in support of option A as it works in with the LTP and appears to be the best option of the 2 for residents and for Christchurch Urban Plan along with Traffic Strategic Plans

Catchments for Three Waters activities

You can read more about this on our [Let's Talk page](#).

1.2.10

What do you like about our recommended policy position on the Catchments for Three Waters activities?

I am in support of Option A as the City grows so does the need for infrastructure especially in regard to PC14 and medium-density housing. The City needs to be able to keep up with the demand on the infrastructure.

We are now 14 years post-earthquake and we are in a position of almost being back to where we used to be providing we keep working on the infrastructure. We need to look at all our options and do it right the first time. This policy needs to be fair and reasonable and also align with the Local Water Done Well Policy which is currently being submitted on.

Stormwater reductions for developer provided infrastructure

You can read more about this on our [Let's Talk page](#).

1.2.12

What do you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

I would prefer to see option B in place. If the Developers are choosing to go large and where this is likely to put extreme pressure and demand on Council Infrastructure, then the Developers should meet this cost or perhaps look at building smaller units.

Removal of multi-unit adjustment for stormwater

You can read more about this on our [Let's Talk page](#).

1.2.14

What do you like about our recommended policy position on the Removal of multi-unit adjustment for stormwater?

I am in support of Option A and removing the multi uni adjustment for the stormwater seeing as there is no alternate rationale in support of Option B

Fee for development contributions assessments

You can read more about this on our [Let's Talk page](#).

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

I am fully in support of Option A Developers should be charged an assessment fee providing it is fair and reasonable - this needs to be paid by the developers as ratepayers should not be expected to pay for housing intensification in their rates along with everything else.

Land in lieu of cash development contributions

You can read more about this on our [Let's Talk page](#).

1.2.18

What do you like about our recommended policy position on the Land in lieu of cash development contributions?

I am in full support of Option A - this process needs to be open and transparent especially when it obtains to the sale and purchase of land.

Household unit equivalent (HUE) multipliers update

You can read more about this on our [Let's Talk page](#).

1.2.20

What do you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

I am in full support of Option A especially if all local councils are adhering to this way. Its needs to be a standardised approach nationwide

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Yes

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

Please do not increase rates further. This Policy needs to have Developers paying their own DC completely as it is unfair to Canterbury Ratepayers to expect them to foot another price hike in their rates again.

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 25/03/2025

First Name: (required) Emma

Last Name: (required) Norrish

Name of Organisation/business:

Ensure you have the authority to submit

Waipapa Papanui-Innes-Central Community Board

Your role: (required) Chairperson

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Yes

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 25/03/2025

First Name: (required) Natalie

Last Name: (required) Keane

Name of Organisation/business:

Ensure you have the authority to submit Kāinga Maha

Your role: (required) Development Associate

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Somewhat

Attached Documents

Name
250326 CCC DC Consultation - Kainga Maha response 

KĀINGA MAHA



Christchurch City Council Development Contributions Policy Review

Kāinga Maha Consultation Response

26 March 2025

KĀINGA MAHA

1. Introduction

Kāinga Maha is a for-purpose property developer dedicated to delivering high-quality, affordable housing across Aotearoa New Zealand. We not only develop homes but also create thriving, inclusive communities. Our place-based approach enables a spectrum of housing solutions, including first-home ownership, progressive homeownership models, affordable rentals, and community housing. These developments strengthen communities by fostering stability, economic resilience, and long-term social well-being.

On all our projects, we work closely with our partners, stakeholders, and the local community to ensure that the right homes are built in the right locations. As an affordable housing developer, we understand both the commercial realities of development and the critical need to balance financial viability with strong social outcomes—without compromising quality or our core mission. Unlike conventional developers, we prioritise affordability and delivering social value over financial return, such as enabling homeownership for first-time buyers, supporting long-term stable tenancies, and fostering resilient communities through integrated affordable and community housing solutions, choosing to operate on reduced margins to maximise social outcomes.

Kāinga Maha is wholly owned by Home Foundation Charitable Trust. Any surplus that is made is re-purposed into the charitable trust, ensuring that funds are reinvested into advancing our charitable purpose.

The Home Foundation's charitable purpose is centred around enabling human flourishing by ensuring everyone has access to an affordable, healthy, and secure home. This mission is driven by the belief that a home is more than just a physical structure; it is a place of safety, security, good health, community, and belonging. The foundation's work is guided by several strategic pillars, including research, construction and development, housing efficiency, and innovation.

The Home Foundation operates through a unique ecosystem. It includes Kāinga Maha (development arm), Home Capital Partners (impact investment arm), and Home Construction (house building arm). These entities collaborate to provide affordable, sustainable housing solutions across Aotearoa, New Zealand. The foundation partners with councils, Crown agencies, community housing providers, impact investors, and philanthropic donors to create sustainable, inclusive, and resilient communities.

2. Feedback on the Proposed Increase to Development Contributions

2.1. Impact on Affordable Housing Development:

The proposed increase in development contributions (DCs) presents a major challenge to the financial feasibility of affordable housing projects. Unlike traditional developers who typically target higher profit margins (generally in the range of 15%-20%) and pass increased costs onto buyers, we operate on slim margins, in light of the mixed-tenure housing outcomes we seek to unlock, to enable the homes we develop to be sold at affordable price-points and to ensure we maximise the broader outcomes (environmental, social and economic) outcomes realised.

Higher development contributions will result in several critical consequences for affordable housing:

1. **Increased housing costs for buyers** – Additional development costs could raise the final sale price, putting homeownership further out of reach for low- and middle-income families. This increase directly undermines the Council's housing affordability objectives outlined in the Community Housing Strategy 2021-2031¹, which highlights the importance of affordable housing as key piece of social infrastructure, essential for positive health, economic, environmental, and social outcomes.
2. **Fewer Affordable Housing Projects** – Many affordable projects operate on tight margins, and higher upfront costs could render them unfeasible. While we choose to accept a reduced return in lieu of social and affordable housing outcomes, we must still ensure projects remain commercially viable. Further reductions in returns also limit our ability to recycle capital into future developments or capacity to cross-subsidise the provision of affordable/social housing on mixed tenure developments, whereby the development surpluses generated from market sale/rental housing can, in part, cross-subsidise the affordable/social housing. Any increase to the DCs puts at risk the new supply of affordable/social housing, especially in the current environment where there is limited/if any government/Crown capital subsidies to enable the development of new affordable/social housing. Please also refer to our hypothetical case study in section 2.2.

¹ (CCC Community Housing Strategy 2021-2031, n.d.)

KĀINGA MAHA

3. **Reduced Housing Supply** – The flipside of increased costs is also a reduced supply of more housing in general, given the adverse impact on development viability at a time where in many parts of Christchurch the difference between realisable values and development costs are negligible leading to further erosion of any development margin. If developers stop building due to cost pressures, the overall supply of housing will drop, leading to increased house prices citywide. If an existing house is available at a lower cost than a newly built home, prospective buyers are more likely to purchase the existing home instead. This will reduce the rate of new home purchases, making developers less willing to take financial risks if their product is unlikely to sell. Ultimately, this adds to a shortage of housing supply. This contradicts the Community Housing Strategy 2021-2031², which highlights the need for stronger policies to expand the supply of community and affordable housing.

4. **Contradiction of Council's Own Strategic Policy** – The proposed increase in DCs puts in jeopardy the delivery of the Council's own strategic vision and priorities as detailed in the Council's Strategic Framework underpinning Christchurch City Council's Long-Term Plan, in particular:
 - The vision for Ōtautahi Christchurch to be a place of opportunity for all³...open to new ideas, new people, new investment and new ways of doing things – a place where anything is possible.
 - to be an inclusive and equitable city;⁴
 - The Council's target to maintain at least 2,080 community housing homes⁵
 - enabling the provision of diverse and affordable housing options, including affordable, community, social housing, and papakāinga.⁶

² (CCC Community Housing Strategy 2021-2031, n.d.)

³ (CCC Long Term Plan 2024-2034, n.d., p. 68)

⁴ (CCC Long Term Plan 2024-2034, n.d., p. 20)

⁵ (CCC Long Term Plan 2024-2034, n.d., p. 135)

⁶ (CCC Long Term Plan 2024-2034, n.d., p. 7)

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2.2. Impact on Development Viability

To illustrate the detrimental impact of the proposed increase in DCs on development viability and the new supply of affordable or social housing, we undertook a high-level development viability assessment based on a hypothetical project in the Christchurch Central Catchment. This development is assumed to comprise of 11 homes—8x two-bedroom units and 3x three-bedroom units—aimed at first home buyers on a modest income.

Under the current DC rate of \$8,126.76 per Household Unit Equivalent (HUE), the total development cost for these contributions would be approximately \$89,000. In contrast, the proposed DC rate of \$29,562.70 per HUE pushes the total closer to \$325,000, causing overall development costs to rise from \$5.84 million to \$6.11 million⁷.

Cost	Current Development Contributions	Proposed Development Contributions
Land bidding, Due Diligence and Acquisition	\$1,000,000	\$1,000,000
DCs	\$89,000	\$325,000
Council Fees	\$110,000	\$110,000
Professional Fees (10% of total costs)	\$560,000	\$560,000
Civils build costs	\$570,000	\$570,000
Vertical construction build costs	\$2,745,000	\$2,745,000
Sales and marketing fees (2% Development Value)	\$150,000	\$150,000
Contingency (10% of total costs excl. finance)	\$523,000	\$546,000
Finance (6.7% cost of capital)	\$94,000	\$100,000
Total	\$5,842,000	\$6,106,000

It has been assumed that the two-bedrooms are able to be sold for a market value of \$615,000 incl. GST and the three-bedrooms are able to be sold for \$675,000 incl. GST (in today's dollars). After accounting for the time taken to complete the homes (assumed to be 1.5 years from land acquisition to issuance of Code of Compliance) and assuming 5% house price escalation per annum, the homes could be worth \$662,000 incl. GST and \$726,000 incl. GST respectively. This results in total gross revenue of \$7.47m. After accounting for GST this drops to \$6.50m.

⁷ [DC charges - 2016_2021_and_2025.pdf](#)

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Revenue	Estimated value in 1.5 years' time	Number of homes	Total revenue
Two-bedroom	\$662,000 incl. GST	8	\$5,296,000 incl. GST
Three-bedroom	\$726,000 incl. GST	3	\$2,178,000 incl. GST
Total		11	\$7,474,000 incl. GST
Less GST			-\$974,869
Grand total revenue			\$6,500,000

Assuming projected market sales revenue remains unchanged at \$6.50 million, the cost increase due to increased DC's reduces the project's profit from \$658,000 (an 11.3% margin) to \$394,000 (a 6.5% margin), as detailed in the following development financial summary table:

Allowance	Current Development Contributions	Proposed Development Contributions
Estimated Gross Development Revenue (GDV)	\$6,500,000	\$6,500,000
Estimated Gross Development Costs (GDC)	\$5,842,000	\$6,106,000
Profit (GDV – GDC)	\$658,000	\$394,000
Profit on cost (%)	11.3%	6.5%

Absorbing the additional DC expense erodes already-narrow development margins, making affordable housing projects riskier and less financially viable. Alternatively, if a developer were to maintain a 10% profit margin—necessary to secure funding and justify the investment risk—the overall project value would need to rise to \$7.73 million (including GST). This translates to sales prices of \$685,000 (including GST) for the two-bedroom homes and \$752,000 (including GST) for the three-bedroom homes at the time of completion.

At these price points, a household earning the mean gross income in Christchurch (\$116,525 in today's dollars) would spend at least 33% of its income on household costs, exceeding the widely accepted affordability benchmark of 30%. To keep housing expenses within 30% of income under these higher prices, a household would need a gross annual income of \$128,000 for the two-bedroom homes and \$139,000 for the three-bedroom homes (in today's dollars). Even at the lower sales prices, those income requirements would still be \$124,000 and \$135,000 respectively - representing the challenges of delivering affordable housing even with current DC's.

For households earning Christchurch's average income, these increased sales prices create an unacceptable burden, often termed "housing stress," by pushing essential

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housing costs above 30% of total income. Imposing higher DCs therefore not only undermines project viability but also forces would-be buyers into paying increasingly unsustainable proportions of their income on housing—a direct contradiction of the affordability outcomes that these developments aim to achieve.

Conversely, an appraisal was carried out to understand viability and affordability if no DCs were applied to this hypothetical development, using the original house prices as a reference point. In this scenario, the profit margin increases from 11.3% (current DC's) to 13.2%.

	Nil Development Contributions
Estimated Development Revenue excl. GST	\$6,500,000
Estimated Development Costs excl. GST	\$5,740,000
Profit (Development Value – Development Costs)	\$760,000
Profit on cost (%)	13.2%

If targeting a 10% profit on costs (the minimum threshold for securing bank finance), sales prices for completion could be reduced to \$642,000 (including GST) for the two-bedroom homes and \$705,000 (including GST) for the three-bedroom homes. Compared with the proposed DC rates, these figures represent a \$43,000 and \$47,000 saving for prospective buyers if both scenario's target a 10% profit margin.

Such findings highlight how increasing DCs undermines the original purpose of delivering affordable housing in Christchurch. Imposing higher DCs on affordable housing developments raises the risk of compromised viability, ultimately hindering the creation of genuinely affordable homes.

Accordingly, it is recommended that the Council refrain from imposing higher DCs on developments that include affordable or social housing. Maintaining—or reducing—DCs in these instances allows for-purpose developers and community housing providers to continue delivering housing at price points and margins that are both financially viable and genuinely affordable, reinforcing the long-term social and economic benefits these projects bring to Ōtautahi Christchurch.

Finally, it is strongly advised that the Council extend the application of the existing Social Housing DC Rebate Scheme⁸ to encompass both affordable and social housing developments, ensuring that project viability is not compromised.

⁸ [Development Contributions Social Housing rebate schemes: Christchurch City Council](#)

3. Call for Postponement

The New Zealand Central Government has announced a comprehensive review of development contributions, expected to be completed within the next 12 to 18 months. This review aims to establish nationally consistent guidelines for fair and effective infrastructure funding. Given the urgency of Christchurch's housing needs, we strongly recommend the Christchurch City Council postpone its proposed increases until the national review outcomes are known. This postponement will ensure alignment with national recommendations, facilitate fair and evidence-based decision-making, and protect the viability of affordable housing projects that cannot absorb additional costs.

4. Conclusion

In conclusion, the proposed increase in development contributions threatens the viability of affordable housing development projects across Christchurch. Kāinga Maha is committed to creating thriving, inclusive communities, but we need a policy environment that enables, rather than restricts, affordable development.

We urge the Christchurch City Council to:

- Postpone the proposed increases until the national review is complete.
- Engage with affordable housing developers to create a fair, sustainable contributions system.
- Implement alternative solutions that protect affordability while funding infrastructure responsibly.
- Extend the existing rebate framework beyond specific social housing initiatives, covering all genuine affordable housing, including progressive homeownership, community housing, and affordable rentals provided by CHPs or charitable organisations.

By taking a balanced, strategic approach, Christchurch can deliver more affordable housing, support economic growth, and foster inclusive communities—without unnecessary financial barriers.

Thank you for taking the time to receive, read, and consider this submission. Kāinga Maha remains hopeful for a fair outcome that enables us to continue addressing the critical need for affordable housing in our communities.

Ngā mihi nui,



Annie Wilson

Chief Executive Officer

KĀINGA MAHA

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 25/03/2025

First Name: (required) Jesse

Last Name: (required) Aimer

Name of Organisation/business:

Ensure you have the authority to submit

Christchurch International Airport Ltd

Your role: (required)

Senior Environment and Planning Advisor

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Catchments for Neighbourhood Parks and Road Network activities Catchments for Three Waters activities

Fee for development contributions assessments Household unit equivalent (HUE) multipliers update

1.2.9

What don't you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

Please see submission attached.

Catchments for Three Waters activities

You can read more about this on our Let's Talk page.

1.2.10

What do you like about our recommended policy position on the Catchments for Three Waters activities?

Please see submission attached.

1.2.11

What don't you like about our recommended policy position on the Catchments for Three Waters activities?

Please see submission attached.

Fee for development contributions assessments

You can read more about this on our [Let's Talk page](#).

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

Please see submission attached.

1.2.17

What don't you like about our recommended policy position on the Fee for development contributions assessments?

Please see submission attached.

Household unit equivalent (HUE) multipliers update

You can read more about this on our [Let's Talk page](#).

1.2.20

What do you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

Please see submission attached.

1.2.21

What don't you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

Please see submission attached.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Somewhat

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

Please see submission attached.

Attached Documents

Name
CIAL Submission on Development Contributions Review 25.03.2025



PO Box 14001
Christchurch 8544
New Zealand
Telephone (+64 3) 358 5029

christchurchairport.co.nz

SUBMISSION ON THE DRAFT DEVELOPMENT CONTRIBUTIONS POLICY 2025

To: Christchurch City Council
PO Box 345
Christchurch 8052

Name: CHRISTCHURCH INTERNATIONAL AIRPORT LIMITED

Address: Christchurch International Airport Limited
PO Box 14001
Christchurch

Introduction

- 1 Christchurch International Airport Limited (CIAL) appreciates the opportunity to comment on the Christchurch City Council's (*Council*) Development Contributions Policy Review 2025 (*Review*).
- 2 Christchurch International Airport is the largest airport in the South Island and the second largest in the country. As a modern airport, Christchurch Airport facilitates the growth and prosperity of the Canterbury region and connects our communities and the South Island/Te Waipounamu to the rest of the country and the world. It is a key destination for domestic and international passengers (both for leisure and business), and it facilitates a significant proportion of freight distribution.
- 3 CIAL's core business is to be an efficient airport operator, provide appropriate facilities for the benefit of both commercial and non-commercial aviation users, and to pursue commercial opportunities from wider complementary products, services and business solutions.
- 4 As the international gateway for Christchurch and the South Island, CIAL is a critical and strategic air connection to the world's trade and tourism market. In the 2019 financial year, approximately 7 million passengers passed through our terminals. More than 8,000 people are employed on the airport campus making it the largest single centre of employment in the South Island. Independent estimates show that for every \$1 Christchurch Airport earns, the wider South Island economy earns \$50.
- 5 CIAL owns the Christchurch Airport terminal, airfields, and surrounding land totalling over 1000 hectares. There are over 300 businesses located on or adjacent to the Christchurch Airport campus.

Network Infrastructure at Christchurch Airport Campus

- 6 CIAL owns and operates a significant portion of the network infrastructure on Christchurch Airport campus. This includes all water supply, stormwater and wastewater assets, alongside approximately 80% of the roads. CIAL is responsible for all ancillary maintenance and services (capex and opex) relating to those assets.
- 7 Specifically:
 - 7.1 *Stormwater:* CIAL collects, treats and discharges all stormwater from its landholdings through its own management system. CIAL holds two resource consents from Environment Canterbury in respect of the stormwater, a "landside" consent for discharges from the Christchurch Airport campus and an "airside" consent for discharges from hardstand within the airfield.
 - 7.2 *Wastewater:* CIAL owns and operates the wastewater management system on the Christchurch Airport campus and terminal buildings, which services the Christchurch Airport landholdings. CIAL discharges wastewater from its private network to the Christchurch City Council wastewater network.
 - 7.3 *Water supply:* CIAL does not take water from the Christchurch City Council water supply. CIAL has its own bores and network infrastructure providing a treated water supply to users located on the Christchurch Airport campus.
 - 7.4 *Road network:* As a private network owner, CIAL owns and maintains approximately 11km of roads. The Council owns approximately 2km of roads within Christchurch Airport campus. CIAL is currently undertaking most of the maintenance on these two sections of CCC roads, along with the Memorial Avenue/Orchard Road intersection.

CIAL's position in the Review

- 8 CIAL agrees with core policy objectives of ensuring that developers contribute fairly to the funding of infrastructure and facilities to service growth over the long term; and that these assets are funded in a predictable and transparent manner. However, it considers that the Council's current and proposed development contributions policy as it applies to non-residential development, and particularly those who provide private network infrastructure to this new development, does not achieve these objectives.
- 9 We set out below our high-level comment in relation to the catchment approach proposed and use of HUEs for non-residential development.
- 10 CIAL considers that this Review is an opportune time to consider how the development contribution policy can be amended to achieve its objectives. CIAL would welcome the opportunity to discuss further with Council how a more focussed contribution methodology could be applied to organisations that own and operate a significant amount of network infrastructure which service their development.

Catchment approach

- 11 Overall, CIAL considers that the proposed catchment approach to development contributions is an appropriate method for assessing development contributions and appears to broadly reflect the position of the city in terms of growth and demographics.
- 12 However, applying the broad catchment approach proposed does not allow for the more nuanced nature of campus-style developments, such as Christchurch Airport, where a significant amount of network infrastructure is privately developed, owned and maintained.
- 13 CIAL considers that the proposed catchment rates could better consider focussed campus developments supported by private network infrastructure in determining a contributions rate that fairly reflects the actual demand placed by new developments on the Council's network infrastructure.

Use of HUEs for non-residential development

- 14 CIAL considers that a more equitable method to determine reasonable contributions is required for non-residential development. In CIAL's experience, the HUE m² methodology for non-residential development generalises often complex activities and the demand that these will place on network infrastructure, which can lead to development contribution calculations that do not reflect the demand placed on Council's network infrastructure.
- 15 As set out in CIAL's submission on the existing 2021 policy, CIAL consider that, for non-residential activity, contributors based on a detailed assessment of 'the use of'/'or impact to' network infrastructure of the development is more appropriate than the current m² calculation. It should be transparent and clearly articulated how the calculation has been made.

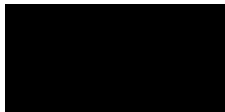
Examples for Non-residential Development

- 16 More generally, it is noted that worked examples have not been provided by Council on the impact of the changes proposed for non-residential activities. Without worked examples, it is difficult to know exactly how development contributions are proposed to apply for non-residential units. CIAL would welcome the opportunity to consider any work the Council might wish to undertake to advance that understanding.

Conclusion

- 17 Due to the self-contained nature of CIAL's network infrastructure, CIAL considers that a more focussed development contributions calculation is required to achieve the objectives of the development contributions policy.
- 18 CIAL would welcome the opportunity to discuss the content of this submission further with Council.

Dated 25 March 2025



Christchurch International Airport Limited

Rhys Boswell

Project Director

Jesse Aimer

**Senior Environment and Planning
Advisor**

Address for service:

PO Box 14001
Christchurch 8544



Development Contributions Policy Review 2025

Submitter Details

Submission Date: 26/03/2025

First Name: (required) Marie

Last Name: (required) Pollisco

Name of Organisation/business:

Ensure you have the authority to submit

Waipuna Halswell Hornby Riccarton Community Board

Your role: (required) Chairperson

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Catchments for Neighbourhood Parks and Road Network activities

Catchments for Neighbourhood Parks Road Network activities

[You can read more about this on our Let's Talk page.](#)

1.2.8

What do you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

The Board supports the Council proposal for a localised approach, with central, east, west, north, south and Banks Peninsula catchments. The Board considers that this approach better provides for the use of the proceeds of development contributions in the areas from which they are derived. This approach is appropriate for the Waipuna Halswell Hornby Riccarton Community Board Area that is a high growth area both in terms of new development and intensification.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Yes

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

The Board strongly supports all the proposed policy changes in the Draft Development Contributions Policy in particular the proposal for a localised approach, with central, east, west, north, south and Banks Peninsula catchments.

The Board wishes to speak at the hearing.

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 26/03/2025

First Name: (required) Russell

Last Name: (required) Bengé

Name of Organisation/business:

Ensure you have the authority to submit

KB Contracting & Quarries Ltd

Your role: (required)

Consultant engineers, surveyors and planners

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Land in lieu of cash development contributions

Land in lieu of cash development contributions

You can read more about this on our [Let's Talk](#) page.

1.2.18

What do you like about our recommended policy position on the Land in lieu of cash development contributions?

Changing to a Private Developer Agreement or a sale and purchase agreement from the current Land in lieu of cash Development Contributions makes sense. Our submission is to ensure there is no change in assessment criteria as a result of this, and that the value determined is not reduced as a result of the new DC policy.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Somewhat

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

We submit feedback on the proposed increase in Development Contributions (DCs), particularly regarding the Belfast (North Catchment) area, where charges are set to rise from \$29,153.47 per Household Unit Equivalent (HUE) to \$37,166.72 per HUE. This submission specifically relates to the Oakbridge development area, located off Hills Road within this catchment.

The rationale for this increase appears to be based on revised population growth projections, which indicate a decline from the higher growth estimates used in the 2021 policy. These updated projections more closely align with those from 2016, reflected in the adjusted DC charge being approximately \$2,000 lower than the 2016 policy rate.

However, there is a strong case for maintaining the current charge of \$29,153.47 per HUE. If Proposed Plan Change 14 (PC14) is made operative in its current form, it will allow the development of up to three residential units per site as a permitted activity. This could significantly increase density and growth within the catchment, particularly for a new development such as Oakbridge, which may reduce the need for such a sharp rise in DCs.

Additionally, we note that this substantial increase in DCs will ultimately be passed on to purchasers, further impacting housing affordability in the Canterbury region.

We request that the Council carefully consider these factors before finalising the proposed DC increase.

25 March 2025

Christchurch City Council
letstalk@ccc.govt.nz



SUBMISSION ON THE CHRISTCHURCH DEVELOPMENT CONTRIBUTIONS POLICY REVIEW 2025

- 1 This is a submission on Christchurch City Council's (*Council*) draft Development Contributions Policy 2025 (*2025 Draft Policy*).
- 2 The RVA welcomes this opportunity to provide feedback on the 2025 Draft Policy. The RVA and its members have a significant interest in how the 2025 Draft Policy will impact on, and support, the provision of retirement villages and aged care in Christchurch.
- 3 In summary, for the reasons set out in this submission, the RVA requests that the Council:
 - 3.1 Pause the bulk of its review of the development contributions (*DC*) policy and further investigate when, and if, all infrastructure projects covered by the 2025 Draft Policy are needed to service the now lower growth projected by Council. It would be unfair to simply pass on the higher costs of infrastructure to a smaller group of developers that intend on completing development over the next 10 year period. Some Council infrastructure could be built at a later stage as growth comes on stream. And, the cost of works that do need to occur should be more fairly spread over a longer time period, given the infrastructure will benefit future generations beyond the current 10 year period.
 - 3.2 Align any further work on the Council's DC policy with central government's proposed new development levy regime, which it is understood will replace DC policies throughout NZ. It is premature to be rolling out the substantive changes sought in the 2025 Draft Policy while that national work is advancing.
 - 3.3 Amend the units of demand for retirement villages in Table 4 of the 2025 Draft Policy as set out at paragraph 38 below. These units more fairly reflect the actual demand retirement villages place on Council infrastructure. The RVA also requests that the Council provide the reasoning and supporting technical information for its proposals to increase retirement village HUE rates for reserves. The changes appear arbitrary. They do not align with the RVA's own evidence. They also don't align with the accepted approach of other major cities. The proposed approach is a substantial retrograde step from the prior policy.
 - 3.4 Amend the 2025 Draft Policy so that a special assessment can be requested by a developer in any circumstance and will need to be supported by evidence that demand from a development is substantially less than the assumed demand.
- 4 The RVA is happy to meet with Council officers to discuss this submission and speak to Council decision-makers tasked with confirming the 2025 Draft Policy. The RVA has been involved in DC policies around the country. We have built up a wide body

of experience and evidence in relation to the matters addressed in this submission, which we are keen to share with you.

Introduction to the RVA

- 5 The RVA is a voluntary industry organisation that represents the interests of the owners, developers and managers of registered retirement villages throughout New Zealand. The RVA has 422 member villages throughout New Zealand. Those members have built and now operate approximately 43,700 units, which are home to around 53,000 older New Zealanders. This figure is 96% of the registered retirement village units in New Zealand.¹
- 6 The RVA's members include all five publicly-listed companies (Ryman Healthcare, Summerset Group, Arvida Group, Oceania Healthcare, and Radius Residential Care Ltd), other corporate groups, including Bupa Healthcare and Metlifecare, independent operators, and not-for profit operators (such as community trusts, and religious and welfare organisations).

Importance of retirement villages

- 7 New Zealand and Christchurch are facing a retirement living and aged care crisis. There is a severe lack of appropriate housing and care for our growing ageing population. This problem is immediate and projected to worsen over the coming decades.
- 8 The Government has recognised the ageing population as one of the key housing and urban development challenges facing New Zealand in its overarching direction for housing and urban development - the Government Policy Statement on Housing and Urban Development (*GPS-HUD*).² The GPS-HUD records that "[s]ecure, functional housing choices for older people will be increasingly fundamental to wellbeing."³ The Christchurch City District Plan also recognises that Christchurch's population is ageing and recognises the need to provide for a diverse range of housing options suitable to the needs of older persons.⁴
- 9 Retirement villages provide appropriate accommodation and care for a vulnerable sector of our community. They allow older people to continue living in their established community, while down-sizing to a more manageable property (i.e. without stairs or large gardens). Retirement village living provides security, companionship and peace of mind for residents.⁵ Residents will also, in most cases, have easy access to care and other support services.
- 10 Retirement villages already play a significant part in housing and caring for older people in New Zealand. Nationally, 14% of the 75+ age group population currently live in retirement villages, a penetration rate that has risen from around 9.0% of the 75+ age population at the end of 2012.⁶ In Canterbury, the current penetration rate is 15.1% of the 75+ age population.

¹ There are also around 6,400 Occupation Right Agreements for care suites as part of the aged care system.

² The GPS-HUD was issued in September 2021.

³ GPS-HUD, page 10.

⁴ Christchurch District Plan, Chapter 3 Strategic Directions, 3.2.4 Longer-term population change and Chapter 14 Residential, and Proposed Policy 14.2.1.6 introduced pursuant to Plan Change 14, which is pending a final decision by the Minister for RMA Reform.

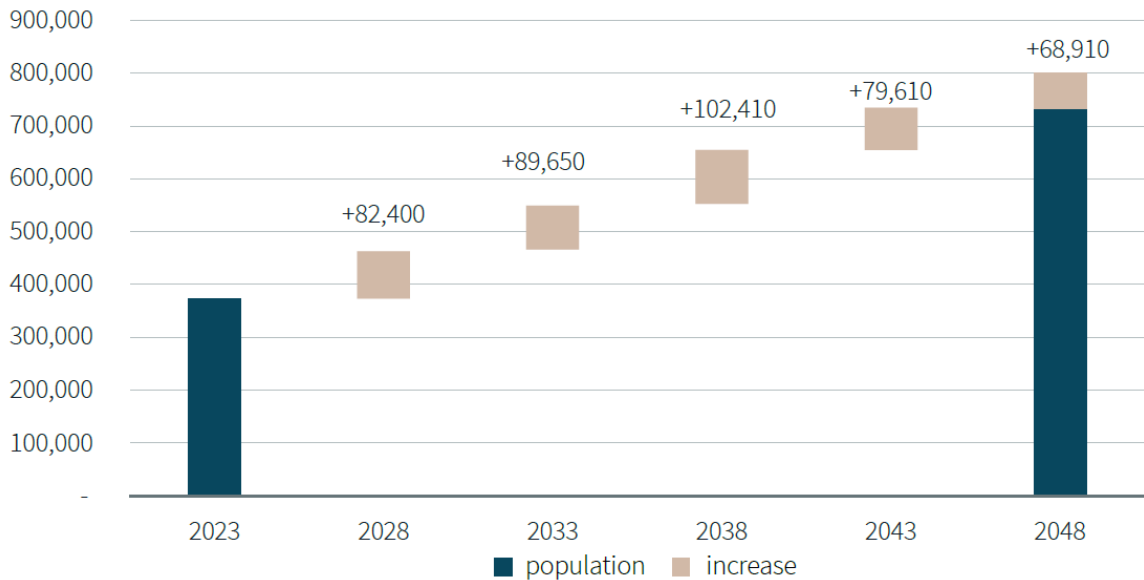
⁵ PWC 'Retirement village contribution to housing, employment, and GDP in New Zealand' (March 2018). Brown, N.J., "Does Living Environment Affect Older Adults Physical Activity Levels?". Grant, Bevan C. (2007) 'Retirement Villages', *Activities, Adaptation and Aging*, 31:2, 37-55.

⁶ Jones Lang LaSalle, NZ Retirement Villages and Aged Care Whitepaper, August 2023, page 29 and

Increasing demand for retirement villages

- 11 The proportion of older people compared to the rest of the population in New Zealand, and in Christchurch, is increasing greatly. The 75+ demographic in Christchurch will increase between 2023 and 2048, from 28,490 to 49,800.⁷ The 85+ increase is even more significant, with the 85+ demographic in Christchurch to more than double between 2023 and 2048 from 8,100 to 17,180.⁸

Figure 8: Forecast population for 75+ years age bracket to 2048



Source: Statistics New Zealand

Figure 1: Total New Zealand 75+ years population 2023-2043

- 12 Demand for retirement village accommodation is outstripping supply. The ageing population and longer life expectancy, coupled with a trend towards people wishing to live in retirement villages that provide purpose-built accommodation, means that demand is continuing to grow.
- 13 There are currently 50 retirement villages in Christchurch and 5153 residents in these villages,⁹ which represents only 17% of the 75+ age group population.¹⁰ The RVA considers that currently consented retirement village developments in Christchurch will be entirely inadequate to meet this demand.
- 14 Delivering retirement villages and aged care beds to meet the projected need is contingent on a number of factors, including property market conditions, construction, building materials, and labour costs, timing of resource consent approvals, as well as the feasibility of projects which includes regulatory barriers and costs such as DC charges. DC charges that are predictable and proportionate to the

Jones Lang LaSalle, NZ Retirement Villages Whitepaper, August 2024, page 35.

⁷ StatsNZ, Aotearoa Data Explorer, Statistical area 2 population projections, by age and sex, 2018(base)-2048, linked [here](#).

⁸ Ibid.

⁹ As at 31 December 2023.

¹⁰ Based on StatsNZ Subnational population estimates (TA, SA2), by age and sex, at 30 June 1996-2024 (2024 boundaries), year at 30 June 2023.

demand placed on community facilities by the development will help deliver the needed accommodation and care for older persons.

Statutory framework for development contributions

- 15 A DC policy, and the process followed to develop it, must strictly comply with the relevant provisions of the Local Government Act 2002 (*LGA*). The key legislative requirements are:
- 15.1 Fairness, equity and proportionality when setting DCs;
 - 15.2 DCs should only be required where there is a causal connection between the development demand and the need for new assets or assets of increased capacity which council will need to fund;
 - 15.3 DCs should reflect the need generated and the benefit received by the user;
 - 15.4 Developments can be grouped to provide for administrative efficiency, where it is fair and equitable to do so; and
 - 15.5 The DCs regime should be clear, transparent and predictable.

Submission 1: Pause review in light of growth projections and changes to infrastructure funding

- 16 The Council has amended its growth projections as part of the 2025 review, and says that “*higher costs are being spread across fewer projected new households*”.¹¹ As a result, the Council is proposing DCs that are *significantly* higher than the current 2021 DC Policy (*2021 Policy*) (with more modest increases and some decreases compared to the previous 2016 policy).¹²
- 17 It is unclear if all of the infrastructure projects covered by the 2025 Draft Policy are needed to service the now lower growth projected by Council. Even if the projects are required, we expect some of them could be undertaken at a later stage as growth comes on stream and/or the costs associated with those projects should be spread over a longer time period so that they are fairly allocated to the growth that will benefit from them. It would be unfair, and inconsistent with the LGA, to simply pass on the higher costs of infrastructure to a smaller group of developers that intend on completing development over the next 10-year period.
- 18 Further, the Government has recently announced major changes to infrastructure funding, which will result in the DC system being replaced with a development levy system.¹³ Legislation is expected to be enacted in mid-2026, with the new system beginning in 2027. Given these upcoming changes, the 2025 Draft Policy can be expected to be in effect for only 1.5 – 2 years.
- 19 The RVA considers any further work on the Council’s DC policy should align with central Government’s proposed new development levy regime, which it is understood will replace DC policies throughout NZ. It is premature to be rolling out

¹¹ See “Charges” section: <<https://letstalk.ccc.govt.nz/DevelopmentContributions>>.

¹² 2016, 2021 and 2025 development contribution charges, available here: <https://hdp-au-prod-app-ccc-letstalk-files.s3.ap-southeast-2.amazonaws.com/1317/4042/5832/DC_charges_-_2016_2021_and_2025.pdf>.

¹³ See the Beehive release available here: <<https://www.beehive.govt.nz/release/going-housing-growth-new-and-improved-infrastructure-funding-and-financing-tools>>.

the substantive changes sought in the 2025 Draft Policy while that national work is advancing.

Relief sought

- 20 For the above reasons, the RVA requests that the Council pause this review and roll-over the current 2021 Policy, until the new regime is established.

Submission 2: Units of demand for retirement village units and care suites

- 21 The RVA is concerned that the units of demand for retirement units and care suites in the 2025 Draft Policy do not reflect the demand created by retirement villages and in some cases are higher than the current 2021 Policy.

Proposed changes to units of demand

- 22 The 2021 Policy set units of demand for retirement villages based on a submission from Summerset and comments from Council staff that the "*retirement village sector has evolved over recent years*", and "*the way the Council assesses these villages needs to be refined to better align with development trends*".¹⁴

- 23 The 2025 Draft Policy proposes the following changes to the units of demand for retirement units and care suites:

23.1 Reserves:

- (a) Retirement units: the unit of demand is proposed to *increase* from 0.1 HUE in the 2021 Policy to 0.25 HUE in the 2025 Draft Policy;

23.2 Transport:

- (a) Retirement units: the transport-related unit of demand is proposed to *decrease* from 0.5 HUE in the 2021 Policy to 0.3 HUE in the 2025 Draft Policy; and
- (b) Care suites: the transport-related unit of demand is proposed to *increase* from 0.1 HUE in the 2021 Policy to 0.2 HUE in the 2025 Draft Policy.

- 24 The Council has not recorded these proposed changes in its "*Proposed policy changes for consultation*" and therefore no reasons have been provided for them.¹⁵

Units of demand for reserves

- 25 The RVA opposes the proposed increase in the unit of demand for reserves for retirement units.
- 26 Retirement villages have a substantially lower demand profile than standard residential developments. In addition to low occupancy levels, this lower demand profile is due to:

¹⁴ Hearings Panel: Draft Development Contributions Policy 2021 – meeting on 21 May 2021, p60 and 80, available here: https://christchurch.infocouncil.biz/Open/2021/05/BLHP_20210521_AGN_7039_AT.PDF.

¹⁵ Draft Development Contributions Policy 2025 – Proposed policy changes for consultation, available here: https://hdp-au-prod-app-ccc-letstalk-files.s3.ap-southeast-2.amazonaws.com/6617/4043/8435/Draft_Development_Contributions_proposed_policy_changes.pdf.

- 26.1 Reduced activity levels of the residents due to their age and frailty; and
- 26.2 Specialist on-site amenities provided to cater for residents' specific needs, which reduces residents' need to travel to access care, services or entertainment.
- 27 There are clear barriers that prevent older adults from undertaking physical activity in the New Zealand context – mainly cost, and the lack of purpose built facilities and programmes. Research shows that residents choose to engage in activities within a friendly and purpose built environment, which is often not provided by the local authority or others in the wider community. The research further identifies that there is often so much to do within a retirement village that there is very little time for other activities.¹⁶
- 28 In the context of sporting and recreation facilities, Sport New Zealand research similarly confirms that activity levels taper off as people age.¹⁷ In particular:¹⁸
- 28.1 people aged 75+ participate in active recreation less often than people in all other age groups;
- 28.2 people aged 75+ participate in fewer types of active recreation than people in all other age groups; and
- 28.3 the main barriers that prevent people aged 75+ from participating in active recreation more often or trying a new type of active recreation are poor health/disability/injury, lack of motivation, cost, lack of time, and lack of confidence.
- 29 Surveys of retirement village residents at Ryman villages in Auckland in 2017 provide an example of this lower demand, showing that the residents made very little use of community infrastructure. The survey data was ultimately relied on to support a successful objection by Ryman under the LGA objection process that its proposal created substantially reduced demand on council facilities. This work also led to Auckland Council reviewing its DC policy to substantially reduce its household unit equivalent rates – to 0.1 HUE for reserves and community facilities for retirement units.¹⁹ Wellington City has also adopted a unit of demand of 0.1 HUE for reserves and community facilities for retirement units.²⁰
- 30 As noted above, no evidence has been provided by the Council to justify its proposal to increase the unit of demand for reserves for retirement units, or counter the Council's 2021 decision to lower the units of demand for retirement units for reserves to 0.1 HUE.
- 31 Based on the evidence contained in this submission, the RVA considers the unit of demand for reserves for retirement units should remain at 0.1 as per the 2021 Policy.

¹⁶ Brown, N.J., "Does Living Environment Affect Older Adults Physical Activity Levels?" Grant, Bevan C. (2007) 'Retirement Villages', *Activities, Adaptation and Aging*, 31:2, 37-55.

¹⁷ *Sport and Active Recreation in the Lives of Auckland Adults: Results from the 2013/14 Active New Zealand Survey*, pages 22-23, 30-31, 50-53.

¹⁸ Ibid.

¹⁹ As in current Auckland DC Policy 2022 (Variation A), p20, and proposed DC Policy 2025, p18.

²⁰ As in current Wellington DC Policy 2024, p17.

Transport-related units of demand

- 32 Based on information collected by RVA members for operational retirement villages across New Zealand and accepted by other councils in New Zealand, retirement units generate around 30% of the trips of a standard dwelling and aged care rooms generate around 20% of the trips of a standard dwelling (accounting for staff and visitor movements, as well as service deliveries).
- 33 Accordingly, the RVA supports the proposed amendments to the transport-related units of demand (a *decrease* for retirement units and an *increase* for care suites).

Units of demand for water and wastewater

- 34 The 2025 Draft Policy proposes the following units of demand for retirement villages:
- 34.1 Retirement units: 0.5 HUE (for water and wastewater).
- 34.2 Care suites: 0.4 HUE (for water and wastewater).
- 35 The 2025 Draft Policy also records that the assumed demand per household (1 HUE) is 644.80 L/day for water and the assumed discharge per household (1 HUE) is 572 L/day for wastewater.
- 36 Information collected by RVA members for operational retirement villages across New Zealand indicates that the demand created for water and wastewater is 260 L/day and 208 L/day for retirement village units and 200 L/day and 160 L/day for care suites respectively. Retirement village units also have a more even demand graph than that of typical residential demands, with peak demand periods later in the morning and earlier in the evening.
- 37 When comparing this evidence on demand/discharge to the assumed demand/discharge of a HUE in the 2025 Draft Policy, the RVA considers the unit of demand should be:
- 37.1 Retirement unit: 0.4 (for water and wastewater).
- 37.2 Aged care room: 0.3 (for water and wastewater).

Relief sought

- 38 For the reasons set out above, the RVA requests the following amendments to Table 4 of the 2025 Draft Policy in order to meet the LGA requirements of fairness, equity and proportionality:

Land use classification	Measure	Water supply	Wastewater collection	Wastewater treatment and disposal	Stormwater & flood protection	Transport-related	Reserves	Community Infrastructure
Retirement villages – ~~residential~~ <u>retirement</u> unit only ⁴	Per residential unit	~~0.50.4~~	~~0.50.4~~	~~0.50.4~~		0.3	~~0.250.1~~	0.1
Retirement villages – <u>aged</u> care ~~room~~ <u>suite</u> only ⁴	Per room	~~0.40.3~~	~~0.40.3~~	~~0.40.3~~		0.2	Nil	<u>Nil</u>

⁴ Stormwater and flood protection development contributions for residential units in retirement villages are assessed using non-residential HUE equivalences for ISA.

Submission 3: Definitions

- 39 The 2025 Draft Policy includes definitions for “retirement village”, “retirement unit” and “residential care room”. However, the clauses addressing the assessment of DCs for retirement villages use the terms “residential unit” and “care suite” (see 3.2.5 and Table 4). To ensure the proper application of the 2025 Draft Policy, the defined terms should be used throughout the document.
- 40 In addition, the RVA considers the definitions contained in the 2025 Draft Policy are unclear and not an appropriate reflection of retirement villages, as follows:
- 40.1 The definition of “retirement village” includes “*a development that contains two or more residential units and shared-use community facilities for the residential accommodation of people who ... require residential care*”. The RVA considers residential care facilities should be addressed separately in the 2025 Draft Policy to provide clarity for users of the document and ensure charges are fair, equitable and proportionate.
- 40.2 The definition of “retirement unit” excludes aged or residential care rooms, but there is no definition of aged care rooms in the 2025 Draft Policy.
- 40.3 The definition of “residential care room” covers rooms within a retirement village or rest home, as well as other residential care facilities. As noted above, the RVA considers residential care facilities should be addressed separately in the 2025 Draft Policy.

Relief sought

- 41 For the reasons set out above, the RVA requests the following amendments to the 2025 Draft Policy:
- 41.1 Add a definition of “aged care room” as follows: any dwelling unit in a “rest home” or “hospital care institution” as defined in section 58(4) of the Health and Disability Services (Safety) Act 2001.
- 41.2 Amend the definition of “retirement unit” as follows: *means any self-contained residential unit within a retirement village but does not include aged ~~or residential~~ care rooms.*
- 41.3 Amend the definition of “retirement village” as follows: *means a development that contains two or more ~~residential retirement~~ units or aged care rooms and shared-use community facilities for the residential accommodation of people who are predominantly retired ~~and/or require residential care~~. Retirement villages and residential care are the only residential development types assessed for development contributions using a HUE equivalence method.*
- 41.4 Amend the definition of “residential care room” as follows: *means a ~~room within a facility providing rest home care, retirement village, or other care facility, or a room within a home for the residential care of older persons. This also includes~~ care rooms in a residential facility. It does not include aged care rooms.*
- 41.5 Amend clause 3.2.5: Residential Retirement units and ~~care suites~~ aged care rooms are assessed for development contributions as set out in Table 4;
- 41.6 Amend column 1 in Table 4, as set out at paragraph 38 above; and

41.7 Consequential amendments to provide clear definitions and methodology for assessing DCs for residential care facilities.

Submission 4: Special assessments

- 42 As set out above, the 2025 Draft Policy will result in retirement villages being charged DCs that are disproportionate to the demand created by those developments. The units of demand are therefore inconsistent with the LGA requirements set out at paragraph 15 above.
- 43 However, as it stands, retirement village operators would not be able to request that the Council undertake a special assessment in most cases. The 2025 Draft Policy only allows a developer-requested special assessment where: *"[t]he development is expected to place less than half the assumed demand on infrastructure for the value identified as average for that type or location of development as set out in Table 4"*. It also records that the decision *"is at the Council's sole discretion"*.²¹
- 44 The requirement for demand to be *"less than half"* and also at Council's sole discretion is inconsistent with the LGA requirements of fairness, equity and proportionality. For example, the differences in the units of demand for water and wastewater set out at paragraph 38 above are 20%, and therefore would not meet the 50% gateway test for access to the special assessment process. Nevertheless, the difference in demand would be substantial across a retirement village.
- 45 The approach set out in the 2025 Draft Policy would force retirement villages to use the LGA objection process, which is available where there are *"features of the objector's development that, on their own or cumulatively with those of other developments, would substantially reduce the impact of the development on requirements for community facilities"*.²² It is highly inefficient for the 2025 Draft Policy to drive use of the LGA objection process, by setting an artificially high gateway to the special assessment process.
- Relief sought**
- 46 For the above reasons, the RVA requests that the Council amend the 2025 Draft Policy so that a special assessment can be requested by a developer in any circumstance and will need to be supported by evidence that demand from the development is substantially less than the assumed demand.

Yours faithfully

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²¹ 2025 Draft Policy, 3.2.4.

²² Local Government Act 2002, s199D(a).



UDINZ Submission on Christchurch City Councils Development Contributions Policy 2025

March 2025

UDINZ

creating urban communities together

UDINZ Submission on Christchurch City Council Development Contributions Policy 2025

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About the Submitter

The Urban Development Institute of New Zealand (UDINZ) was formed in 2019 and was officially launched in 2020. It has a national board and currently has three chapters respectively in the Auckland, Wellington and Canterbury regions.

It has in excess of 205 (predominantly organisational) members from across the development ecosystem.

UDINZ was formed with the intention of bridging the gap between the public and private sectors and the various disciplines working in Urban Development so as to remove barriers to quality urban development. We do this by bringing insights and industry together for the benefit of people and communities.

The intention is to share knowledge, international best practice and new technologies and increase transparency across the system to reduce uncertainty for all that are part of development processes.

The objective is resilient, sustainable and healthy communities for all in Aotearoa.

Around 86% of New Zealanders live in urban areas, but there is little consensus about what makes a “sense of place” in those communities. There are many contributing factors. UDINZ focuses on issues that its members broadly agree are relevant and compelling and in relation to which UDINZ can effect change. It aims to lead the development of an “NZ Inc” approach.

UDINZ:

- Defines and advocates for a new urban development paradigm for Aotearoa New Zealand;
- Provides an environment for the sector to work together including with central and local government agencies to build relationships and understanding that reduce uncertainty and increase consistency between policy jurisdictions, as well as aligning policy and implementation;
- Runs events that bring the sector together to discuss issues and facilitates collaboration around best practice- connecting and coordinating people working in urban development;
- Builds knowledge through provision of data, evidence-based research and domestic and international learning as well as case studies demonstrating different approaches and best practice; and
- Provides and supports talent development and training in areas particular to the advancement of good urban development.

Introduction

What is the Development Contributions Policy 2025 Christchurch City Council is consulting on:

The Christchurch City Council Development Contributions Policy sets out the methodology that the Council is proposing to use to calculate the amount it charges for Development Contributions (DCs) which are levied on those developing land or buildings that are perceived to increase demand on Council infrastructure. That policy was last reviewed in 2021.

DCs may be required upon the granting of a resource consent, building consent, certificate of acceptance, or a service connection authorisation.

The policy is designed to address the additional demand which development is considered to place on Council facilities, services and infrastructure. These include the provision of water supply, wastewater collection, wastewater treatment and disposal, public transport, active transport, swimming pools, libraries and cemeteries.

Anyone who applies for a building consent, certificate of acceptance, resource consent or service connection to:

- subdivide their land
- construct additional residential units
- construct new non residential buildings (commercial, retail or industrial)
- construct additional non-residential gross floor areas or impervious surface areas
- change their business activity or increase the number of tenancies
- create new service connections

is potentially liable for Development Contributions.

Most people building residential units on vacant lots, making changes to their existing homes or replacing a home or building on a like-for-like basis are not required to pay DCs. The exception to this is where the alterations create an additional, self-contained residential unit or where the alterations change the dwelling type.

DCs for non-residential developments are calculated through a formula of adjustments to the Household Unit Equivalent (HUE) rate and vary depending upon the scale and use of the building.

A development contribution will be required if the proposed number of HUE exceeds the number of existing HUE within the development site.

DCs will be invoiced and required to be paid before the:

- issue of a s224(c) certificate for a subdivision resource consent;
- commencement of a land use resource consent;
- issue of code compliance certificate for a building consent;
- authorisation of a service connection

The DC Policy details all the capital projects which the Council has provided or will provide to service growth development, and the total growth component of that project. These are outlined in the Schedule of Assets. The total cost of all capital projects in the 2021 Schedule of Assets is \$2.59 billion and the “growth component” of these projects has been assessed at \$730 million.

The Schedule of Assets in the draft policy contains \$3.41 billion of total capital expenditure, of which \$923 million is allocated to growth.

The Council identifies the cost of new assets required to service the demand on infrastructure resulting from growth. For some activities this is done at a district-wide level and for other activities it is done at a sub-district or catchment level.

Council staff review each capital project and determine the allocation of cost drivers:

- renewal: replacement of end-of-life assets;
- backlog: new or upgraded assets required to meet new levels of service;
- increase in current levels of service; and
- growth.

Introduction (cont.)

Only the cost of infrastructure to service growth can be funded from DCs.

An asset can have multiple cost drivers, so a project that is primarily renewal or backlog may include the upsizing of the asset to cater for forecast growth demand. This means projects in the DC schedule of assets often have multiple cost drivers.

DC charges are calculated per HUE on a per project basis, by dividing cost to deliver the growth component of an asset by the projected growth. The increase in DC charges has been caused by an increase in the cost to deliver infrastructure to service growth and a decrease in the number of projected new households..

Council states that the 2024 growth forecast has a slower rate of growth in all aspects compared to 2021 (an average 0.52% per annum over 30 years compared to 2.06% in 2021). It states the cost of growth is being spread across fewer new households there has been an increase in DC charges.

The inputs for the Council's DC Policy reviews are based on revised projections from Statistics New Zealand medium population and household growth scenarios

Growth projections that informed the 2021 policy were significantly higher than in the previous policies due to post-earthquake population shifts and changes in the district.

Following the earthquakes in 2010 and 2011, Christchurch experienced sudden and rapid decrease in population, driven by a significant downwards swing in net migration.

Between June 2010 and June 2012, the city's population decreased by 21,200 usual residents. By June 2017 the population had recovered to above pre-earthquake levels, which equates to the city growing by an average of around 5,000 usual residents each year. This is around 1,000 more people per year than the city averaged in the 10 years before the earthquake sequence.

Since the city recovered to its pre-quake population in 2017, the rate of growth has slowed. In the six years since June 2017, the city has grown by around 2,600 people per year

The accelerated growth that the city experienced post-quake during the rebuild was reflected in the 2013 projections that underpinned the 2021 policy, resulting in a higher level of projected growth (and lower DCs) than in the past.

Statistics New Zealand's revised projections have since been released and have been used in the development of the draft DC Policy to reflect the more recent growth patterns that the city has experienced.

Central Government policy change has not impacted Christchurch City Council Policy review

The Coalition government has very recently announced (28 February 2025) a comprehensive review of development contributions, expected to be completed within the next 12 to 18 months and its replacement with a new system of Development Levies and a range of other tools for paying for Infrastructure, including targeted rates.

In light of that and the proposed creation of nationally consistent guidelines for fair and effective infrastructure funding, our preference would have been that council seek to postpone its proposed review of the Development Contributions policy until the national review outcomes are known.

Our understanding is that it is Council's intention to proceed with the review of the current Development Contributions policy rather than seeking an extension of the time to review its policy notwithstanding the change in national direction.

Some specific concerns/questions

Revised Residential Unit Assessment Criteria

A number of our members have expressed concerns to us about the revised Residential Unit Assessment Criteria.

The previous discount provisions for units under 100m² have been removed with all two- and three-bedroom units with gross floor areas less than 100m² being charged 1 HUE (Household Unit Equivalent), regardless of size.

This is an increase in charges from the 2021 Policy, where a reduction in HUE charges was assessed in relation to floor area with units with 80m² gross floor area charged 0.8 HUE and units with 60m² gross floor area charged 0.6 HUE.

One bedroom units will be assessed at 0.6 HUE.

Inversely larger residency units with seven or more bedrooms will be assessed at 1.4 HUE (previously 1 HUE). This is apparently aimed at multi-tenancy developments that place a higher demand on infrastructure.

Some members have told us they believe there is a disconnect as the assumption that a household unit with more than one bedroom houses a family, does not necessarily hold true. They say the infrastructure demands of the residents of a two bedroom unit utilising the second bedroom as a work from home and periodic visitor accommodation will differ little from the demands of a couple occupying a one bedroom unit.

In kind contribution to infrastructure

Previously, developers could request remissions (reductions) in "unique and compelling" circumstances. This has been removed, meaning developers will no longer be able to seek a remission of a development contribution requirement from Council.

Similarly Land in lieu provisions that gave developers the option of vesting land for public purposes rather than financial payments has been removed

The ability to adjust stormwater component of DCs where the development ameliorated stormwater demand has

also been removed.

Given the capacity of infrastructure can be supplemented and extended by such measures and also do double duty as recreation spaces this is doubly disappointing for developers and city residents. It runs counter to international trends in the development of blue green infrastructure.

Growth apportionment, not HUE apportionment

Some have questioned whether there has been a correct allocation between existing ratepayers and new development. Surely the cost of infrastructure would diminish if the growth is down on initial projections. The statement that DCs are more because there are less growth household units to spread the costs across, suggests the relationship between household units and infrastructure needs has been eschewed in favour of simply allocating a portion of the costs to growth regardless of causation.

Charges for assessment of DC contribution

The new proposal where a charge will be levied for assessment of the development contribution to be made by the particular development is also opposed by our members. One queried why they should pay for the time of council staff when they are already paying application fees for resource consents and building consent processes.

Overarching “in principle” comments

Infrastructure shortfall does need to be funded

UDINZ recognises the infrastructure deficit and accepts the concept that all beneficiaries of infrastructure should pay their fair share. We are also accepting of the notion that those conducting developments (developers) are used by local government to collect contributions towards additional infrastructure from the consumer(s) that will ultimately benefit from that new infrastructure (as long as it is indeed them that benefit). To that point some have questioned whether sufficient consideration has been given to those who actually benefit and to some of the cost of additional infrastructure being borne by the entire ratepayer base (or indeed taxpayer base). Some argue all in the community benefit from the increased housing supply (increased rateable/tax base, essential workers housed, enhancement of affordability etc).

Cross subsidisation suspected

Development contributions should be better aligned to the areas and individuals that benefit from the infrastructure. There appears to be significant cross-subsidies between existing and future ratepayers, and between areas of growth. Legally recovery must occur over the life of an asset, not in a foreshortened period.

Public need confidence in methodology

It is not clear in all instances how costings on infrastructure have been arrived at and whether they are robust and defensible.

Not all of the supporting material has been provided

It is the job of Council to establish the basis for charging, not the role of the development community to check the veracity of the costs.

It is suggested that all costings should be independently audited (with an opinion, which the public can rely on, confirming methodology, calculations and assumptions are consistent with legislation and Christchurch Council Policy) and conventional discounting practices applied for future spend.

There is some concern with the move to a 30 year period of infrastructure projections. The development community is generally comfortable with the rigorousness of the LT Plan (financially viable, deliverable, aligned to policy and subject to Audit Office review). That comfort and confidence is just not shared in relation to 30 year projections.

Increases are greater than had been expected

The increases are unreasonably large compared to current development contributions and further consideration should be given to alternative ways to fund the required infrastructure including by use of some of the tools recently announced by central government.

Affordability & market health

The policy further undermines the affordability of housing for first home buyers where any increase in DCs will ultimately be passed on to the end user and presents a significant barrier to smaller developers.

Absence of staged implementation will drive perversities

The absence of a staged transition may lead to inequitable and supply-reducing outcomes for eg: (a) Those that have land already and are sufficiently progressed will submit Resource Consents as soon as possible; (b) Where they have land but are not ready or are concerned about feasibility with DCs they will delay their plans; and (c) Those that do not yet have land will simply eschew the area with the higher development contributions in favour of adjacent neighbouring suburbs.

In order to potentially avoid an increase in DC's under a new policy, many will look to bring projects forward to get consents in prior to the policy coming into play. This means the ratepayers generally, will bear a greater burden. It also places a consent resourcing burden on Council in the interim. A staged implementation could have lessened the all or nothing impact.

Overarching “in principle” comments (cont.)

Council should consider whether they need a staging plan. It's important that developers who've invested in land for housing are able to proceed with those plans—some of which may already have finance—unimpeded by the constraints the new policy may impose. A period of 18 months or so would permit those plans already in train to be submitted, perhaps with phased increases thereafter.

DCs influence on housing supply (via development feasibility) and prices

Our members fundamentally disagree, based on their collective experience, with the economic analysis suggesting that higher DCs do not generally lead to higher house prices, at least in the short term (although longer term it may have that effect).

While there is an impact from the wider housing market, higher DCs are obviously factored into feasibility analysis and ultimately what developers seek to charge for the product they produce (they do not have an ability to exponentially absorb such costs).

Consumer appetite for a resultant price is the most likely determinant of go/no go decision-making.

DCs impact feasibility

We are hearing implementation of the Development Contributions policy will result in a reevaluation of the feasibility of projects and potentially prevent some proceeding. This decreases certainty about future growth and development. In a worst case scenario, this could result in investment in infrastructure that is not utilized to the level anticipated.

Impact Economically on viable yield

No consideration seems to have been given to the impact that the DC policy will have on overall yield. It might not be economically feasible to develop to the yield/intensity that that Council has zoned for (and projections of 30 year supply). This could itself have included in its implications for projected

infrastructure investment—most likely over estimating quantum and cost.

Perception of double dipping

Any payment must not involve double dipping.

There is a suggestion in some instances that the costs of infrastructure included in the projected spends by Council has already in fact already been completed by Central Government (Kainga Ora). Some in the development community say these are already included in the cost of land and paid for by the land developer and so an attempt by Council to also recover contributions equivalent to the costs of such infrastructure would be “double dipping”. It is also not clear whether any funding from third parties such as grants, developer funded works, and any funding from financial contributions and targeted rates is excluded from projections and if so how this will be accommodated.

Council will need to confirm further work is intended and required to be able to legally recover any costs in this regard. The counterfactual is that superlots in those areas will be cross subsidizing growth elsewhere in the suburb.

Member comments

“The sheer increase in cost is just too high at a time when the building industry is facing severe pressure and stress, a housing crisis, and battling with increasing costs. These further increases are going to result in damage to the already high cost of building, hamper consumer confidence, and result in a significant reduction in the number of developers.”

“New Zealand is in a housing crisis, due to the collision of low housing availability and housing affordability. House prices have increased dramatically and we need more homes to satisfy current demand and to stabilise the housing market. Further increases to development contributions will only discourage building activity in the city, as consumers weigh up the cost of building here as compared with cheaper parts of the country.”

“I’m concerned we allow for community infrastructure works, such as that undertaken by schools, charitable organisations or charitable trusts and to support the principles in the preamble to Te Ture Whenua Māori Act 1993. Council should definitely exempt social housing developments undertaken by Community Housing Providers and the Crown (as well as iwi trusts), where the organisations in question own the land and are undertaking the development directly. Consideration should also be given to relief in situations where social housing providers opt to purchase market housing from a private developer for the purpose of social housing, rather than undertake the development themselves. .

Not including the proposed exemption may disincentivise the development of social housing.

“We all understand the need to contribute to the cost of supporting infrastructure for new construction and developments. However, make no mistake, any increase in the cost of Development Contribution's will be passed on by developers to the buyer. This will ultimately increase the cost of construction and make it harder for developers to deliver affordable housing. In some instances it could prevent some developments going ahead altogether.

“There are grounds for imposing the cost of some general local public goods on landowners who benefit. The cost of supplying public goods such as neighbourhood parks, reserves, outdoor recreation facilities and stormwater systems that exclusively or predominantly service or enhance a development and are located within a development, may be appropriately imposed on relevant households and businesses by requiring the developer to pay for, or provide, the facilities. There should be a close connection between the subdivision or development on the one hand, and the relevant infrastructure and facilities on the other.

“It is questionable whether a 30-year view of infrastructure requirements will enable compliance with the fairness, equity, proportionality, and causal requirements of the Act.

The horizons are too long and far out to be able to properly model impacts, but there is a real concern that this can only impact feasibility, supply and affordability.

“The proposed increase in development contributions presents a major challenge to the financial feasibility of affordable housing projects. Unlike traditional developers who typically target higher profit margins (generally in the range of 15%–20%) and pass increased costs onto buyers, we operate on slim margins, in light of the mixed-tenure housing outcomes we seek to unlock, to enable the homes we develop to be sold at affordable price-points and to ensure we maximise the broader outcomes (environmental, social and economic) outcomes realised.

Member case study: Central Catchment

A UDINZ member, Kainga Maha, undertook a high-level development viability assessment based on a hypothetical project in the Christchurch Central Catchment. We have included this case study with their consent to show how feasibility and affordability are impacted by development contributions.

This theoretical development is assumed to comprise of 11 homes—8x two-bedroom units and 3x three-bedroom units—aimed at first home buyers on a modest income.

Under the current DC rate of \$8,126.76 per Household Unit Equivalent (HUE), the total development cost for these contributions would be approximately \$89,000.

In contrast, the proposed DC rate of \$29,562.70 per HUE pushes the total closer to \$325,000, causing overall development costs to rise from \$5.84 million to \$6.11 million

Cost	Current Development Contributions	Proposed Development Contributions
Land bidding, Due Diligence and Acquisition	\$1,000,000	\$1,000,000
DCs	\$89,000	\$325,000
Council Fees	\$110,000	\$110,000
Professional Fees (10% of total costs)	\$560,000	\$560,000
Civils build costs	\$570,000	\$570,000
Vertical construction build costs	\$2,745,000	\$2,745,000
Sales and marketing fees (2% Development Value)	\$150,000	\$150,000
Contingency (10% of total costs excl. finance)	\$523,000	\$546,000
Finance (6.7% cost of capital)	\$94,000	\$100,000
Total	\$5,842,000	\$6,106,000

It has been assumed that the two-bedrooms are able to be sold for a market value of \$615,000 incl. GST and the three-bedrooms are able to be sold for \$675,000 incl. GST (in today's dollars). After accounting for the time taken to complete the homes (assumed to be 1.5 years from land acquisition to issuance of Code of Compliance) and assuming 5% house price escalation per annum, the homes could be worth \$662,000 incl. GST and \$726,000 incl. GST respectively. This results in total gross revenue of \$7.47m. After accounting for GST this drops to \$6.50m.

Revenue	Estimated value in 1.5 years' time	Number of homes	Total revenue
Two-bedroom	\$662,000 incl. GST	8	\$5,296,000 incl. GST
Three-bedroom	\$726,000 incl. GST	3	\$2,178,000 incl. GST
Total		11	\$7,474,000 incl. GST
Less GST			-\$974,869
Grand total revenue			\$6,500,000

Assuming projected market sales revenue remains unchanged at \$6.50 million, the cost increase due to increased DC's reduces the project's profit from \$658,000 (an 11.3% margin) to \$394,000 (a 6.5% margin), as detailed in the following development financial summary table.

Allowance	Current Development Contributions	Proposed Development Contributions
Estimated Gross Development Revenue (GDV)	\$6,500,000	\$6,500,000
Estimated Gross Development Costs (GDC)	\$5,842,000	\$6,106,000
Profit (GDV – GDC)	\$658,000	\$394,000
Profit on cost (%)	11.3%	6.5%

Absorbing the additional DC expense erodes already-narrow development margins, making affordable housing projects riskier and less financially viable. Alternatively, if a developer were to maintain a 10% profit margin—necessary to secure funding and justify the investment risk—the overall project value would need to rise to \$7.73 million (including GST). This translates to sales prices of \$685,000 (including GST) for the two-bedroom homes and \$752,000 (including GST) for the three-bedroom homes at the time of completion.

At these price points, a household earning the mean gross income in Christchurch (\$116,525 in today's dollars) would spend at least 33% of its income on household costs, exceeding the widely accepted affordability benchmark of 30%. To keep housing expenses within 30% of income under these higher prices, a household would need a gross annual income of \$128,000 for the two-bedroom homes and \$139,000 for the three-bedroom homes (in today's dollars). Even at the lower sales prices, those income requirements would still be \$124,000 and \$135,000 respectively—representing the challenges of delivering affordable housing even with current DC's.

Conversely, an appraisal was carried out to understand viability and affordability if no DCs were applied to this hypothetical development, using the original house prices as a reference point. In this scenario, the profit margin increases from 11.3% (current DC's) to 13.2%.

	Nil Development Contributions
Estimated Development Revenue excl. GST	\$6,500,000
Estimated Development Costs excl. GST	\$5,740,000
Profit (Development Value – Development Costs)	\$760,000
Profit on cost (%)	13.2%

Member case study (Cont)

If targeting a 10% profit on costs (the minimum threshold for securing bank finance), sales prices for completion could be reduced to \$642,000 (including GST) for the two-bedroom homes and \$705,000 (including GST) for the three-bedroom homes. Compared with the proposed DC rates, these figures represent a \$43,000 and \$47,000 saving for prospective buyers if both scenarios target a 10% profit margin.

Such findings highlight how increasing DCs undermines the original purpose of delivering affordable housing in Christchurch. Imposing higher DCs on affordable housing developments raises the risk of compromised viability, ultimately hindering the creation of genuinely affordable homes.

Policy must comply with Legislative basis for charging

It is important that any development contributions policy is aligned with the legislative basis for charging. The purpose of development contributions is set out in s 197AA of the Local Government Act as follows:

197AA Purpose of development contributions

The purpose of the development contributions provisions in this Act is to enable territorial authorities to recover from those persons undertaking development a fair, equitable, and proportionate portion of the total cost of capital expenditure necessary to service growth over the long term.

Section 199 sets out the circumstances which may give rise to a territorial authority requiring a development contribution from a developer. It provides:

199 Basis on which development contributions may be required

(1) Development contributions may be required in relation to developments if the effect of the developments is to require new or additional assets or assets of increased capacity and, as a consequence, the territorial authority incurs capital expenditure to provide appropriately for—

- (a) reserves;
- (b) network infrastructure;
- (c) community infrastructure.

(2) This section does not prevent a territorial authority from requiring a development contribution that is to be used to pay, in full or in part, for capital expenditure already incurred by the territorial authority in anticipation of development..

(3) In subsection (1), effect includes the cumulative effects that a development may have in combination with other developments

Section 197AB sets out the principles that must be taken into account when preparing a development contributions policy under s 106 or requiring development contributions under s 198.

Section 197AB(f) states:

197AB Development contributions principles

(1) All persons exercising duties and functions under this subpart must take into account the following

principles when preparing a development contributions policy under section 106 or requiring development contributions under section 198:

(a) development contributions should only be required if the effects or cumulative effects of developments will create or have created a requirement for the territorial authority to provide or to have provided new or additional assets or assets of increased capacity:

(c) cost allocations used to establish development contributions should be determined according to, and be proportional to, the persons who will benefit from the assets to be provided (including the community as a whole) as well as those who create the need for those assets;

(e) territorial authorities should make sufficient information available to demonstrate what development contributions are being used for and why they are being used

Development contributions under the LGA are in addition to, and separate from, financial contributions imposed as a condition of a resource consent under Section 108 of the Resource Management Act 1991 (RMA). Development contributions taken by the Council under the LTP relate directly to the assumed cost of development on current and future community facilities

Te Ture Whenua Māori Act 1993:

Section 102(3a) of the Local Government Act 2002 (LGA) requires Council policies, including the Development Contributions Policy, to support the principles set out in preamble to Te Ture Whenua Māori Act 1993.

The Preamble includes that the Crown should “...facilitate the occupation, development, and utilisation of that land for the benefit of its owners, their whānau, and their hapū.”

Clause 22, Part 4, Schedule 1AA of the LGA requires that development contribution policies be compliant by 1 July 2024.

Legislative basis for charging (cont.)

106 Policy on development contributions or financial contributions

(1) In this section, financial contributions has the meaning given to it by section 108(9) of the Resource Management Act 1991.

(2) A policy adopted under section 102(1) must, in relation to the purposes for which development contributions or financial contributions may be required,—

(a) summarise and explain the total cost of capital expenditure identified in the long-term plan, or identified under clause 1(2) of Schedule 13 that the local authority expects to incur to meet the increased demand for community facilities resulting from growth; and

(b) state the proportion of that total cost of capital expenditure that will be funded by—

(i) development contributions;

(ii) financial contributions;

(iii) other sources of funding; and

(c) explain, in terms of the matters required to be considered under section 101(3), why the local authority has determined to use these funding sources to meet the expected total cost of capital expenditure referred to in paragraph (a); and

(d) identify separately each activity or group of activities for which a development contribution or a financial contribution will be required and, in relation to each activity or group of activities, specify the total amount of funding to be sought by development contributions or financial contributions; and

(e) if development contributions will be required, comply with the requirements set out in sections 201 to 202A; and

(f) if financial contributions will be required, summarise the provisions that relate to financial contributions in the district plan or regional plan prepared under the Resource Management Act 1991.

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UDINZ

creating urban communities together

Contact Information:

Adrienne L Miller
Chief Executive Officer



www.udinz.nz

FEEDBACK ON THE DRAFT DEVELOPMENT CONTRIBUTIONS POLICY

27

ON BEHALF OF WINSTONE WALLBOARDS LIMITED

TO:

██████████ Senior Engagement Advisor
Christchurch City Council
PO Box 73011
Christchurch 8154

Feedback lodged by email – letstalk@ccc.govt.nz
██████████

FEEDBACK ON:

Draft Development Contributions Policy

FEEDBACK BY:

Winstone Wallboards Limited

FEEDBACK ADDRESS:

Winstone Wallboard Limited
PO Box 1983
Christchurch 8140

Please note the different address for service on page four

A: INTRODUCTION

1. Winstone Wallboards Limited (**WWB**) hereby provides feedback on the draft Development Contributions Policy (**DDCP**).
2. **WWB's** feedback is broadly organised as follows:
 - a. **Summary of WWB's feedback**
 - b. **Statement of Interest and Background**
 - c. **Feedback on the Draft Development Contributions Policy**
 - d. **Summary of relief sought**
 - e. **Conclusion**

B: SUMMARY

3. WWB opposes the following aspects of the Draft Development Contributions Policy:
 - i. **Opposes** the assessment of the '**Household unit equivalent**' for non-residential developments by land use and activity as set out in **Table 4**, in particular that the definitions of activities are not aligned with the Definitions contained in the District Plan or proposed by Draft Plan Change 20: Industrial Interface
 - ii. **Opposes** the requirements for a Special Assessment where a development is 'non-consistent' under the applicable District Plan zone but is approved through a resource consent process and **seeks further clarification** on how 'non-consistent with the District Plan' is assessed/determined.
 - iii. **Seeks amendments** to the definitions used for the assessment of non-residential HUE equivalents by land use and activity which should be consistent with the District Plan definitions.
 - iv. **Opposes** the removal of the requirement **Clause 5.6** which removes the ability of developers to seek remission or reduction.
 - v. **Seeks justification** on the Three Waters requirement for a 50% reduction of demand through on Council infrastructure through onsite mitigation and that such an assessment should either be on a case-by-case basis or set a lower threshold.

C: STATEMENT OF INTEREST AND BACKGROUND

Nature of the Operation

2. WWB is New Zealand's only manufacturer and largest marketer of gypsum plasterboard, drywall systems, associated GIB® products and services. WWB has multiple locations throughout New Zealand, including the Christchurch manufacturing and distribution centre at 217 - 219 Opawa Road, Christchurch. The Opawa Road site is the only site within the South Island that produces GIB® plasterboard products, with a second North Island GIB® production plant in Tauranga. Therefore, the Opawa Road site is of vital importance to the provision of a key building product in the South Island.

Infrastructure Demand

3. WWB are committed to protecting the environment in a number of ways, including reducing the demand on Council infrastructure. In particular, WWB is highly conscious of the GIB® plasterboard manufacturing process, which requires a significant volume of water to mix with plaster to form the board. However, to ensure that the water resource is used effectively and efficiently, all site manufacturing process waste and wash water is collected on-site, stored in large tanks, passed through a solids separation process and then blended with fresh water before being fed back into the manufacture of new GIB® Plasterboard.
4. As a result, all water onsite used within the trade production and process system is largely recycled and directed back into the manufacturing process or released as steam, with no resultant wastewater entering into the Council wastewater network that relates to the industrial process onsite.

Contribution to the local and national economy

5. WWB employs over 80 local staff and over 300 employees nationally and plays an importance role in the both the Canterbury and New Zealand economy, through both its international and domestic partners to improve building products, systems and solutions.

D: FEEDBACK ON THE DRAFT DEVELOPMENT CONTRIBUTIONS POLICY

6. WWB has provided feedback on DDCP relating to the following matters:
 - i. *The assessment of the 'Household unit equivalent' for non-residential developments*
 - ii. *Introduction of 'Special Assessments'*
 - iii. *Definitions*
 - iv. *Removal of the ability to seek a remission*
 - v. *The requirement for a development to provide more than a 50% reduction on demand to be eligible for a reduction*
7. Feedback on each of these matters is provided below.

D.1 The assessment of the 'Household unit equivalent' for non-residential developments

8. **Table 3** of the 2021 **DCP** provides the assessment for 'Household unit equivalent' (**HUE**) for non-residential developments by what District Plan Zone the development is located within.
9. This provides certainty for developers on how they will be assessed depending on their spatial location within the District Plan zoning framework.
10. Under the Draft DCP however, the HUE for non-residential developments is now assessed on land use and activity. However, WWB considers that the introduction of the land use and activity does not provide a level of certainty to certain operators, particularly where a development, such as the WWB Opawa site, falls under more than one of the land use and activities listed in **Table 4** of the

Draft DCP. For example, WWB has commercial premises/offices AND mixed business & industrial warehousing AND manufacturing industries.

11. As currently drafted, it is not clear how Table 4 will be applied to a development that contains more than one of the land use and activities on site.
12. WWB considers that the new assessment methodology may result in less and greater complexity to the calculation for non-residential developments.
13. Therefore, WWB **opposes** the new methodology and seeks that further clarification is provided, particularly for mixed use non-residential developments.

D.2 Introduction of 'Special Assessments'

14. Section 3.2.4 states that:

*"Where a development is **not consistent with the land use expected under the applicable zone in the District Plan** or if the demand on any infrastructure for which a development contribution is levied is expected to be significantly different than the average for the applicable zone, the Council may require a special assessment for development contributions for the activities considered to be outside the expected demand" (**emphasis added**)*

15. WWB is concerned with how Council will assess a development '**not consistent with the land use expected under the applicable zone in the District Plan**'.
16. It is not clear whether 'non consistent' would be a development that is not a permitted activity, or where a development is a non-complying or prohibited activity. Moreover, where a development is established through Resource Consent, irrespective of whether it was 'anticipated by the zone' it is not clear whether such a development still trigger a Special Assessment.
17. What is also not clear is where a 'Special Assessment' is carried out, would this incur additional processing costs.
18. Furthermore, the Industrial Interface Plan Change (DPC20), which potentially reduces the level of permitted activities with the Heavy Industrial Zone, may result in WWB being inadvertently captured by the term 'non-consistent' under the applicable District Plan zone, particularly 'non-consistent' means anything that is not a permitted activity.
19. Therefore, WWB **opposes** the requirements for a Special Assessment where a development is 'non-consistent' under the applicable District Plan zone but is approved through a resource consent process and **seeks further clarification** on how 'non-consistent with the District Plan' is to be assessed/determined.

D.3 Definitions

20. The draft policy introduces definitions for the following:
 - **Industrial** means the use of land, infrastructure and buildings for the manufacturing, fabricating, processing, packing or storage of goods, substances, energy or vehicles; the servicing and repair of goods and vehicles whether by machinery or hand; or any other similar activities.

- **Manufacturing industries** means the use of land and/or buildings for manufacturing, processing, servicing and repair activities. It includes the activities set out in Division C: Manufacturing in the Australian and New Zealand Standard Industrial Classification (ANZSIC).
 - **Mixed business and industrial warehouse** means the use of land and/or buildings for manufacturing, processing, servicing and repair activities
20. These definitions above, which are used in **Table 4. Summary of residential and non-residential HUE equivalents by land use and activity** do not align with the District Plan definitions and are also not aligned with the definitions proposed by drafted in Plan Change 20: Industrial Interface.
21. WWB considered there is a lack of integration between the Draft DCP and the District Plan, which will result in inconsistent assessments, particularly for non-residential developments.
22. WWB therefore **opposes the definitions** of **Industrial, manufacturing industrials** and **Mixed business and industrial warehouse** contained within the draft DCP and seeks they be redrafted to ensure consistency with the District Plan definitions.

D.4 Removal of the ability to seek a remission

23. WWB considers that the continuation of the 2021 Development Contributions Policy provision for developers to request a remission/reduction in their development contribution charge where there were "unique and compelling" would be entirely appropriate.
24. Accordingly, WWB consider that preventing developers to have the opportunity to seek remission or reduction due to special mitigating circumstances under **Clause 5.6** is misaligned with other Council's such as Selwyn District Council which provides for a developer to request a remission of a development contribution required on a development.
25. Therefore, WWB **opposes** the removal of the requirement **Clause 5.6** and considers that the ability of developers to seek the remission or reduction should be retained as set out in the 2021 DCP.

D.5 The requirement for a development to provide more than a 50% reduction on demand to be eligible for a reduction

26. With respect to the requirement for Three Waters (Stormwater, Wastewater, and Water Supply) WWB considers that the requirement for a development to reduce the overall stormwater discharge demand on the Council's system by more than 50% to be eligible for a reduction in stormwater development contribution is too high a threshold and is not adequately justified. It is also not clear whether the reduction is sought is on a peak flow basis.
27. Given the size of most industrial sites, the requirement to provide on-site retention provisions is too onerous and therefore the eligibility for a reduction based on this requirement is unworkable.
28. WWB considers that reductions should be assessed on a case-by-case basis, or otherwise a lower threshold established.
29. Therefore, WWB **seeks justification** on the Three Waters requirement for a 50% reduction of demand through on Council infrastructure through onsite mitigation and that such an assessment should either be on a case-by-case basis or set a lower threshold.

F: CONCLUSION

30. WWB wishes to thank Christchurch City Council for the opportunity to provide feedback on the Draft DCP.

Feedback signed for and on behalf of Winstone Wallboards Limited

[REDACTED]
Jacqui Hewson
Senior Consultant Planner

[REDACTED]
Resource Management Group Limited

26 March 2025

Address for Service:

Winstone Wallboards Limited
C/- Resource Management Group Ltd
PO Box 25 175
WELLINGTON 6140



Christchurch City Council
Draft Development Contributions Policy 2025

**Submission by Bupa Care Services Limited
(Bupa)**

26 March 2025

SUBMISSION ON THE DRAFT DEVELOPMENT CONTRIBUTIONS POLICY 2025 BY BUPA CARE SERVICES LIMITED (Bupa)

To: Christchurch City Council

Name of submitter: Bupa Care Services Limited (*Bupa*)

INTRODUCTION

- 1 This is a submission on Christchurch City Council's (*Council*) draft Development Contributions Policy 2025 (*2025 Draft Policy*).
- 2 Bupa welcomes this opportunity to provide feedback on the 2025 Draft Policy.
- 3 Bupa acknowledges the importance of development contributions (*DCs*) for funding infrastructure and facilities needed for Christchurch's growth and development. Bupa seek that the 2025 Draft Policy adopts a fair, equitable and proportionate scheme for retirement villages and care homes.
- 4 Bupa supports the submission by the Retirement Villages Association of New Zealand (RVA) and the key points in that submission that:
 - 4.1 Further investigate if all the infrastructure projects covered in the 2025 Draft Policy are needed to service amended lower growth projections.
 - 4.2 Align work with central government's proposed new development levy regime.
 - 4.3 Amend special assessment requirements to allow for developers in any circumstances where evidence is provided that a development is substantially less than the assumed demand.
- 5 If further discussion is progressed on this matter, Bupa would like to part of any discussions with the Retirement Village Association of New Zealand.
- 6 This submission covers:
 - 6.1 An introduction to Bupa; and
 - 6.2 Bupa's submission on the 2025 Draft Policy.

BUPA

- 7 Bupa is an international healthcare company, with its NZ business developing, owning and operating retirement villages and care homes across the country. Bupa has 37 retirement villages and 40 care homes across New Zealand. Within Christchurch City, there are four Bupa facilities, these are Cashmere View, Parkstone, Parklands and Bethesda. Parkstone, in Ilam is currently undergoing the final stage of development. Bupa's villages and care homes provide a safe and secure living environment that support the healthcare needs of their residents. Bupa villages enable residents to live in a like-minded community where individual

health and wellbeing needs can be met onsite. As a healthcare company, providing care is at the heart of Bupa's core strength and perfectly aligns to its global purpose which is for its customers to live longer, healthier and happier lives.

- 8 Bupa retirement villages attract people with higher care requirements than the industry average, with the current age of entry at just over 80 years. The minimum age for entry to a Bupa retirement village is 70 years. The occupancy rate for a retirement village is 1.3 persons, and the occupancy rate for a care home is 1.0.
- 9 Due to the higher age in Bupa villages, a higher level of on-site amenities is provided to support the age and stage of the demographic. Villages typically have a community centre, gym, recreation facilities (e.g. croquet or bowls), café, sometimes a swimming pool, cinema, hair salon and a wellness centre.
- 10 Bupa is considering investing in Christchurch through the re-development and expansion of existing facilities or the purchase of new sites. Having certainty that development contributions will be proportionate to the very low demand villages have on services will better enable the financial investment required for new development in the city.

BUPA'S CONCERNS ABOUT THE 2025 DRAFT POLICY

Summary

Bupa's key concerns about the 2025 Draft Policy relate to:

- *Units of demand for retirement units and aged care rooms are not proportionate in relation to wastewater and water supply:* The units of demand are based on the population of retirement units and aged care rooms and do not reflect the significantly lower demand that Bupa retirement village residents place on wastewater and water supply.

Change sought: Amend the units of demand for retirement units and aged care rooms to reflect the demand created by retirement villages.

- *Uncertainty as to whether non-residential units of demand apply to retirement villages:* The units of demand for retirement units and aged care rooms (as sought above) account for all of the demand created by retirement villages for community facilities. Additional charges are not proportionate or equitable.

Change sought: Clarify that non-residential units of demand do not apply to retirement village community facilities.

Units of demand for retirement units and aged care rooms

- 11 Bupa supports the identification of 'retirement units' and 'residential care room' as specific development types in the 2025 Draft Policy.

Units of demand reflect occupancy rates

- 12 Bupa's retirement units have an average occupancy of 1.3 people and aged care rooms having an occupancy of 1 person. Bupa supports units of demand that reflect occupancy rates but considers the units of demand also need to reflect actual demand characteristics as detailed below.

Water and wastewater

- 13 Due to their age and health status, the residents of Bupa retirement units and aged care rooms have a reduced demand on community infrastructure and facilities. Bupa notes that research by the Retirement Village Association (RVA) also indicates that retirement village units and aged care rooms use much less water and produce much less wastewater per person than a standard household unit.
- 14 Bupa agrees with research by RVA that the demand created for water and wastewater is 260 L/day and 208 L/day for retirement village units and 200 L/day and 160 L/day for aged care units respectively.
- 15 Bupa supports the submission of the RVA and requests amendments to the unit of demand to (rounded up to two decimal points):
- 15.1 Retirement unit
- 0.4 (for water and wastewater)
- 15.2 Residential care suite
- 0.3 (for water and wastewater)

Stormwater

- 16 Bupa supports retaining the approach that development contributions for stormwater from a retirement village are based on the impervious surface area of a development.

Transport-related

- 17 Bupa **supports** retaining the transport related units of demand in the 2025 Draft Policy for:
- 17.1 Retirement unit: 0.3.
- 17.2 Residential care suite: 0.2.

Community infrastructure

- 18 Bupa **supports** retaining the community infrastructure related units of demand in the 2025 Draft Policy for:
- 18.1 Retirement unit: 0.1.
- 19 Bupa requests that Table 4 is clarified that the community infrastructure unit of demand for care suites is 'Nil'. The respective column in Table 4 is blank and there is no related footnote.

Clarify that non-residential building charges do not apply to retirement villages

- 20 Bupa seeks clarification that non-residential development charges do not apply to retirement village community facilities and other buildings.
- 21 Bupa therefore supports the following amendment to Table 4 of the 2025 Draft Policy (to be added as a new footnote):

Any non-residential buildings/structures within a retirement village for the predominant use of residents and their guests are not subject to development contribution fees.

- 22 Bupa appreciates the opportunity to submit on the 2025 Draft Policy.

Richard Stephenson

Property Director
Bupa NZ

Contact details:

Bupa Care Services Limited
[REDACTED]

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 26/03/2025

First Name: (required) Ross

Last Name: (required) McFarlane

Name of Organisation/business:

Ensure you have the authority to submit

Halswell Residents Association

Your role: (required) Executive Committee

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Catchments for Neighbourhood Parks and Road Network activities

Catchments for Neighbourhood Parks Road Network activities

You can read more about this on our [Let's Talk](#) page.

1.2.8

What do you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

Refer next question on this.

1.2.9

What don't you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

We would prefer more localised catchments that align directly with where development is occurring.

2.1

Overall, do you support the Development Contributions Policy Review?**Required**

Somewhat

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

In support of the more localised catchments we desire and as a large growth area of Christchurch we find DCs do not invest collections back into a known area of households and population growth.

Our specific concerns are Community Infrastructure and Neighborhood parks sections of the DC policy.

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 26/03/2025

First Name: (required) Terry

Last Name: (required) Foote

Name of Organisation/business:

Ensure you have the authority to submit

Roman Catholic Bishop of the Diocese of Christchurch

Your role: (required) Project Manager - Property

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Fee for development contributions assessments

Fee for development contributions assessments

You can read more about this on our [Let's Talk page](#).

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

That the Council is considering options.

1.2.17

What don't you like about our recommended policy position on the Fee for development contributions assessments?

That the current policy is that existing demand credits expire after 10 years.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Yes

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

Please see our attached submission.

Attached Documents

Name
Devpt Policy Contributions Review TF - 25.3.25

26 March 2025

**Christchurch City Council - Development Contributions Policy Review
March 2025**

Submission prepared by the Catholic Diocese of Christchurch on behalf of:

The Roman Catholic Bishop of the Diocese of Christchurch (Corporate sole) being Michael Andrew Gielen (The Bishop)

Affected properties include:

62 Ferry Road
122 Barbadoes St
Block of land bordered by Colombo St, Armagh St, Manchester St, Oxford Terrace

Submission Topic: Existing Demand Credits

Our Preferred Option in order

New - Allow specific exemptions for not-for-profit organisations where circumstances warrant it, based on information provided and analysis by Council Staff.

Or secondly

(C) Provide an indefinite life of existing demand credits

Or thirdly

(B) Extend the life of existing demand credits

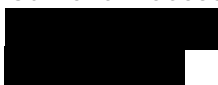
Credits could be extended to **20 years**. This would result in some loss of revenue for the Council but not as much as an indefinite life of credits, depending on where the life of credits was extended to.

Inquiries to be directed to:

Terry Foote

Project Manager – Property

Catholic Diocese of Christchurch



Thanking you for considering our submission. We would like to take the opportunity to meet with the Hearings Panel to discuss our submission which focuses on the construction of our new Cathedral plus Parish churches. If available Bishop Michael would wish to address the Hearings Panel.

Submission – Executive Summary

We note from the explanation of the review provided by Christchurch City Council the following comment:

“The policy sets out the methodology used to recover the cost incurred by Council for providing growth infrastructure from those who benefit from the provision of that infrastructure, **such as private developers.**”

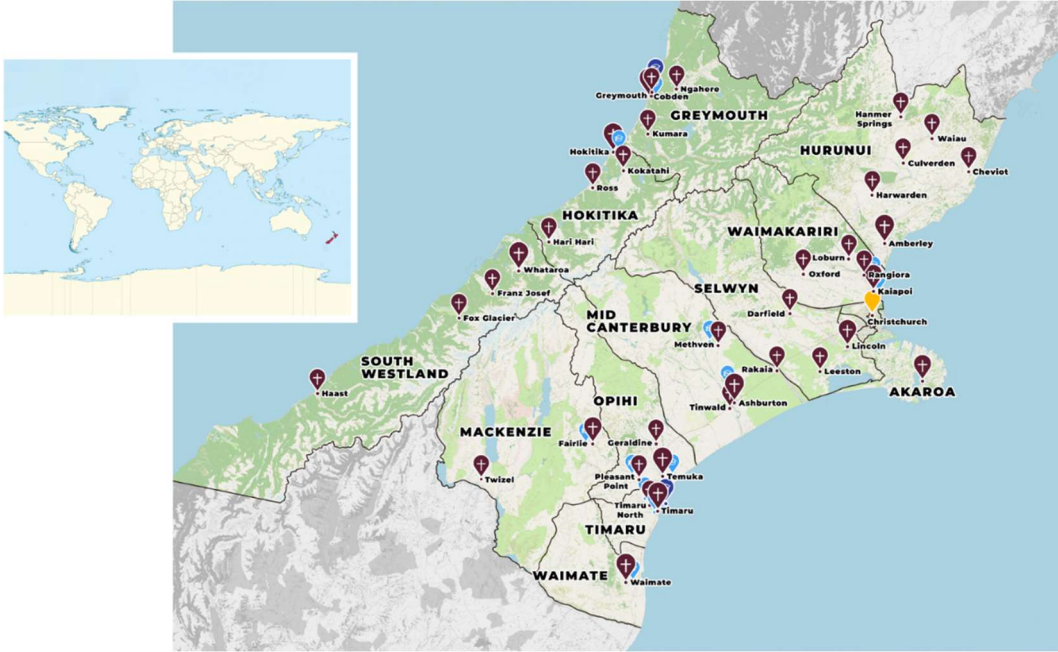
This is the essence of our submission; the Bishop is not a private developer in regards the construction of a new Cathedral. Rather Bishop Michael is the representative of a local church that has ministered in Christchurch since at least the 1860s, our first church being built in Lyttelton in 1865. In Christchurch and the wider Diocese our ministry includes:

- Parish life
- Integrated Catholic primary and secondary schools
- Youth Outreach
- Cultural communities
- Hospital Chaplains
- Prison Chaplains
- Catholic Social Services
- Tertiary chaplaincy

Furthermore, Bishop Michael is the representative of the Roman Catholic Church which traces its roots back 2000 years and has developed and evolved a code of practices, known as Canon Law, which must be followed by the Bishop, just as the Bishop must follow the Common Law of New Zealand. Canon Law has evolved over the centuries and provides a global set of rules to run a church with over 1.4 billion members. As would be expected, matters of Canon Law can slow down processes within our church for good reason, however the Canon Law must be adhered to, as for New Zealand Common Law.

In addition, the Bishop is not only responsible for the Diocese including matters regarding the Cathedral but also oversees all the currently 18 individual Parishes within his Diocesan territory which includes Canterbury and the West Coast south of Ngahere to Haast.





It is the prayerful hope of Bishop Michael that our new Cathedral will be a worthy monument to God for generations to come. Indeed, this will be the first Catholic Cathedral built in New Zealand for 120 years. The Cathedral will be centre of unity for our Diocese, it will be the home of beautiful liturgy, and it will be the “home base” from which people are sent out to love God and love their neighbour.

This desire comes at a significant cost which will only be met in part by insurance proceeds. The remaining portion will be principally from fundraising. The loss of existing development contributions and a potential tripling of charges from 2021 levels would have a massive detrimental effect on our budgets and significantly increase an already large fundraising programme.

Post the Earthquakes

Since the earthquakes our Bishops have had to provide careful and detailed stewardship of the resources within our Church. Following the Christchurch earthquakes our Diocese has been faced with the following:

TE TAKIWÄ Ō TE PIHOPA



Image: The Cathedral of the Blessed Sacrament, pre & post earthquake (source: CDOC)

Damage to the Diocese

CHURCHES & SCHOOLS



37

34 Churches, Cathedral
& 2 Schools structurally
damaged



10

7 churches, Cathedral &
2 schools permanently
demolished



21

18 Churches repaired
& 3 rebuilt with insurance
proceeds



6

6 churches awaiting
demolition or remain
closed 13 years on

The resources of the Church have had to be allocated wisely to ensure the continuing function of particularly our Parishes and Schools. As can be seen, there has been much achieved. However, there is still much to finish for a charitable organisation as the Roman Catholic Diocese of Church is.

We will present below a series of events from the Greendale earthquake of 10 September 2010 which started the swarm of earthquakes culminating in the last major earthquake on 23 December 2011.

This series of events, including adherence to Canon Law and mostly out of our control, has contrived to cause delays towards the construction particularly of our new Cathedral to replace the former Cathedral of the Blessed Sacrament on Barbadoes Street. We have titled it 14 years of uncertainty. It is for this reason that we are submitting a review of the existing demand credit policy regarding the options outlined above.

The delays have certainly not been a "land-banking". In fact, the Diocese has been faced with many extra costs including the Christchurch City Council "City Vacant Differential" rate, which is a multiplier of the standard general rate, and has more than doubled the existing rating of our Armagh St block of land. We have implemented considerable improvements to what are currently carparking sites for the inner city.



Timeline since 2010

In summary

14 Years of Uncertainty

2010 - 2023

2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024 - 2026
Emergency Response		Restoration			Reconstruction (three churches rebuilt using insurance proceeds)									Improvement
Sept. Earthquake	Feb. Earthquake	"Provision for Sunday Mass" Repairing churches for reentry, demo where required.				+ Barry Jones DD RIP		+ Paul Martin SM Appointed	Masque Shootings Commencement Consultation for parish amalgamations	Parish amalgamations decrees issued	+ Paul Martin SM appointed Coadjutor Archbishop of Wellington	+ Michael Gielen Appointed	Rome Recourse	Improving our Diocese

In more detail

4 September 2010 - magnitude 7.1 earthquake. First in series. Rendered Cathedral of Blessed Sacrament unusable.

22 February 2011 – magnitude 6.3 – Devastating earthquake -185 deaths and extensive damage.

13 June 2011 – magnitude 6.3 - Further building and land damage from liquefaction and major rockfalls around the Port Hills.

23 December 2011 – magnitude 5.8 and 6.0 – felt widely across Canterbury

These four earthquakes created 4 separate natural disasters which in turn created 4 separate events for insurance purposes. The impacts of each were felt differently across the Diocese.

2011 – 2014 – This was initially a period of restoration led by our Bishop Barry Jones. Bishop Barry prioritised the provision of our beloved Sunday Mass, by repairing churches for reentry or demolition where required.

2015-2023 – This can be categorised as a period of reconstruction with 3 parish churches rebuilt using a mixture of insurance proceeds, fundraising and parish and diocesan resources.

- New Brighton - As the East of Christchurch was so hard hit, this was a priority.
- Lincoln



- Pleasant Point

13 February 2016 – Death of Bishop Barry Jones

Under Canon 391 §1, it is for the diocesan bishop to govern the Diocese entrusted to him with legislative, executive, and judicial power according to the norm of Canon law.

Each Bishop has the power to reassess the direction of the Roman Catholic Church within his Diocese and to make changes as may be allowed under Canon Law. As outlined above and below the Diocese of Christchurch has had 3 different Bishops since 2010.

For the two years until the appointment of a new Bishop, our Diocese was overseen by an Apostolic Administrator. The administrator oversees the business and financial operations of the Diocese including overseeing facility maintenance and security, helping prepare an annual budget, paying bills, filing documents, and managing inventory. The Apostolic Administrator cannot set new direction for the Diocese, such as the building of a new Cathedral.

3 March 2018 – Installation of Bishop Paul Martin.

1 December 2019 – After 18 months of consultation and consideration Bishop Paul outlines his vision for the whole diocese, “Our Faith, Our Future” and proposes a change to the structures of parish life to better proclaim the good news of Jesus Christ to the whole world. As the Bishop notes in his pastoral letter, the diocese is in a unique position due to the earthquakes. They have brought with them many challenges, but they have also given us the opportunity to rethink our buildings and structures to better serve our core mission. In summary, Bishop Paul is proposing to create five new parishes in Christchurch City amalgamated from the existing 12 parishes. This is a very significant change for Roman Catholics living in Christchurch.

December 2019 – Bishop Paul Martin made public plans for a new cathedral site, Catholic primary school, hotels, offices and a carpark, all in community and commercial collaboration with Ōtākaro Limited on the Armagh Street block.

28 February 2020 – mid October 2022 – COVID-19 Pandemic in New Zealand, causing significant impact on Parish amalgamation planning and Diocesan life in general with lockdowns, mandates etc.

31 May 2020 – New Parishes instituted during COVID-19, as legal and canonical paperwork had been prepared.

1 January 2021 – Bishop Paul appointed coadjutor bishop of the Archdiocese of Wellington. From this point, Archbishop Paul became the Apostolic Administrator of the Diocese of Christchurch with his powers confined as above. This administration period continued until July 2022 when Bishop Michael was appointed Bishop of Christchurch, so approximately 18 months.

July 2022 – Bishop Michael Gielen appointed as Bishop of Christchurch.



Early 2023 – A group of parishioners lodged a canonical legal challenge following the 2019 merger of Christchurch parishes. As a result, Bishop Michael directed the city's parishes to pause planning the future of their buildings and paused the diocese's project to build a new Cathedral.

29 October 2023 – Clarity was received from Rome as to the Parish for which the canonical legal challenge was relevant. Bishop Michael announced that a Cathedral update would be made before the end of 2023.

10 December 2023 – After prayerful consideration, Bishop Michael announced a period of consultation and discernment to consider the site for the Cathedral to be constructed.

20 April 2024 – Bishop Michael announces that the new Cathedral will be built on land owned at Barbadoes St, the site of the Cathedral of the Blessed Sacrament. 85% of survey respondents expressed that location as their preference.

July 2024 After further consultation and discernment Bishop Michael announces the new Cathedral will be named the Cathedral of the Blessed Sacrament as per its predecessor.

From August 2024 The process for the development of the new Cathedral has commenced including:

- Cathedral Control Group established.
- Internal Cathedral Project Director appointed.
- Client facing External Project Manager appointed.
- Quantity Surveyor.

March 2025

In addition to the planning for the new Cathedral, 5 of our Parishes are planning to construct new Churches, including 2 within the Christchurch City Area. We would request their properties at Hoon Hay and Papanui be considered as part of our submission also.

Summary

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 ½ 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 ½ years.

Although the current policy for existing demand credits to expire after 10 years may be appropriate for a private developer and others of similar nature, for an organisation such as the Roman Catholic Bishop of the



Diocese of Christchurch (Corporate sole) being Michael Andrew Gielen (The Bishop) it is not as per the circumstances outlined. We know this time frame has also been impracticable for other organisations.

We therefore request again regarding:

Submission Topic: Existing Demand Credits

Our Preferred Option in order

New - Allow specific exemptions for not-for-profit organisations where circumstances warrant it, based on information provided and analysis by Council Staff.

Or secondly

(C) Provide an indefinite life of existing demand credits

Or thirdly

(B) Extend the life of existing demand credits

Credits could be extended to **20 years**. This would result in some loss of revenue for the Council but not as much as an indefinite life of credits, depending on where the life of credits was extended to.

Thank you very much for your consideration of our submission. As above we wish to take the opportunity to meet the Hearings panel of the Christchurch City Council and speak to the decision makers.

Yours faithfully



Terry Foote
Project Manager – Property
Catholic Diocese of Christchurch



Development Contributions Policy Review 2025

Submitter Details

Submission Date: 26/03/2025

First Name: (required) Lucy

Last Name: (required) de Latour

Name of Organisation/business:

Ensure you have the authority to submit

Cambridge 137 Limited

Your role: (required) Solicitor for Cambridge 137 Limited

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Remission provision

Remission provision

[You can read more about this on our Let's Talk page.](#)

1.2.6

What do you like about our recommended policy position on the remission provision?

See attachment

1.2.7

What don't you like about our recommended policy position on the remission provision?

See attachment

2.1

Overall, do you support the Development Contributions Policy Review?

Required

No

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

See attachment - including feedback on existing demand credits

Attached Documents

Name
DC policy submission - Cambridge 137 Limited(10152420.2)

SUBMISSION ON CHRISTCHURCH CITY COUNCIL DRAFT DEVELOPMENT CONTRIBUTIONS POLICY 2025

Summary

1. Cambridge 137 Limited (**Cambridge 137**) strongly considers that the proposed Christchurch development contributions policy (**pDCP**) should be amended to either extend the term for the existing demand credits or provide an exception to the 10-year limit for buildings which were affected by, and have not been developed since, the Canterbury Earthquake Sequence (**CES**) (i.e. Option B in the Council's consultation material or a modified version of it).
2. Ensuring that existing credits apply to buildings that were affected by and have not been redeveloped since the CES will provide incentives for developers to address and redevelop these sites. Encouraging the redevelopment of these sites is in the wider public interest to promote the ongoing re-development of Christchurch.
3. The Council's proposal not to revisit the timeframe in which existing demand credits apply has been further compounded by the proposed removal of the ability to seek remissions of development contributions. This effectively means that there is no avenue for seeking a reduction in development contributions (other than special assessments) for buildings damaged in the CES which remain a barrier to regeneration.

Background

4. 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.
5. 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.
6. Under the current 2021 Development Contributions Policy, no existing demand credit is available to Cambridge 137 for the existing building on the site because it is more than 10 years since the building last exerted demand on infrastructure.
7. Given, that is it now over 14 years since the earthquakes, existing demand credits for any buildings which were damaged through the CES and unoccupied since then no longer apply. Many of those properties 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.
9. Although the building has sat vacant and in a deteriorated state for over 10 years, this was primarily due to a delay in insurance settlement which wasn't completed until 2016. Following settlement, in 2017, the owners (at the time) applied for a resource consent but the application was not pursued. The site was sold to Cambridge 137 in 2023. Following sale, Cambridge 137 swiftly applied for a resource consent which has now been granted.
10. We strongly consider the Council should give recognition to the importance of developing sites like the Harley Chambers site for the city's growth by applying the existing development credit as an incentive for redevelopment.

The wider issue and public interest

11. Similar issues will be faced in relation to other buildings damaged by the CES. These buildings are now no longer eligible for the existing demand credit as they have been the subject of elongated insurance proceedings, or have otherwise not been viable to redevelop at this time.
12. These buildings 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.
13. 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 are incentives to develop these sites, particularly in the central city.
14. Further, as was acknowledged when the Council last looked at this issue in 2021, at least so far as the central city is concerned:
 - (a) A significant proportion of previously developed sites in the central city remain vacant since being cleared of earthquake damaged development.
 - (b) Infrastructure in the immediate area largely has growth capacity.
 - (c) Allowing for demand credits for a longer period of time might encourage (or at least not discourage) development in the central city.
15. While extending the period in which existing demand credits apply will have an impact on development contribution revenue, the Council's consultation material provides no acknowledgement of the increased rating revenue that would follow from the redevelopment of some of the remaining barrier sites.
16. Putting in place, say, a 20 year period for demand credits to apply would incentivise redevelopment to occur within the next 6 years to take advantage of the remaining credit.
17. Having a longer period in which the credit applies would not out of step with other districts in New Zealand, where, in some instances, credits have an indefinite life.
18. Cambridge 137 considers that the current development contribution policy does not provide any incentive or acknowledgement for unique circumstances that apply to the redevelopment of earthquake damaged properties and the public interest which exists for the redevelopment of such sites. The pDCP does not remedy this issue.

Compounding effect of removing ability to seek remissions

19. The pDCP further compounds these issues by proposing to remove the ability to seek remissions of development contributions. This effectively means that there is no avenue for seeking a reduction in development contributions (other than special assessments) for buildings damaged in the CES which remain a barrier to regeneration.

Relief Sought

20. The Christchurch City Council has specifically invited, as part of the pDCP process, submissions on the existing credit discount settings in the pDCP. The Council suggests four options for the pDCP:
 - (a) Retain the current policy setting;
 - (b) Extend the life of existing demand credits;
 - (c) Provide an indefinite life of existing demand credits; or
 - (d) Do not provide existing demand credits.

21. For the reasons set out above, Cambridge 137 strongly supports the adoption of option (b). In light of the unique circumstances facing the city, it considers that a 20 year credit should apply to ensure the existing credit covers buildings affected by the CES which have not been redeveloped yet. This would address the issues identified above and would ensure proper recognition and incentives for the redevelopment of these sites.
22. Alternatively, the Council could adopt an exception to the limitation on the 'life' of existing demand credits for properties/ sites which were affected by the CES and have not been redeveloped since, or otherwise limit the 20 year life for credits to the Central City only. Either of these exceptions would be a more targeted approach to addressing the issue.
23. Cambridge 137 also seeks the reinstatement of the ability to seek remissions of development contributions.

Presentation

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

Michael Doig and Jonathan Lyttle
Directors Cambridge 137 Limited

26 March 2025

Submitter: Cambridge 137 Limited

Address for service: Wynn Williams

[REDACTED]

[REDACTED]

Email:

[REDACTED]

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 26/03/2025

First Name: (required) Nicki

Last Name: (required) Carter

Name of Organisation/business:

Ensure you have the authority to submit Carter Group Limited

Your role: (required) General Counsel

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Remission provision

2.1

Overall, do you support the Development Contributions Policy Review?

Required

No

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

We don't support the policy of charging development contributions on developments on vacant central city sites. Those sites had buildings on prior to the earthquakes and they paid for the infrastructure and maintenance of infrastructure through rates over many years. No additional infrastructure is required for developments in the central city and to charge development contributions on sites that previously had buildings located on them is double dipping.

The council also should be encouraging development and the rates uplift through development, and the economic benefits development brings to the city and the region. The policy should be viewed through that lens.

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 26/03/2025

First Name: (required) Rebecca

Last Name: (required) Wolt

Name of Organisation/business:

Ensure you have the authority to submit P D Sloan

Your role: (required) Advisor/representative

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustment Large residential unit adjustment Remission provision

Catchments for Neighbourhood Parks and Road Network activities Catchments for Three Waters activities

Stormwater reductions for developer provided infrastructure Removal of multi-unit adjustment for stormwater

Fee for development contributions assessments Land in lieu of cash development contributions

Household unit equivalent (HUE) multipliers update

2.1

Overall, do you support the Development Contributions Policy Review?

Required

No

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

Please see attached submission and accompanying report by Abley

Attached Documents

Name	
PDS Property_CCC Draft DC 2025_Abley Report	
SUBMISSION ON CHRISTCHURCH CITY COUNCIL DRAFT DEVELOPMENT CONTRIBUTIONS POLICY 2025	

Christchurch City Council Draft Development Contributions Policy 2025

Ferrymead Mitre 10 MEGA Extension Review

Prepared for	PDS Property
Project Number	PDS-J002
Revision	B
Issue Date	15 March 2025
Prepared by	Logan Copland, Principal Transportation Planner
Reviewed by	Steve Abley, Chief Executive

1. Introduction

Abley Limited (Abley) was engaged by PDS Property Limited (PDS) to review the Christchurch City Council (CCC) Draft Development Contributions (DC) Policy 2025 (the draft Policy). This technical note describes a review of the draft Policy against PDS's recent Mitre 10 MEGA Extension in Ferrymead, Christchurch. It sets out the following:

- Background of CCC and DCs, and the Ferrymead development
- An overview of how the draft Policy works
- An assessment of what the DC charge would be if the Ferrymead development was assessed against the draft Policy
- A case study that assesses a theoretical DC charge scenario of a 5,000m² standalone retail development on the site (adjacent to the Mitre 10 MEGA Ferrymead building) if assessed against the draft Policy. It then compares that to a scenario where the same development is also assessed against the 2021 Policy (the current DC Policy).

1.1 Background

CCC and DCs

DCs are collected to fund infrastructure required to support growth. Christchurch City Council (CCC) has had a DC policy since 2004¹. The current DC Policy was adopted in 2021 and is due for review². The draft Policy was adopted by Council for consultation on 19 February 2025, consultation closes 26 March 2025 with hearings to follow in April 2025. A decision on the final policy will be made in June 2025.

¹ <https://letstalk.ccc.govt.nz/DevelopmentContributions>

² The draft Policy, pp6, sets out that the Local Government Act 2002 (LGA) requires a DC policy to be reviewed at least every three years.

Ferrymead Development

The existing Mitre 10 MEGA in Ferrymead is located at 1005 Ferry Road, Christchurch (refer Figure 1.1).

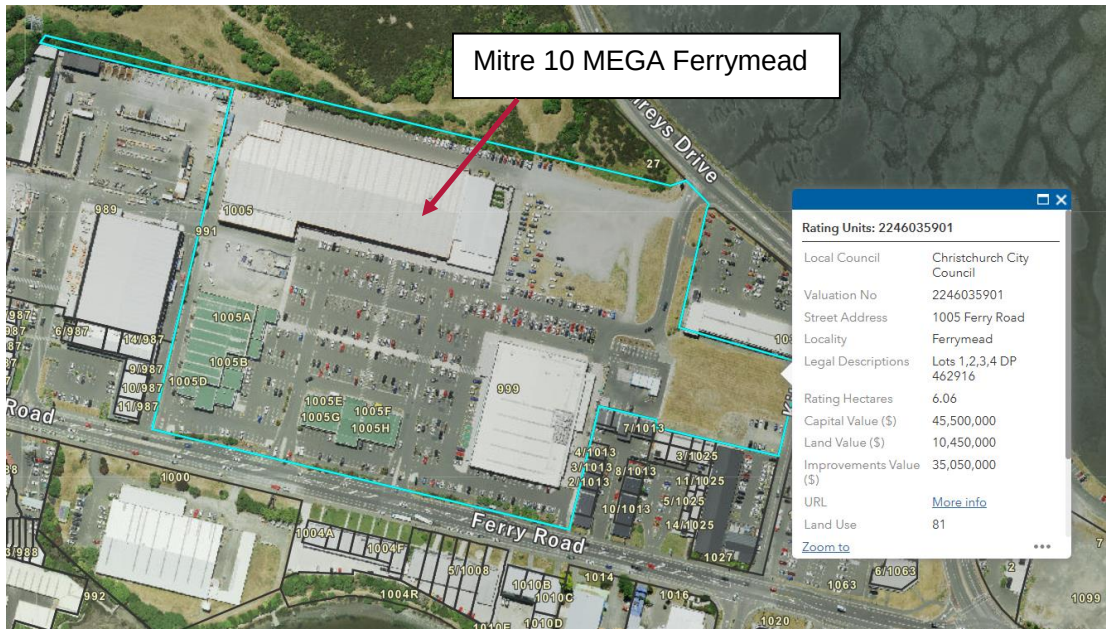


Figure 1.1 Site location. (Source: Canterbury Maps).

RMA/2023/421 is a Section 127 resource consent that authorised a 1,085m² extension of floor area to the existing Mitre 10 MEGA building. The addition would increase the total building area to 16,494m² (15,409m² + 1,085m² = 16,494m²).

2. The Draft Policy

2.1 Overview

The draft Policy quantifies the demand placed on relevant infrastructure types by development. Demand is measured as a proportion of the demand placed on infrastructure by an average residential unit, referred to as a Household Unit Equivalent (HUE)³. The HUE is the average demand a household places on Council infrastructure, refer to Figure 2.1 for the values set out in the draft Policy.

Table 2. Assumed residential demand on infrastructure per Household Unit Equivalent (HUE)

Activity	Base unit measure	Demand per HUE
Water supply	Litres per day	644.80
Wastewater collection /treatment and disposal	Litres per day	572.00
Stormwater and flood protection	Impervious surface area m ²	367.00
Transport	Vehicle trips per day	6.35

Figure 2.1 Excerpt from pp. 15 of the draft Policy.

DC charges are applied on a catchment basis⁴. Some activities use a district-wide catchment (i.e., the charge per HUE is consistent across the district) whereas others use defined catchments (i.e., the

³ The draft Policy, Section 3.2, pp. 15.

⁴ The draft Policy, Section 3.5, pp. 20.

charge per HUE varies by catchment). For example, the 'Community Infrastructure' activity is charged on a 'district wide' basis, whereas the 'Road Network' activity is charged on a 'catchment' basis (i.e., Banks Peninsula, Central, East, North, South and West)⁵.

2.2 Non-Residential Development

Non-residential developments are assessed as a proportion of the HUE. DCs for non-residential developments are calculated as a multiple of the HUE⁶.

- For transportation, water supply (WS), wastewater (WW) collection and WW treatment / disposal activities, the HUE is derived based on the average demand on infrastructure per square metre of floor area by business type.
- For stormwater (SW) and flood protection, the HUE is calculated according to the Impervious Surface Area (ISA) of the development.
- For Community Infrastructure, the HUE is 1 per non-residential development.

HUE multipliers are set out in Part 8 of the draft Policy.

2.3 Charges

The schedule of DC charges per HUE are shown in Figure 2.2

Table A.16: Development contribution charge for each activity by catchment. The overall charge will depend on the location of the development.

Group of Activities	Activity	Catchment	DC Charge (excl GST)	DC Charge (incl GST)
Network Infrastructure	Active Travel	Christchurch	\$ 1,588.65	\$ 1,826.95
	Community Infrastructure	District Wide	\$ 3,028.85	\$ 3,483.18
	Public Transport	Christchurch	\$ 897.12	\$ 1,031.68
	Road Network	Banks Peninsula	\$ 1,047.83	\$ 1,205.01
		Central	\$ 2,162.36	\$ 2,486.72
		East	\$ 1,905.74	\$ 2,191.60
		North	\$ 3,607.87	\$ 4,149.05
		South	\$ 4,204.02	\$ 4,834.62
		West	\$ 4,288.11	\$ 4,931.33
	Stormwater and Flood Protection	Banks Peninsula	\$ 695.86	\$ 800.24
		Urban	\$ 5,840.90	\$ 6,717.03
	Wastewater Collection	Akaroa Harbour	\$ 176.52	\$ 203.00
		Banks Peninsula	\$ -	\$ -
	Wastewater Treatment and Disposal	Urban	\$ 4,536.81	\$ 5,217.33
		Akaroa Harbour	\$ 17,604.26	\$ 20,244.90
		Banks Peninsula	\$ -	\$ -
		Urban	\$ 2,014.56	\$ 2,316.74
	Water Supply	Banks Peninsula	\$ 13,883.96	\$ 15,966.55
		Urban	\$ 3,760.13	\$ 4,324.15
Reserves	Garden and Heritage Parks	District Wide	\$ 275.92	\$ 317.31
	Neighbourhood Parks	Banks Peninsula	\$ 570.80	\$ 656.42
		Central	\$ 551.88	\$ 634.66

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Christchurch City Council Development Contributions Policy 2024/2025

	East	\$ 556.81	\$ 640.33
	North	\$ 5,718.56	\$ 6,576.35
	South	\$ 656.67	\$ 755.17
	West	\$ 5,067.73	\$ 5,827.89
Regional Parks	District Wide	\$ 121.50	\$ 139.73
Sports Parks	District Wide	\$ 928.02	\$ 1,067.22

Figure 2.2 Schedule of DC charges by HUE⁷

2.4 Draft Policy Activities

An overview of the 'activities' for which DCs are collected are described, relevant to the Mitre 10 MEGA Ferrymead extension.

⁵ The draft Policy, Appendix 1, pp. 50.

⁶ The draft Policy, Section 3.2.3, pp. 16.

⁷ The draft Policy, Appendix 1, pp. 50/51

Water Supply (WS)

The HUE demand for WS is 644.8 litres per day⁸. The draft Policy assumes that WS demand is driven by employee requirements by business type. Mitre 10 MEGA Ferrymead is assessed as 'Retail', therefore, the HUE multiplier is 0.0115 per m² of floor area.

Table 6. Assumed non-residential demand for water supply per square metre of developed building by business type(1)

Business type	Average gross floor area per person (m ² per FTE)	Average demand for water per worker (litres per FTE per day)	Average demand for water by gross floor area (litres per day per m ²)	HUE demand per m2
Accommodation	60	244	4.07	0.0063
Commercial	19.43	56	2.86	0.0044
Retail	7.5	56	7.41	0.0115
Industrial (dry)	101	56	0.55	0.0009
Warehouse	103	33	0.32	0.0005
Childcare (per child)	N/A	56	N/A	0.0862

Figure 2.3 WS business types and HUE multiplier⁹

Waste Water (WW) Collection, Treatment and Disposal

The HUE demand for WW collection, treatment and disposal is 572 litres per day¹⁰. The draft Policy assumes that WW demand is driven by employee requirements by business type, and that all water used is discharged into the WW network. Mitre 10 MEGA Ferrymead is assessed as 'Retail', therefore the HUE multiplier is 0.0117 per m² of floor area.

Table 8. Assumed non-residential demand for wastewater per square metre of developed building by business type(1)

Business type	Average gross floor area per person (m ² per FTE)	Average demand for water per worker (litres per FTE per day)	Average demand for water by gross floor area (litres per day per m ²)	HUE demand per m2
Accommodation	60	220	3.67	0.0064
Commercial	19.43	50	2.57	0.0045
Retail	7.5	50	6.67	0.0117
Industrial (dry)	101	50	0.50	0.0009
Industrial	40	130	3.25	0.0059
Warehouse	103	30	0.29	0.0005
Childcare (per child)	N/A	50	N/A	0.0874

(1) Christchurch City Council infrastructure design standard

Figure 2.4 WW business types and HUE multiplier¹¹

Storm Water (SW) and Flood Protection

The demand for SW management is based on the average impervious surface area of each site. In a residential scenario, this is the sum of the average residential building footprint (with square metres

⁸ The draft Policy, Table 2, pp. 15.

⁹ The draft Policy, Table 6, pp. 37.

¹⁰ The draft Policy, Table 2, pp. 15.

¹¹ The draft Policy, Table 8, pp. 38.

used as the unit), and the average additional impervious surfaces such as driveways and paths (also in square metres). The HUE demand for SW and flood protection is 367m²¹². Unlike other network infrastructure activities (WS, WW, and Transport) all non-residential development is subject to the same HUE multiplier, therefore the HUE multiplier is 0.0044 per m² of impervious surface area.

Share of 1m² of non-residential impervious surface related to flooding and erosion =
 1m² x flooding and erosion portion =
 1m² x 40% = **0.40 m²**

Share of 1m² of non-residential impervious surface related to surface water quality =
 1m² x contaminant load ratio x surface water quality portion =
 1m² x 60% x 2 = **1.20 m²**

Effective equivalent area =
 Flooding and erosion share + contaminant loading share =
 0.40m² + 1.20m² = **1.60 m²**

1m² of non-residential impervious surface = 1.60 ÷ 367 HUE/ m² = 0.0044 HUE

Figure 2.5 SW HUE multiplier for non-residential activities¹³

Transport

Transport DCs are separated into three activities:

- Active Travel
- Public Transport
- Road Network

For transport, each different land use is assessed by estimating the number of vehicles per day (vpd) that will be generated by an industry class building¹⁴. This approach recognises that some activities will generate a greater level of traffic than others (for example, a supermarket will generate a higher number of trips per 100m² of floor area compared to a warehouse or storage building). The activity-based non-residential HUE for transport is shown in Figure 2.6. Mitre 10 MEGA Ferrymead is assessed as 'Hardware'¹⁵, therefore the HUE multiplier is 0.0222 per m² of floor area.

¹² The draft Policy, Table 2, pp. 15.

¹³ The draft Policy, pp. 39.

¹⁴ The draft Policy, Section 8.5, pp. 40.

¹⁵ Defined in the draft Policy, pp 10, as: a site where the primary activity is the retail sale of a range of building materials, households and garden hardware, and other DIY goods

Table 9: Activity-based non-residential HUE factory

Land use	Trips vpd ¹	Measure	Classification ²			Net Trips vpd ³	HUE Equivalence
			1	2	3		
			50%	20%	5%		
Residential unit	6.35	Unit	100	0	0	6.4	1.00
Retirement units	1.9	Unit	100	0	0	1.9	0.30
Aged-care rooms	1.3	Room	100	0	0	1.3	0.20
Offices	15.0	100m2 GFA	70	20	10	5.9	0.0093
Retail centres & shops (ex Supermarkets)	85.0	100m2 GFA	30	50	20	22.1	0.0348
Supermarkets	110.0	100m2 GFA	20	50	30	23.7	0.0372
Service stations with retail	133.0	per pump	5	20	75	13.6	0.0215
Hardware	33.0	100m2 GFA	82	5	13	14.1	0.0222
Bulky goods (large format retail)	17.0	100m2 GFA	82	5	13	7.3	0.0114
Drive-in fast food restaurants	250.0	100m2 GFA	20	30	50	46.3	0.0728
Fitness centres	21.9	100m2 GFA	60	20	20	7.7	0.0121
Medical centres	40.7	100m2 GFA	60	20	20	14.2	0.0224
Mixed business & industrial warehousing	5.0	100m2 GFA	60	30	10	1.8	0.0029

Figure 2.6 Transport land uses and HUE multiplier¹⁶

Community Infrastructure and Reserves

Non-residential development for community infrastructure and reserves is 1 HUE per non-residential development¹⁷. This recognises that non-residential development receives some benefit from those assets, but that it is not possible to allocate a specific demand based on either the development type, or size of the development in a way that can be applied consistently and equitably.

Summary

The resulting HUE multipliers applicable to the Mitre 10 MEGA Ferrymead extension are shown in Table 2.1.

¹⁶ The draft Policy, Section 8.5, pp 42.

¹⁷ The draft Policy, Section 8.6, pp 43.

Table 2.1 HUE multipliers Mitre 10 MEGA Ferrymead extension

Activity	Mitre 10 MEGA Ferrymead business/activity type	HUE Multiplier
WS	Retail	0.0115 / m ²
WW	Retail	0.0117 / m ²
SW and flood protection	Non-residential	0.0044 / m ²
Transport	Hardware	0.0222 / m ²
Community Infrastructure and Reserves	Non-residential	Maximum of 1

2.5 Catchments

DCs are charged for each activity by catchment (defined geographic areas), and as such, the overall charge will be dependent on the location of the site. Table 2.2 shows the different activities for which DCs are collected, along with the associated Mitre 10 MEGA Ferrymead catchment area, and resulting DC charge per HUE. The catchment areas have been determined by reviewing the catchment maps in Appendix 3 of the draft Policy.

Table 2.2 DC Charge per HUE for Mitre 10 MEGA Ferrymead

Activity	Mitre 10 MEGA Ferrymead Catchment	DC Charge (excl GST)	DC Charge (incl GST)
Active Travel	Christchurch	\$1,588.65	\$1,826.95
Community Infrastructure	District Wide	\$3,028.85	\$3,483.18
Public Transport	Christchurch	\$897.12	\$1,031.68
Road Network	East	\$1,905.74	\$2,191.60
SW and Flood Protection	Urban	\$5,840.90	\$6,717.03
WW Collection	Urban	\$4,536.81	\$5,217.33
WW Treatment and Disposal	Urban	\$2,014.56	\$2,316.74
WS	Urban	\$3,760.13	\$4,324.15
Garden and Heritage Parks	District Wide	\$275.92	\$317.31
Neighbourhood Parks	East	\$556.81	\$640.33
Regional Parks	District Wide	\$121.50	\$139.73
Sports Parks	District Wide	\$928.02	\$1,067.22

3. Assessment

The draft Policy sets out the process for determining DC charges. This process has been followed to determine what the overall DC charge would be for the Mitre 10 MEGA expansion described in Section 1.1 of this technical note.

3.1 Step 1 – Development test

Policy question: Does the development meet the criteria for being a "development" for which DCs are assessed?

Assessment: Section 197(1) of the LGA defines a "development" as "any subdivision, building (as defined in section 8 of the Building Act 2004), land use, or work that generates a demand for reserves, network infrastructure, or community infrastructure"¹⁸.

The application relates to land use that, for network infrastructure purposes, generates demand for network infrastructure, so the answer is yes. Since DC charges for Community Infrastructure and Reserves is assessed "as 1 HUE per additional new lot at subdivision or when creating a new business unit regardless of scale or land use associated with the development"¹⁹, the extension therefore will not create any new demand on that Community Infrastructure and Reserves. If it were a new development, such as a standalone business, then a DC charge for Community Infrastructure and Reserves would apply.

3.2 Step 2 – Assess demand on infrastructure from the new development

Policy question: How much growth capacity for each activity will the development require?

Assessment: The consent authorises an increase of 1,085m² floor area. This is translated into HUE for the purpose of calculating the DC charge, refer to Table 3.1.

Table 3.1 HUE by activity for Mitre 10 MEGA Ferrymead expansion

Activity	Mitre 10 MEGA Ferrymead business/activity type	HUE Multiplier	Resulting HUE
WS	Retail	0.0115	12.4775
WW	Retail	0.0117	12.6945
SW & Flood Protection	Non-residential	0.0044	4.774 ²⁰
Transport	Hardware	0.0222	24.087
Community Infrastructure and reserves	Non-residential	Maximum of 1	0 ²¹

3.3 Step 3 – Determine any existing demand credits

Policy question: If replacing previous development(s), how much capacity was previously used? What is the net increase in capacity required to service the development?

Assessment: The development does not replace previous development.

¹⁸ The draft Policy, pp. 14 (verbatim).

¹⁹ The draft Policy, Section 3.2.3, pp.14 (verbatim).

²⁰ This assumes the only new impermeable surfaces includes the roof of the extension.

²¹ Refer to the discussion in 3.1 of this report.

3.4 Step 4 – Calculate the net increase in demand from the new development

Policy comment: The net increase in demand for each activity is calculated by subtracting Step 3 (credits) from Step 2 (demand).

Assessment: There are no credits.

3.5 Step 5 – Apply the relevant catchment charges

Policy comment: Apply the relevant catchment DC charge for each activity.

Assessment: The DC charge (Table 3.2) has been calculated by multiplying the assessed HUE of the increase in floor area (Table 3.1) by the DC charge for each activity (Table 2.2).

Table 3.2 DC Charge for Mitre 10 MEGA Ferrymead expansion

Activity	DC Charge (excl GST)	DC Charge (incl GST)
Active Travel	\$38,265.81	\$44,005.74
Community Infrastructure	\$0.00	\$0.00
Public Transport	\$21,608.93	\$24,850.08
Road Network	\$45,903.56	\$52,789.07
SW and Flood Protection	\$27,884.46*	\$32,067.10*
WW Collection	\$57,592.53	\$66,231.40
WW Treatment and Disposal	\$25,573.83	\$29,409.86
WS	\$46,917.02	\$53,954.58
Garden and Heritage Parks	\$0.00	\$0.00
Neighbourhood Parks	\$0.00	\$0.00
Regional Parks	\$0.00	\$0.00
Sports Parks	\$0.00	\$0.00
Totals	\$263,746.15	\$303,307.82
Totals (excluding SW and Flood Protection)*	\$235,861.69	\$271,240.72
Totals (Transportation only)	\$105,778.30	\$121,644.89

3.6 Step 6 – Calculate the total DC required

Policy comment: Aggregate the DC charges required for each activity.

Assessment: The total DC required for the Mitre 10 MEGA Ferrymead expansion is shown in the 'Totals' row of Table 3.2.

4. Case Study

There is approximately 5,000m² of vacant land directly east of the Mitre 10 MEGA Ferrymead building. For the purposes of this assessment, it has been assumed that this could be developed in the future and have assumed a general retail use (rather than a hardware store). The charge when assessed against the draft Policy has been determined and then compared with that of the 2021 Policy.

4.1 Draft Policy

The HUE multipliers would remain the same for as shown in Table 2.1 for all activities except for transportation, which would need to be adjusted to the 'retail centres & shops (excl supermarkets)' HUE multiplier. The applicable HUE demand for the 5,000m² retail example is shown in Table 4.1.

Table 4.1 HUE by activity for 5,000m² retail example

Activity	Mitre 10 MEGA Ferrymead business/activity type	HUE Multiplier	Resulting HUE
WS	Retail	0.0115	57.5
WW	Retail	0.0117	58.5
SW & Flood Protection	Non-residential	0.0044	22.0
Transport	Retail	0.0348	174
Community Infrastructure and reserves	Non-residential	Maximum of 1	1²²

The DC charges by activity per HUE remains the same as shown Table 2.2. The resulting DC charge for the 5,000m² standalone retail development adjacent to the Mitre 10 MEGA Ferrymead building is shown in Table 4.2.

Table 4.2 DC Charge for standalone retail development

Activity	DC Charge (excl GST)	DC Charge (incl GST)
Active Travel	\$276,425.10	\$317,889.30
Community Infrastructure	\$3,028.85	\$3,483.18
Public Transport	\$156,098.88	\$179,512.32
Road Network	\$331,598.76	\$381,338.40
SW and Flood Protection	\$128,499.80	\$147,774.66
WW Collection	\$265,403.39	\$305,213.81
WW Treatment and Disposal	\$117,851.76	\$135,529.29
WS	\$216,207.48	\$248,638.63
Garden and Heritage Parks	\$275.92	\$317.31
Neighbourhood Parks	\$556.81	\$640.33
Regional Parks	\$121.50	\$139.73
Sports Parks	\$928.02	\$1,067.22
Totals	\$1,496,996.26	\$1,721,544.17
Totals (Transportation only)	\$764,122.74	\$878,740.02

²²A 'Community Infrastructure and Reserves' charge would apply if a standalone (new) development

4.2 2021 Policy Activities

To assess the DC charge against the 2021 Policy, the same process has been followed as in Section 2.4 for the draft Policy (as the steps are the same as in the 2021 Policy). For completeness, the following subsections set out the approach and HUE multipliers for each activity type.

Water Supply (WS)

The HUE demand for WS is 620 litres per day²³. This is slightly lower than that of the draft Policy. It is assumed that WS demand is driven by employee requirements by business type. The development is assessed as 'Retail', therefore, the HUE multiplier is 0.0037 per m² of floor area.

Table A.4.2. Assumed non-residential demand for water supply per square metre of developed building by business type(1)

Business type	Average gross floor area per person (m ² per FTE)	Average demand for water per worker (litres per FTE per day)	Average demand for water by gross floor area (litres per day per m ²)	HUE demand per m ²
Accommodation per room	60	300	5.00	0.0081
Commercial	40	80	2.00	0.0032
Retail	35	80	2.29	0.0037
Industrial (dry/light)	40	80	2.00	0.0032
Industrial	40	130	3.25	0.0052
Warehouse	40	80	2.00	0.0032
Education	12.5	25	2.00	0.0032

(1) Christchurch City Council infrastructure design standard

Figure 4.1 WS business types and HUE multiplier²⁴

Waste Water (WW) Collection, Treatment and Disposal

The HUE demand for WW collection, treatment and disposal is 550 litres per day²⁵. This is slightly lower than that of the draft Policy. The 2021 Policy assumes that WW demand is driven by employee requirements by business type, and that all water used is discharged into the WW network. The development is assessed as 'Retail', therefore the HUE multiplier is 0.0042 per m² of floor area.

Table A.4.4. Assumed non-residential demand for wastewater per square metre of developed building by business type(1)

Business type	Average gross floor area per person (m ² per FTE)	Average demand for water per worker (litres per FTE per day)	Average demand for water by gross floor area (litres per day per m ²)	HUE demand per m ²
Accommodation per room	60	300	5.00	0.0091
Commercial	40	80	2.00	0.0036
Retail	35	80	2.29	0.0042
Industrial (dry/light)	40	80	2.00	0.0036
Industrial	40	130	3.25	0.0059
Warehouse	40	80	2.00	0.0036
Education	12.5	25	2.00	0.0036

(1) Christchurch City Council infrastructure design standard

²³ 2021 Policy, Table 2, pp 11.

²⁴ 2021 Policy, Table A.4.2, pp 136.

²⁵ 2021 Policy, Table 2, pp 11.

Figure 4.2 WW business types and HUE multiplier²⁶

Storm Water (SW) and Flood Protection

The demand for SW management is based on the average impervious surface area of each site. In a residential scenario, this is the sum of the average residential building footprint (with square metres used as the unit), and the average additional impervious surfaces such as driveways and paths (also in square metres). The HUE demand for SW and flood protection is 427m²²⁷, which is higher than the draft Policy. Unlike other network infrastructure activities (WS, WW, and Transport) all non-residential development is subject to the same HUE multiplier, therefore the HUE multiplier is 0.0038 per m² of impervious surface area.

Share of 1m² of non-residential impervious surface related to flooding and erosion =

1m² x flooding and erosion portion =

1m² x 40% = **0.40 m²**

Share of 1m² of non-residential impervious surface related to surface water quality =

1m² x contaminant load ratio x surface water quality portion =

1m² x 60% x 2 = **1.20 m²**

Effective equivalent area =

Flooding and erosion share + contaminant loading share =

0.40m² + 1.20m² = **1.60 m²**

1m² of non-residential impervious surface = 1.60 ÷ 427 HUE/ m² = **0.0038 HUE**

Figure 4.3 SW HUE multiplier for non-residential activities²⁸

Transport

Transport DCs are separated into three activities:

- Active Travel
- Public Transport
- Road Network

The transport HUE demand is 9.3 vehicle trips per day²⁹.

For non-residential development, the HUE demand for transport is determined based on the District Plan zone in which the activity will occur. This approach differs from the draft Policy, which is discussed further in Section **Error! Reference source not found.** The site is in the 'Local Centre Zone' in the Christchurch District Plan³⁰, which replaces the previous 'Commercial Core Zone' (CC). Hence, the zoned based non-residential HUE multiplier is 0.0428 per m² of floor area.

²⁶ 2021 Policy, Table A.4.4, pp 137.

²⁷ 2021 Policy, Table 2, pp 11.

²⁸ 2021 Policy, Appendix A.4.3, pp 138.

²⁹ 2021 Policy, Table 2, pp 11.

³⁰ <https://districtplan.ccc.govt.nz/?t=map&feature=DistrictPlanIndex&featureId=47>

Table A.4.10. Methodology for Calculating Business HUEs for Transportation

Zone Code	Base Trips/100sqm GFA	GFA for Zone	"Business Trips" - at "gate"	Equivalent HUE	Equivalent UEs/100sqm GFA	Equivalent HUEs/sqm GFA
CB	10.0	786,931	78,608	8,430	1.07	0.0107
CBP	14.5	51,193	7,436	797	1.56	0.0156
CC	39.9	666,202	265,889	28,514	4.28	0.0428
CCMU	11.3	476,465	53,867	5,777	1.21	0.0121
CL	84.6	159,953	135,311	14,511	9.07	0.0907
CMU	7.7	417,376	32,128	3,445	0.83	0.0083
CO	24.8	160,045	39,703	4,258	2.66	0.0266
CRP	15.2	245,274	37,389	4,010	1.63	0.0163
CSF	26.8	158,646	42,472	4,555	2.87	0.0287
IG	2.9	2,297,712	67,757	7,266	0.32	0.0032
IH	2.4	2,263,583	54,679	5,864	0.26	0.0026
IP	3.9	73,836	2,855	306	0.41	0.0041
SPA	15.6	342,996	53,476	5,735	1.67	0.0167
SPO	9.3	530,980	49,143	5,270	0.99	0.0099
Total/Average	10.7	8,631,192	920,713	98,737	1.14	0.0114
1	2	3	4	5	6	7

Figure 4.4 District Plan zones and associated transport HUE multiplier³¹

Community Infrastructure and Reserves

Non-residential development for community infrastructure and reserves is 1 HUE per non-residential development³². This recognises that non-residential development receives some benefit from those assets, but that it is not possible to allocate a specific demand based on either the development type, or size of the development in a way that can be applied consistently and equitably. This is the same approach as taken in the draft Policy.

Summary

The resulting HUE multipliers applicable to the 5,000m² retail example are shown in Table 4.3.

Table 4.3 HUE multipliers 5,000m² retail example

Activity	5,000m ² retail development business/activity type/zone	HUE Multiplier
WS	Retail	0.0037 / m ²
WW	Retail	0.0042 / m ²
SW and flood protection	Non-residential	0.0038 / m ²
Transport	CC	0.0428 / m ²
Community Infrastructure and Reserves	Non-residential	Maximum of 1

4.3 Catchments

As with the draft Policy, the 2021 Policy levies DCs for each activity by catchment, so the overall charge depends on the location of the site. Table 4.4 shows the different activities for which DCs are collected, along with the associated 1005 Ferry Road catchment area, and resulting DC charge per HUE. The

³¹ 2021 Policy, Table A.4.10, pp 143.

³² 2021 Policy, Section A.4.5, pp. 144.

catchment areas have been determined by reviewing the catchment maps in Appendix 2 of the 2021 Policy.

Table 4.4 DC Charge per HUE for 5,000m² retail example

Activity	1005 Ferry Road catchment	DC Charge (excl GST)	DC Charge (incl GST)
Active Travel	Active Travel Catchment (Metro)	\$851.70	\$979.46
Community Infrastructure	District Wide	\$859.50	\$988.43
Public Transport	Public Transport Catchment (Metro)	\$481.42	\$553.63
Road Network	Suburban	\$948.58	\$1,090.87
SW and Flood Protection	Heathcote	\$4,095.55	\$4,709.89
WW Collection	East	\$258.31	\$297.06
WW Treatment and Disposal	Christchurch	\$935.35	\$1,075.65
WS	Woolston Sumner	\$980.85	\$1,127.97
Garden and Heritage Parks	District Wide	\$140.36	\$161.42
Neighbourhood Parks	Suburban	\$535.35	\$615.65
Regional Parks	District Wide	\$101.07	\$116.23
Sports Parks	District Wide	\$337.17	\$387.75

5. Assessment

Steps 1-5 in the 2021 Policy have been followed to determine the overall DC charge for the 5,000m² retail development, the resulting charges are shown in Table 5.1. Table 5.1 DC Charge for 5,000m² retail development (2021 Policy)

Activity	DC Charge (excl GST)	DC Charge (incl GST)
Active Travel	\$182,263.80	\$209,604.44
Community Infrastructure	\$859.50	\$988.43
Public Transport	\$103,023.88	\$118,476.82
Road Network	\$202,996.12	\$233,446.18
SW and Flood Protection	\$77,815.45	\$89,487.91
WW Collection	\$5,424.51	\$6,238.26
WW Treatment and Disposal	\$19,642.35	\$22,588.65
WS	\$18,145.73	\$20,867.45
Garden and Heritage Parks	\$140.36	\$161.42
Neighbourhood Parks	\$535.35	\$615.65
Regional Parks	\$101.07	\$116.23
Sports Parks	\$337.17	\$387.75
Totals	\$611,285.29	\$702,979.19
Totals (Transportation only)	\$488,283.80	\$561,527.44

6. Discussion & Conclusion

The method to calculate transportation DCs in the draft Policy differs from that of the 2021 Policy. Simplistically, the 2021 Policy generalises transportation demand across a District Plan zone and is therefore based on an average for that zone. It does not account for the fact that different land uses within a zone will generate varying levels of traffic, and therefore in practice, varying levels of demand on transport infrastructure. That approach is referred to as a zone-based approach. Conversely, the draft Policy is based on land use type, irrespective of zone. This is referred to as an activity-based approach.

The activity-based method is not new to Christchurch. It was used in previous DC policies (from 2006-2013), before changing to a zone-based approach in the 2015 Policy. A comparison in vpd rates, trip proportion, and HUE multipliers between the policies that have used an activity-based approach is shown in 1. The 'classification' column recognises that many trips include several stops. A portion of the total trips associated with the non-residential land use is therefore assumed to fall under each of the following three classifications:

1. **Primary:** That portion where the sole purpose of the trip is to visit a single business. It is assumed that 50% of those trips are associated with that business land use.
2. **Secondary:** That portion where the purpose of the trip is to visit a number of businesses. It is assumed that 20% of those trips are associated with that business land use.
3. **Incidental:** That portion where the visit to the business is incidental to other purposes. For example, it is likely that a visit to a service station is incidental to the primary purpose of a trip. It is assumed that 3% of those trips are associated with that business land use.

Table 6.1 Activity-based comparison

Policy Year	Land use	VPD (per 100m ² GFA)	Classification			Equivalent per 100m ²	Per 1m ²
			1 (50%)	2 (20%)	3 (3%)		
2006 ³³	Bulk goods/home improvement stores	40	60%	30%	10%	27.2	0.022
2007 ³⁴	Bulky goods	40	60%	30%	10%	14.5	0.0097
2009 ³⁵	Bulky goods	40	60%	30%	10%	14.5	0.0098
2013 ³⁶	Bulk goods / Home improvement stores ³⁷	40	60%	30%	10%	14.5	0.0098
2013 (2014 amendment) ³⁸	Bulk goods / Home improvement stores	40	60%	30%	10%	14.5	0.0098
Draft Policy ³⁹	Hardware	33	82%	5%	13%	14.1	0.0222
	Bulky goods (large format retail)	17	82%	5%	13%	7.3	0.0114

The comparison shows that bulky goods and home improvement stores have been assigned virtually the same trip rates throughout the policies. A key difference in approach in the Draft Policy is that a new category 'Hardware' has been introduced which has a different trip rate to that of the 'Bulky goods (large format retail)'. The trip rate for 'bulky goods' in the draft Policy is also less than half than that of previous policies.

Of note is that the transport related DC charge for the Mitre 10 MEGA Ferrymead extension is virtually the same if assessed against the draft Policy (\$121,644.89) or the 2021 Policy (\$121,856.70). This is a coincidence of the calculation as opposed to suggesting the transport DCs have not increased generally. The similarity in DC charges between the Policies for this development is explained by the new method resulting in a lower transport HUE but applying a higher charge per HUE. It is also noteworthy that the overall DC charge when assessed against the draft Policy (excluding Stormwater and Flood Protection i.e. \$271,240.72), is more than double the charge when assessed against the 2021 Policy (that also excludes Stormwater and Flood Protection i.e. \$132,635.13).

The 5,000m² retail case study and comparison in DC charges between the 2021 Policy and the draft Policy provides a useful basis of understanding of the cost impact of the draft Policy on development. Simplistically, it shows the DC charge for the same development will be nearly 2.5 times the cost if assessed against the draft Policy compared to the 2021 Policy. This finding is generally consistent with the graph shown in Figure 6.1 (purple bars reflecting the 2021 charge and the orange bars reflecting the draft Policy charges). The draft Policy charge for the Central and East catchments (which are the most relevant areas for this assessment) are significantly higher than the 2021 charge.

³³ 2006 Policy, pp 60.

³⁴ 2007 Policy, pp 58

³⁵ 2009 Policy, pp 205

³⁶ 2013 Policy, pp 101

³⁷ Note that the vpd

³⁸ 2014 amendment, pp 62.

³⁹ Draft Policy, pp 42.

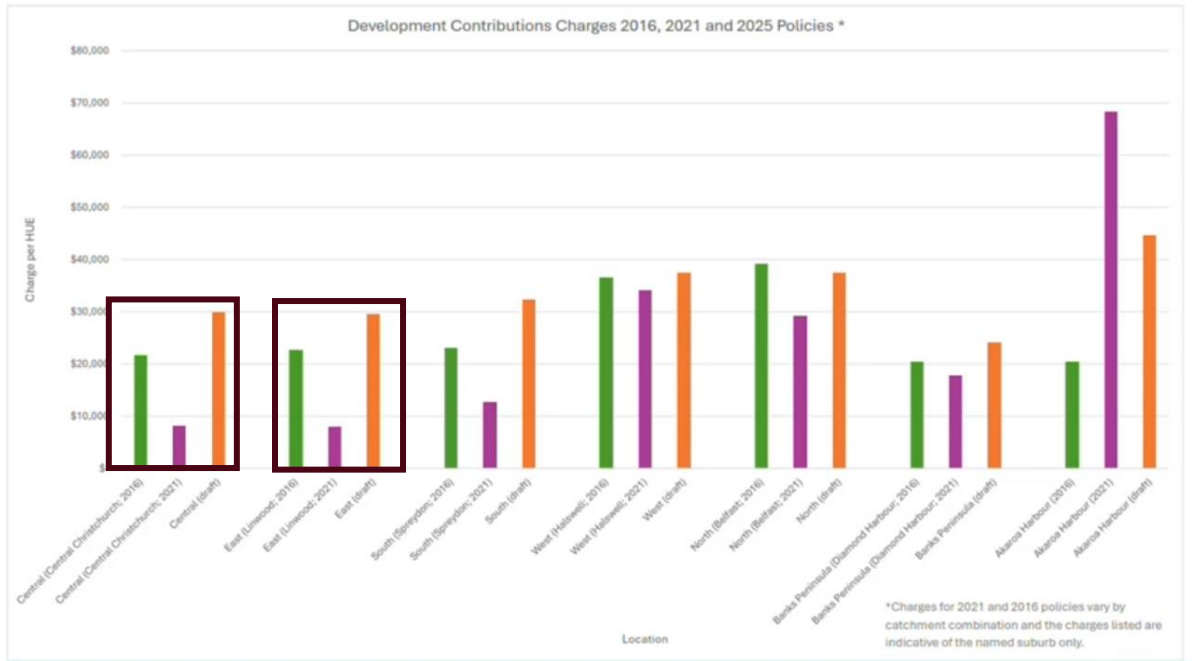


Figure 6.1 DC charge comparison between 2016, 2021 and 2025 Policies.⁴⁰

⁴⁰ Snippet from draft DC webinar 9 March 2025 <https://letstalk.ccc.govt.nz/DevelopmentContributions>

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SUBMISSION ON CHRISTCHURCH CITY COUNCIL DRAFT DEVELOPMENT CONTRIBUTIONS POLICY 2025

1. This feedback on the Christchurch City Council Draft Development Contributions Policy 2025 (**Draft Policy**) is provided by **P D Sloan**.

Overview

2. Mr Sloan is Christchurch based commercial property developer, who, over the past five decades, has undertaken numerous commercial developments throughout Christchurch, including at Ferrymead (1005 Ferry Road).
3. Mr Sloan purchased the Ferrymead land (1005 Ferry Road) from the Christchurch City Council, in 1996, at which time it was a service and storage yard. Since then, Mr Sloan has significantly improved the land, establishing it as the focal point of the Ferrymead commercial area, comprising the Woolworths supermarket and Mitre 10 Mega as anchor stores, along with a gym and several smaller convenience stores.
4. Since acquiring the land, Mr Sloan has obtained resource consent to develop it for commercial activities, had the land rezoned to recognise these activities, installed stormwater, flood protection, transport and roading infrastructure (including footpaths, traffic islands, deceleration lanes, etc), provided necessary access and easements to enable the development of adjacent land (which otherwise could not be developed), and paid to the Council almost \$5M in rates to fund essential city services and infrastructure, including roads, water and wastewater systems, parks, libraries, and recreation facilities.
5. As a longstanding commercial property developer, Mr Sloan has observed and experienced ever increasing development costs, including increased construction costs, but also increased Council consenting and other Council related costs, particularly more recently.
6. These increased costs have been disproportionate to any economic gain of development.
7. While many of these increased costs are borne by developers (impacting margin) it is simply untenable for developers to bear all costs if development is to remain viable, and some costs must, by necessity, be passed on to tenants - through increased rents for example.
8. Against this backdrop, Mr Sloan is deeply concerned that the Draft Policy proposes to increase development contributions by up to 271%. These increases will push these existing cost related issues beyond the tipping point and will disincentivise and/or stifle future development in Christchurch, which will become uneconomic and unviable.

Proposed Increases are Counterintuitive

9. The Council promotes the development contribution increases under the Draft Policy on the basis that growth has slowed, with fewer developments being undertaken and there being thus fewer developments from which to recoup growth related infrastructure costs.
10. This is a counterintuitive proposition.
11. Firstly, if there is less growth, then the requirements for growth related infrastructure will surely decrease proportionately.

12. Secondly, an almost three-fold increase in development contributions will very likely have the effect of slowing development even further, by driving up the costs of development even higher and disincentivising and/or making unviable this much needed investment in the City.

Property Council Submission

13. Mr Sloan has read (in draft) the feedback provided by the Property Council New Zealand on the Draft Policy. Mr Sloan SUPPORTS the position expressed by the Property Council in its feedback and ADOPTS the points made in their entirety.
14. Mr Sloan is particularly concerned with the proposed increase in development contributions payable, the proportionality to development, and the equitability of the regime more generally.
15. Mr Sloan is additionally concerned by the lack of transparency with which the policy is formulated and administered, and the actual application of the funds collected to growth related infrastructure projects.

Ferrymead Case Study

16. To understand the impacts of the Draft Policy, Mr Sloan engaged Abley to ascertain the development contributions that would be payable for existing and future commercial development of his Ferrymead landholding (1005 Ferry Road). The Abley Report is **attached** and forms part of this feedback.
17. Mr Sloan has recently undertaken a circa 1000m² extension to the Mitre 10 Mega Garden centre. The 1000m² extension was to enable the better display of existing stock and to improve the shopping experience for existing customers, within only a 5% increase in customers expected due to the extension. The development contributions calculated as payable under the current, 2021 policy total \$132,635.13 (incl GST), exclusive of any charge for stormwater infrastructure, which Mr Sloan has himself provided onsite. The quantum of this existing charge seems disproportionate and/or excessive given the nature, scale and purpose of the garden centre extension, which will give rise to only very limited additional demand on Council infrastructure.
18. The Abley Report (Section 3) demonstrates that under the Draft Policy, the development contributions payable for this same extension would total \$271,240.72 (incl GST and excluding any stormwater charges), this being more than **double** the charge under the 2021 Policy. While the existing charge is disproportionate to the additional demand on infrastructure arising from the garden centre extension, the charge under the Draft Policy is even more so.
19. Not all the Ferry Road land is yet developed and there is the possibility of developing a further 5000m² for commercial activities. The Abley report (Section 4) assesses the development contribution payable on this future development as \$702,979.19 (incl GST) under the 2021 policy, and \$1,721,544.17 (incl GST) under the draft policy, being nearly **2.5 times** the charge under the 2021 Policy.
20. The charge under the Draft Policy would equate to roughly 15% of the cost of the development, which is unduly excessive, with no clear rationale or justification being provided in any of the Draft Policy documentation for this degree of increase.
21. As stated earlier, if this development were to be pursued, in order for it to remain economic, the significantly increased costs would need to be passed onto future tenants. This assumes

a tenant who would be willing to pay that rental rate could be found. This is an 'unknown' which gives to a high degree of risk that may very likely count against proceeding with the additional 5000m² development.

22. In sum, had Mr Sloan known that development contributions would be payable at the levels under the 2021 Policy, let alone the Draft Policy, he would not have undertaken the Ferry Road development at all. This would be to the significant detriment of the Ferrymead and wider community, in so far as the existing development provides necessary community services and facilities. It would also see a very significant decrease in the rates payable on the property, which could further detrimentally impact the community in so far as it would result in reduced funding for essential city services and infrastructure.

Draft Policy should be REJECTED

23. Mr Sloan OPPOSES the Draft Policy for all the reasons stated above, for the reasons given in the Property Council submission, and for the further reasons to be given at the hearing.
24. Mr Sloan seeks that the Draft Policy is REJECTED.
25. Mr Sloan further supports and adopts the submission of the Property Council in so far as to seeks that the Council pause its review of the Development Contributions Policy, pending the imminent Central Government direction on this issue. It is wholly inefficient to embark on this Policy review, at the ratepayers' and submitters' expense, when it is highly likely that the new regime will require further wholesale changes.
26. Mr Sloan DOES WISH to be heard in support of his submission on the Draft Policy.

SIGNATURE OF SUBMITTER:



Rebecca Wolt
On behalf of P D Sloan
Date: 26 March 2025

ADDRESS FOR SERVICE:



Contact Person: Rebecca Wolt

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 26/03/2025

First Name: (required) Celia

Last Name: (required) Quinnell

Name of Organisation/business:

Ensure you have the authority to submit

Church Property Trustees

Your role: (required) Property Manager

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Fee for development contributions assessments

1.2.17

What don't you like about our recommended policy position on the Fee for development contributions assessments

Church Property Trustees for the Anglican Parish of Riccarton Spreydon have not been in a position to develop a site at 65 Riccarton Road due to constraints around the removal of the CCC heritage listing.

Now that this has taken place, it is likely a developer developing this land will incur a huge increase and we are seeking to retain the current status for this site.

We ask for a longer period of time to do this.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Somewhat

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 26/03/2025

First Name: (required) Julie

Last Name: (required) Comfort

Name of Organisation/business:

Ensure you have the authority to submit

Fletcher Residential Ltd

Your role: (required) Consultant Planner

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

Yes

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustmentRemoval of multi-unit adjustment for stormwater

Small residential unit adjustment

You can read more about this on our [Let's Talk](#) page.

1.2.2

What do you like about our recommended policy position on the small residential unit adjustment?

-

1.2.3

What don't you like about our recommended policy position on the small residential unit adjustment?

Please see the attached document

Removal of multi-unit adjustment for stormwater

You can read more about this on our [Let's Talk](#) page.

1.2.14

What do you like about our recommended policy position on the Removal of multi-unit adjustment for stormwater?

-

1.2.15

What don't you like about our recommended policy position on the Removal of multi-unit adjustment for stormwater?

Please see the attached document

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Don't know / not sure

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

Please see the attached document

Attached Documents

Name	
FRL Submission to CCC re DC Policy 2025	

Submission to Christchurch City Council

Draft Development Contributions Policy – 2025

Submission by: Fletcher Residential Ltd

Address: c/- Davie, Lovell-Smith Ltd, PO Box 679, Christchurch 8140

Submission Topic 1 - Small Unit HUE Discount

1. Fletcher Residential Ltd (FRL) opposes the proposed change to the Small Unit discount, from applying to any unit that is less than 100m² in GFA (including garage) to only applying to 1 bedroom units, without a size limitation.
2. FRL's experience is that there is little different in the infrastructure demand between 1 bedroom units and 2 bedroom units/townhouses. Their 2-bed units are not designed with families in mind, and they are unaware of any of their units being occupied by families. Many of their 2-bed units are occupied by 2 people, while many of their 1-bed units are occupied by couples. In this regard, there would appear to be little difference in the demand placed on Council's infrastructure between a 1-bed unit and 2-bed unit.
3. FRL acknowledges the reduction in the size of 3-bed+ homes, particularly where no garaging is provided within the building, and that such these units do represent a full HUE with regard to their demand on Council infrastructure. A solution to this would be to reduce the overall unit size to which the small unit reduction would apply to a limit of 90m² GFA. This would more accurately reflect the size of 1 to 2-bed units being provided within the City.

Request of Council: That Council amend the Small Unit HUE discount to enable it to be applied to 2-bed units, OR to reintroduce the maximum unit size to which it applies to a maximum 90m² GFA.

Submission Topic 2 - Multi-Unit Adjustment for Stormwater

1. The discussion material provided around the removal of the multi-unit adjustment justifies this on the basis that the updated Impervious Surface Area (ISA) calculation takes into account the smaller units sizes now being provided within the City, and that on that there is no rationale for having an adjustment based solely on two units being joined.
2. FRL disagrees with this and considered that calculating the HUEs for multi-unit residential developments on the actual ISA is appropriate as it better reflects the actual demand placed on Council's services for those units and ensures that multi-level complexes are not over-charged. In higher denser areas, such as in the Central City, and those now provided for around the major suburban centres, the impervious surface area per residential units within a complex is likely to be substantially less than the new average of 367m². This is particularly so for multi-level apartment buildings.

3. The only way in the draft Policy for this type of adjustment to be undertaken is through the Special Assessment process set out in clause 3.2.4. This would require a developer to request an assessment of Council for every development undertaken. It is considered that this would place an additional administrative burden on both Council and developers as they would have to go through this extra step, for every high density development within the City.
4. It is considered that reinstating the adjustment would not result in any additional administrative burden. Currently, the Impervious Surface Area is provided as part of the building consent or resource consent application. This ensure that the exact information is provided to Council and the calculation to provide the HUEs for any given complex is relatively simple.

Request of Council: **That Council reinstate the Multi-Unit adjustment for stormwater, so that the Stormwater HUE calculation for multi-units is undertaken based on the actual Impervious Surface Coverage of a development, rather than the total number of units to be provided.**

Fletcher Residential Limited would like to appear before Council in relation to this submission

[Redacted Signature]

On behalf of Fletcher Residential Ltd

Contact:

Julie Comfort, Davie Lovell-Smith Ltd,

[Redacted Contact Information]

26 March 2025

Date

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 26/03/2025

First Name: (required) Cody

Last Name: (required) Cooper

Name of Organisation/business:

Ensure you have the authority to submit Greater Ōtautahi

Your role: (required) Committee Member

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustment Catchments for Neighbourhood Parks and Road Network activities

Small residential unit adjustment

You can read more about this on our [Let's Talk](#) page.

1.2.2

What do you like about our recommended policy position on the small residential unit adjustment?

We support the small residential unit adjustment with a view towards increasing affordable, spatially-efficient housing within the central city. Encouraging more one-bedroom homes will help grow the central city population, support local businesses, and strengthen the availability of rentals without contributing to urban sprawl. Higher residential density in the city core better utilises existing already paid for infrastructure and public transport, reducing the need to build out new and expensive infrastructure where it will not be as well used.

1.2.3

What don't you like about our recommended policy position on the small residential unit adjustment?

While individual one-bedroom units generate lower infrastructure demand, a high concentration of them could still require significant investment in transport, water, and other community services.

City fringe areas often lack robust public transport, meaning residents may be forced to rely exclusively on cars, increasing congestion and emissions. Further, if the area's demographics shift, an oversupply of one-bedroom homes may not meet future needs, leading to inefficient land use.

Accordingly, we only support this adjustment within the central city. Applying it to fringe areas could encourage car-dependent development and strain suburban infrastructure, undermining efforts to create a well-connected, compact city.

Catchments for Neighbourhood Parks Road Network activities

You can read more about this on our [Let's Talk page](#).

1.2.8

What do you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

It is essential that funding remains ring-fenced to these catchments so that contributions collected in a particular area are reinvested there, rather than being redistributed elsewhere. This approach ensures that new developments pay for the infrastructure they rely on, reducing the burden on existing ratepayers.

1.2.9

What don't you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

Catchments should be carefully defined to ensure fairness, with a strong focus on making sure people are contributing to—and benefiting from—the services they use as much as possible.

Many areas across Christchurch still lack essential infrastructure like footpaths, despite development contributions (DCs) being collected. We urge Council to prioritise completing basic infrastructure—especially footpaths and safe transport links—in areas where development contributions have already been collected. Residents should see tangible benefits from these contributions, rather than funds being tied up for years or spent elsewhere.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Somewhat

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

We believe that, in aggregate, the total increase in development contributions (DCs) should be higher than the proposed ~3%, rather than further increasing general rates. Development should pay its fair share for the infrastructure it necessitates, ensuring that existing ratepayers are not unfairly burdened.

PT Futures: It is regrettable that the majority of this project is no longer being funded by central government. Given the importance of PT to Christchurch's future, it makes sense for DCs to contribute to its development.

Mass Rapid Transit (MRT): The proposed \$53~ is not enough to deliver meaningful progress. MRT is no longer a luxury but a must-have for the city's future transport network. New housing developments will increase network loads, and it is only fair that new residents contribute more than existing ratepayers. DCs should be increased significantly to ensure funding for multiple business cases over a short timeframe. If Council is unable or unwilling to drive MRT forward effectively, it must identify another body capable of delivering real progress and ensure the project is completed.

Parks in the North & West: We support increasing DCs for parks in these areas as post-quake land availability has diminished, and new land will need to be purchased to provide adequate green spaces as the population grows. It is fair that those who benefit contribute to these costs. Neighbourhood parks can also provide stormwater solutions (i.e. wetlands).

Major Cycle Routes (MCRs): We support collecting committed funds in advance to avoid a large debt or rates shock when major investments are required. A gradual funding approach through DCs will make future cycleway projects more financially sustainable. However, we strongly oppose Lyttelton paying an active travel rate when it has no MCRs, while Templeton is excluded despite clearly benefiting from the South Express MCR in the future.

Roads: It is unclear why Central's roads would be more expensive than those in the East, where roads are in significantly worse condition. More transparency is needed to justify this funding allocation.

Renewals: The \$50 million allocation for Street Asset Renewals to Support Capital Projects lacks clarity regarding its intended use. Given that this represents a significant portion of the cost increase for the active travel development contribution (DC), there needs to be full transparency on how these funds will be spent. While we strongly support investment in active travel, we cannot support unexplained cost increases without a clear breakdown of what projects or upgrades this programme includes. If this funding is meant to subsidise general street renewals rather than specifically improving active transport infrastructure, it is misleading to place this burden in the active travel category.

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 26/03/2025

First Name: (required) David

Last Name: (required) Palmer

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustment
 Remission provision
 Catchments for Neighbourhood Parks and Road Network activities
 Fee for development contributions assessments
 Land in lieu of cash development contributions

Small residential unit adjustment

[You can read more about this on our Let's Talk page.](#)

1.2.2

What do you like about our recommended policy position on the small residential unit adjustment?

The proposed change makes a lot of sense to me. Our city has a serious lack of one-bedroom homes, particularly apartments. Therefore this adjustment makes sense in the central city, as it may incentivise development of more of those types of properties.

1.2.3

What don't you like about our recommended policy position on the small residential unit adjustment?

However I think this adjustment does not make sense in outer parts of the city, as this will potentially not be enough to recoup the significant costs of required infrastructure growth in the outer suburbs. Sprawl suburbs require exponentially greater infrastructure costs the further they are from the city core, and typically require highly expensive and inefficient car-based transport infrastructure, so we should not be encouraging small swellings in these areas.

Remission provision

[You can read more about this on our Let's Talk page.](#)

1.2.6

What do you like about our recommended policy position on the remission provision?

There should be absolutely no remission policy. It is entirely unacceptable that developers can lawyer up and wriggle out of paying their fair share. I am thinking specifically of examples like the Northlink shopping centre, where a specific charge was put in place to upgrade the intersection of Greers/Langdons, but somehow the developers got themselves off the hook. As a result the entire cost of the intersection upgrade (only needed due to the large volume of traffic created by the Northlink facility) fell to ratepayers. This kind of thing should not be possible.

Catchments for Neighbourhood Parks Road Network activities

You can read more about this on our [Let's Talk](#) page.

1.2.8

What do you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

Localising these things is good.

DCs should be dramatically increased for transport purposes. DCs can be used to fund things such as the major cycle route programme. Areas such as Templeton will soon be benefiting from the South Express cycleway, but are not part of the AT catchment. meanwhile Lyttelton is in the AT catchment but has no cycleways. These discrepancies should be addressed.

Greenfield developments in Casebrook should have higher DCs, and that funding should be directed toward the Wheels to Wings cycleway, and local cycle connector improvements in the north-west. The north-west is extremely poorly served by cycle infrastructure at the moment.

DCs should also be generally increased to create funding for the PT Futures programme and associated MRT business case. The lack of funding from central government will need to be met locally, and it is desirable that DCs should pay for work on that growth infrastructure, rather an increase in the general rate.

1.2.9

What don't you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

DCs should be ringfenced to the area they are intended to improve. It is unacceptable that we have developments going in at places like Belfast and Halswell where there has been no effort to provision footpaths for those residents. Similarly, local connection cycle routes and street redesigns need to be considered a fundamental part of the urban design for areas undergoing substantial growth, particularly infill growth. As the city has sprawled, formerly rural roads have become residential roads, but have never been redesigned to make them amenable to their changed purpose. I am thinking specifically of Sturrocks Road in Redwood, which is still designed like a high-speed rural road, but is in fact a residential road. DCs can help to fund improvements to roads like this.

Fee for development contributions assessments

You can read more about this on our [Let's Talk](#) page.

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

Yes, council should recover all the costs they can from developers. That is the entire point of the developer contribution system. Charging a fee for assessment should be part of that.

Land in lieu of cash development contributions

You can read more about this on our Let's Talk page.

1.2.18

What do you like about our recommended policy position on the Land in lieu of cash development contributions?

This can be removed, cash is king.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Somewhat

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 26/03/2025

First Name: (required) Graham

Last Name: (required) Robinson

Name of Organisation/business:

Ensure you have the authority to submit

Addington Neighbourhood Association

Your role: (required) Treasurer

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Small residential unit adjustmentLarge residential unit adjustmentRemission provision

Catchments for Neighbourhood Parks and Road Network activitiesCatchments for Three Waters activities

Stormwater reductions for developer provided infrastructureRemoval of multi-unit adjustment for stormwater

Fee for development contributions assessmentsLand in lieu of cash development contributions

Household unit equivalent (HUE) multipliers update

Small residential unit adjustment

[You can read more about this on our Let's Talk page.](#)

1.2.2

What do you like about our recommended policy position on the small residential unit adjustment?

It makes smaller dwellings with fewer bedrooms more affordable

1.2.3

What don't you like about our recommended policy position on the small residential unit adjustment?

2 & 3 bedroom rental units these days often have a couple in each bedroom, to cover the cost of the rent -but you have to assume only one person per room, as often there might only be a couple in a 3-bed house , with a spare room kept for occasional visiting relatives.

Would a flat rate per bedroom be fairer ?

Large residential unit adjustment

[You can read more about this on our Let's Talk page.](#)

1.2.4

What do you like about our recommended policy position on the large residential unit adjustment?

A larger charge for 6+ bedrooms reflects the potential likelihood that more people will live there, but it might not be the case.

1.2.5

What don't you like about our recommended policy position on the large residential unit adjustment?

It penalizes people who have spare bedrooms which might or might not be in use. The value of a larger property is often accompanied by higher rates.

Remission provision

[You can read more about this on our Let's Talk page.](#)

1.2.6

What do you like about our recommended policy position on the remission provision?

Remove remission, with ability for Council to make special exemptions (with clearly defined qualifications for such treatment)

1.2.7

What don't you like about our recommended policy position on the remission provision?

Removal reduces Council ability to guide development parameters.

Catchments for Neighbourhood Parks Road Network activities

[You can read more about this on our Let's Talk page.](#)

1.2.8

What do you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

Local catchments should ensure funds go back into the area the funds come from, as they are facing the most increase to resources/infrastructure.

1.2.9

What don't you like about our recommended policy position on the Catchments for Neighbourhood Parks Road Network activities?

The catchment areas are perhaps too large to reflect development trends eg. higher density in inner-city areas and less

development in built areas further away from the CBD, but still in the same catchment area.

Catchments for Three Waters activities

You can read more about this on our [Let's Talk page](#).

1.2.10

What do you like about our recommended policy position on the Catchments for Three Waters activities?

Larger & fewer catchments with overcapacity to allow for increased demand or breakdowns of pumping stations.

1.2.11

What don't you like about our recommended policy position on the Catchments for Three Waters activities?

There may need to be sub-catchments within the catchments

Stormwater reductions for developer provided infrastructure

You can read more about this on our [Let's Talk page](#).

1.2.12

What do you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

reduction in fees for 50%+ reduction in demand seems fair.

1.2.13

What don't you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

If all stormwater at a development is kept out of the Council system, there should be no fees charged, provided it cannot "leak" into the Council system.

Removal of multi-unit adjustment for stormwater

You can read more about this on our [Let's Talk page](#).

1.2.14

What do you like about our recommended policy position on the Removal of multi-unit adjustment for stormwater?

Each unit should pay their share, but should not be paying as much as a property with one dwelling and mainly bare land.

Fee for development contributions assessments

You can read more about this on our [Let's Talk page](#).

1.2.16

What do you like about our recommended policy position on the Fee for development contributions assessments?

It seems fair to charge an assessment fee which is related to the development contributions, user-pay.

1.2.17

What don't you like about our recommended policy position on the Fee for development contributions assessments

Is this fee non-refundable if the development does not go ahead ?

Land in lieu of cash development contributions

You can read more about this on our [Let's Talk page](#).

1.2.18

What do you like about our recommended policy position on the Land in lieu of cash development contributions?

Less complicated and more transparent to have transactions kept separate.

Household unit equivalent (HUE) multipliers update

You can read more about this on our [Let's Talk page](#).

1.2.20

What do you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

In theory an HUE should reflect the demand for usage of resources.

1.2.21

What don't you like about our recommended policy position on the Household unit equivalent (HUE) multipliers update?

As mentioned earlier, this is not always the case.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Yes

2.2

Do you have any other feedback that should be considered by the Council when making a decision on the Development Contributions Policy Review?

we think it is important that a large proportion of development contributions be fed back into the area that paid them, as that is where the extra demand is centered.

Addington had an increase of about 560 dwellings between July 2018 and July 2023, but we have not seen a comparable increase of Council funds in the area. (\$30,000 x 560 = \$16.8 million)

Development Contributions need to be fair, not just another way to levy additional charges. If they are seen as being too high or unfair, it will stifle increased housing capacity. Once a building is built, the Council can levy rates for many years of its lifetime.

The existing demand credits should last no more than 10 years, possibly only five years, to encourage properties to be redeveloped sooner rather than later.

Development Contributions Policy Review 2025

Submitter Details

Submission Date: 27/03/2025

First Name: (required) Julie

Last Name: (required) Comfort

Name of Organisation/business:

Ensure you have the authority to submit Davie Lovell-Smith Ltd

Your role: (required) Consultant Planner

Feedback

1.1.1

Have you ever paid Development Contributions, or do you anticipate paying them in the next three years?

Required

No

1.2.1

Which policy changes would you like to provide feedback on?

We'll ask you what you like and don't like about each change you select. There is an opportunity to provide feedback on the draft Development Contributions Policy in general in the next section.

Stormwater reductions for developer provided infrastructure

Stormwater reductions for developer provided infrastructure

You can read more about this on our [Let's Talk](#) page.

1.2.12

What do you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

-

1.2.13

What don't you like about our recommended policy position on the Stormwater reductions for developer provided infrastructure?

We do not support the recommended policy position with regards to the reductions in contributions for developer provided stormwater infrastructure, particularly where that infrastructure is to be vested in Council.

The provision of stormwater basins that provide treatment and/or detention of stormwater by a developer is often a cheaper option for Council. If this infrastructure is not provided within a development, Council has to procure land themselves. This factor

alone can mean that the Council can save money through the provision stormwater basins by a developer. Stormwater basins take up a lot of land. The provision of these basins within a development is an opportunity cost for developers, as the land to be utilised cannot be used for residential or commercial purposes. Currently there is no other transaction between the developer and Council with regards to the land that is vested in Council for these basins. Unlike recreation reserves, where Council pay for the land involved, this does not occur for Local Purpose (Utility) Reserves that cover stormwater basins and waterways. As such, given that the land involved is often valued substantially higher than what the stormwater development contributions may be, the application of a discount in these circumstances is considered to be more equitable than the proposed policy position. This is case even if the basins are only providing for first flush treatment.

As such it is considered that the reductions that have previously occurred, should still be undertaken for those sites where the infrastructure is to be vested in Council, or alternatively Council could buy the land from the developer in the same manner as they do for Recreation Reserves.

2.1

Overall, do you support the Development Contributions Policy Review?

Required

Don't know / not sure

Property Council New Zealand

Submission on

Christchurch City Council Draft Development Contributions Policy 2025

26 March 2025

For more information and further queries, please contact
Sandamali Ambepitiya 

26 March 2025

Via email: letstalk@ccc.govt.nz

Submission on Christchurch City Council Draft Development Contributions Policy 2025.

1. Summary

- 1.1 Property Council New Zealand South Island Regional Branch ("Property Council") welcomes the opportunity to provide feedback on [Christchurch City Council Draft Development Contributions Policy 2025](#) ("the Draft DC Policy"). It is critical to have a robust development contribution policy that would allow the industry to make informed long-term investment decisions and ensure fair distribution of the cost of development amongst all ratepayers.
- 1.2 Property Council strongly opposes the proposed increases to development contribution fees. Development contributions can either enable or stifle development. The Draft DC Policy proposes increases up to 271 per cent which will negatively impact development resulting in; less development, less employment, less housing and less revenue for Christchurch City Council.
- 1.3 We are deeply concerned about the impact the proposed increases will have on housing supply and affordability. Significant development contribution fee increases will likely result in Christchurch becoming uncompetitive for new housing developments compared with neighbouring and other comparable regions. If enacted, this development contribution policy could add tens of thousands of dollars to the price of a new build house in Christchurch. The commercial implications of this policy will also be greatly impacted.
- 1.4 The Draft DC Policy was released prior to Central Government's announcement to overhaul development contribution fees and replace them with developer levies. Legislation enabling development levies will occur in September 2025, only six months away.
- 1.5 Property Council welcomed the Government's recent announcement regarding an overhaul of development contribution fees. Property Council has strongly advocated for an independent regulator to bring much-needed consistency to an unpredictable system. We have also advocated for development contributions be ringfenced to ensure that fees are spent directly on infrastructure tied to the specific development areas. Property Council has previously raised both ideas with the Government, so it's encouraging to see the Government working on legislative changes that will be introduced to the House in six months' time.
- 1.6 In light of the Government's new work programme to replace development contribution fees with development levies, **we recommend Christchurch City Council pause its development contributions review until the new levy system is in place.** This can be achieved through seeking approval to extend the three-year DC review timeframe within legislation, similar to what the Christchurch City Council has done in the past to receive extensions on Plan Changes.
- 1.7 A pause is the sensible thing to do, reducing council resources in the interim and creating certainty of status quo for developers before the overhaul of development contribution fees occurs. A comprehensive review of the Draft DC Policy should occur under the new development levy regime.

- 1.8 If Christchurch City Council does not pause the development contributions policy, it could halt developments until a developer levy programme is established, as the uncertainty of transitioning between two systems in under a year would likely discourage development.

2. Recommendations

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

- Pause the Draft DC Policy until the Government releases new requirements for councils under their development levies programme. This can be achieved through approving an extension to completing a DC Policy within a three-year period. A comprehensive review of the Draft DC Policy should occur under the new development levy regime.

- 2.2 However, if Christchurch City Council chooses to move forward with the Draft DC Policy, we recommend that Christchurch City Council:

- Does not increase development contributions by the amount proposed and instead reduces the rate of increase;
- Extend the list of existing demand credits to 15-20 years (**Option B**);
- Retain the current approach to large residential units over 100m² to be assessed at one HUE (**Option A**);
- Retain the remission provision (**Option A**);
- Explore and adopt elements from other councils' remission schemes, as these have proven to be effective in promoting development and boosting the vibrancy of areas;
- Continue providing discounts for on-site management/mitigation requirements, no matter the scale of mitigation (**Option C**); and
- Retain the multiunit adjustment for stormwater (**Option B**).

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.
- 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 the [Development Contributions Policy Review 2025](#). Comments and recommendations are provided on issues relevant to Property Council's members.

4. Pause the proposed DC Policy Amendments

- 4.1. We strongly encourage Christchurch City Council to pause the Draft DC Policy. The Draft DC Policy was released prior to Central Government's announcement to overhaul development contribution fees and replace them with developer levies. Legislation enabling development levies will occur in September 2025, only six months away. We recommend Christchurch City Council's resources are put into reviewing the new development levy system rather than making amends to the current development contributions policy which will be overhauled within the next year.
- 4.2. A pause can be made by requesting an extension to complete a DC Policy review. Councils often ask for extensions when central government makes new announcements. For example, Christchurch City Council requested an extension for their Plan Change after the government announced changes to Medium Density Residential Standards.
- 4.3. If Christchurch City Council does not pause the development contributions policy, it could halt developments until a developer levy programme is established, as the uncertainty of transitioning between two systems in under a year would discourage development.

5. Proposed Draft DC Policy Amendments

- 5.1. If Christchurch City Council continues to move forward with the Draft DC Policy, we have provided specific feedback below.

6. Impact of proposed fee increases

- 6.1. Development contributions can either enable or stifle growth. However, increasing fees by up to 271 per cent¹ is a strong deterrent for development in Christchurch and introduce a huge amount of uncertainty into the market.
- 6.2. Christchurch City Council has proposed significant increases to development contribution fees across Christchurch. If implemented, these increases may render some developments financially unfeasible for our members. Below are some examples of development fee increases across Christchurch for both residential and commercial projects that our members are facing:
- An average increase of \$15,000 per HUE/residential development.
 - A 122% increase in development contribution fees for a multi-use development project.
 - A 356% increase in development contribution fees for a large-scale townhouse project.

These proposed increases have raised serious concerns among our members about the viability of development, particularly given the rising construction costs and a softening market environment. Moreover, commercial development in Christchurch is already challenging, as the

¹ [Development Contribution charges 2016, 2021, 2025 comparison](#)

city grapples with lower lease rates while facing costs comparable to those in larger cities like Auckland and Wellington.

Table 1: Proposed charges for one household unit equivalent throughout the district

Catchment	Current DC	Average Proposed DC	Percent Increase
Christchurch Central (Central Catchment)	\$8,126.76	\$29,562.70	263.77%
Papanui (Central Catchment)	\$11,373.77	\$29,562.70	159.92%
Linwood (East Catchment)	\$7,874.03	\$29,273.25	271.77%
Burwood (East Catchment)	\$19,791.61	\$29,273.25	47.91%
Spreydon (South Catchment)	\$12,702.04	\$32,031.11	152.17%
Hornby (West Catchment)	\$26,640.42	\$37,200.54	39.64%
Belfast (North Catchment)	\$29,153.47	\$37,166.72	27.49%

Impact on housing affordability

- 6.3. The proposed development contribution fee increases could significantly increase the cost and risk of development. At a time when we desperately need to be increasing Christchurch's housing supply, particularly of affordable housing, and streamlining development, we are potentially creating a 'perfect storm' that could have the opposite effect.
- 6.4. Increased development contribution fees across Christchurch will likely result in the following outcomes:
- Additional costs being passed onto the eventual buyer or occupier, making housing and occupancy costs more expensive; and/or
 - Planned developments being postponed, re-evaluated, or cancelled, due to increased costs reducing the overall affordability of the development or project; and
 - Less affordable typologies of housing being built.

Impact on business and employment

- 6.5. Furthermore, Property Council's Property Impact report², shows that the property sector provides employment for 34,860 Canterbury residents. A significant portion of these workers will be employed and/or live in Christchurch. Having a development contribution policy that makes development unfeasible will have direct implications for employment, with numerous flow-on effects to the multitude of professional services and sub-contractors (such as plumbers or electricians) that work on new developments.
- 6.6. A typical land development subdivision project might employ around 130 people over the life of the project. A typical 100-unit apartment development project might employ around 300

²[Property Impact Report 2024](#), Property Council New Zealand.

people over the life of the project. If development goes elsewhere, the flow on effects for Christchurch are enormous.

- 6.7. Unaffordable development contribution fees will result in less activity, less employment and less spend in Christchurch.

7. Accuracy of development contribution calculations by Christchurch City Council

- 7.1. The sector is concerned with Christchurch City Council's calculation of development contributions. In some circumstances, we have received feedback that Christchurch City Council collected development contributions much higher than signalled, only to reduce these fees by a significant amount once the calculations are contested.
- 7.2. While the proposed increase in development contributions is concerning, it is the entire process for calculating and challenging these fees that is equally alarming. Perceptions of a lack of transparency and accountability is reducing trust in the system.
- 7.3. We are aware that Christchurch City Council is also pushing for a cost recovery on the cost of staff time to calculate development contribution fees. Concerns arise when inconsistencies occur in the calculations and the 'double checking' of fees could result in more charges for Christchurch City Council. Accuracy and transparency are critical to ensure double dipping in charges does not occur.

8. Alternative Funding and Financing

- 8.1. Property Council strongly supports the use of alternative funding and financing tools by local government, such as targeted rates, public-private-partnerships, or Special Purpose Vehicles ("SPVs") as enabled under the Infrastructure Funding and Financing Act. We recommend that Christchurch City Council implement alternative funding and financing tools for infrastructure to reduce cost pressures on new developments.
- 8.2. For example, SPVs are an important tool for funding and financing infrastructure in a fair and equitable manner. SPVs are advantageous as they sit off a Council's balance sheet and do not impact debt levels. Property Council has previously supported Tauranga City Council's use of SPVs for the Transport System Plan and Civic Precinct project, as well Wellington City Council's use of SPVs for the Moa Point sludge minimisation project.
- 8.3. All these additional tools are transparent, beneficiary pays funding models for local government, that are more equitable to ratepayers and better meet the legislative principles of transparency and objectivity for funding local government set out in both the Local Government Act 2002 and Local Governing (Rating) Act 2002.

9. Proposed DC Policy Amendment: Existing demand credits

- 9.1. Christchurch City Council is looking to revise its policy on existing demand credits. Property Council supports **Option B – extending the life of existing demand credits to 15-20 years.**
- 9.2. The expiry of development contributions credits was an issue for the commercial property sector in Christchurch in the last few years.

- 9.3. We note that development is a long-term game and is often subject to unforeseen challenges such as extended resource consent approval timelines (which is common for large commercial developments) and global events like the COVID-19 pandemic. Extending existing demand credits to 15-20 years will provide longer-term certainty for these more complex and timely developments.

10. Proposed DC Policy Amendment: Small Residential unit adjustment and large residential unit adjustment

- 10.1. For small residential units, the current DC policy provides an adjustment for residential developments with gross floor area less than 100m². Christchurch City Council is proposing to set adjustment for one-bedroom residential units only. One-bedroom homes would be assessed at 0.6 HUE. For large residential units, the current DC policy does not make any adjustments for large residential units. Christchurch City Council is proposing to apply a development contributions adjustment for larger houses.
- 10.2. We question what Christchurch City Council's intention is with the proposal to reduce one-bedroom residential units to 0.6 HUE. If the intention of the draft policy is to incentivise one-bedroom residential units, then we would support the proposal to provide what is effectively a remission for a development contribution fee.
- 10.3. However, we note that Property Council has had longstanding concerns over the use of bedrooms as a proxy for infrastructure demand. There is no strong link between the number of bedrooms and occupancy. As such, **we support Option A - retaining the current approach to large residential units over 100m² to be assessed at one HUE.**

11. Proposed DC Policy Amendment: Remission provision

- 11.1. Christchurch City Council is looking to revise its policy on remissions, and in particular, amend the policy to state that no remissions will be provided for in the policy. Property Council does not support this option.
- 11.2. **Property Council supports Option A – retaining the current approach.** Property Council encourages remissions because it helps increase intensification, create more affordable housing, and ultimately leads to better, more sustainable development outcomes for communities. We strongly recommend that Christchurch City Council keeps an open mind on retaining a remission given that they have proved to be effective in encouraging development across the country.
- 11.3. In 2021, as part of Hamilton City Council's wider efforts to transform the CBD a DC remission scheme was introduced. The scheme gave 100% remission on development contributions for buildings six storeys and over and 50% for those under six storeys. As a result of the remissions scheme, Hamilton's CBD is thriving.
- 11.4. We are concerned that the combination of higher development contributions and the inability to apply for a remission will create the 'perfect storm', ultimately driving housing development away from the central city and other key catchment areas. We encourage Christchurch City Council to learn from other council's remission schemes as they can be an effective tool to encourage development and enhance vibrancy of an area.

12. Proposed DC Policy Amendment: Stormwater reductions for developer provided infrastructure

- 12.1. The Christchurch District Plan requires most developments to include on-site stormwater management capacity as a condition of resource consent. Christchurch City Council's approach since around 2006 has been to discount development contributions for stormwater where a development provides mitigation that reduces demand on Christchurch City Council's stormwater network, no matter the scale of the mitigation.
- 12.2. Christchurch City Council is proposing to only provide reductions for significant on-site mitigation. It provides for a developer to request a special assessment to be done where the demand on Christchurch City Council's infrastructure is less than 50% of the average assumed demand.
- 12.3. **Property Council supports Option C – retain status quo.** This will see the continued provision of discounts for on-site management/mitigation requirements, no matter the scale of the mitigation. Furthermore, such a significant change should be placed on pause until clarity around the new developer levy scheme is put in place.

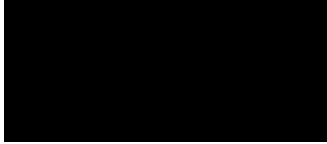
13. Proposed DC Policy Amendment: Removal of multiunit adjustment for stormwater

- 13.1. Christchurch City Council is looking to remove the multi-unit adjustment for stormwater.
- 13.2. Property Council supports **Option B – retain multiunit adjustment for stormwater.** Retaining the status quo creates a stronger incentive for intensification, particularly through medium-density housing such as townhouses and apartments. These dwelling types make more efficient use of land, offer a smaller scale of living spaces, and can be delivered to the market at more affordable price points compared to larger standalone homes. This approach also aligns more closely with the objectives of the National Policy Statement on Urban Development (NPS-UD).

14. Conclusion

- 14.1. Property Council recommends Christchurch City Council pause its DC policy review. This can be achieved by requesting an extension to the three-year timeframe established in legislation. A pause is the sensible thing to do, reducing council resources in the interim and creating certainty of status quo for developers before the overhaul of development contribution fees occur. A comprehensive review of the Draft DC policy should occur under the new development levy regime.
- 14.2. Property Council members invest, own, and develop property in the Canterbury region. We wish to thank Christchurch City Council for the opportunity to submit on the draft Development Contributions Policy 2025 as this gives our members a chance to have their say in the future of our region. We also wish to be heard in support of our submission.
- 14.3. Any further enquires do not hesitate to contact Sandamali Ambepitiya, Senior Advocacy Advisor, via email: [REDACTED]

Yours Sincerely,



Katherine Wilson
Head of Advocacy
Property Council New Zealand



26 March 2025

Christchurch City Council
53 Hereford Street
Christchurch

By email: Letstalk@ccc.govt.nz

Dear Sir / Madam

Re: Submission on Christchurch City Council Draft Development Contributions Policy 2025.

1. Summary

1.1. The Gough Family Office (“GFO”) is a Christchurch based Family Office with commercial, philanthropic and family interests. The GFO is a passionate supporter of investment into Christchurch along with philanthropic endeavours that will help Christchurch to thrive. The Family Office has direct property interests via Gough Property Limited (“GPL”) and indirect property interests via its shareholding in construction companies, including Mike Greer Homes NZ Limited (“MGH”).

1.2. Gough Property Limited is a property investment company. GPL owns, develops and manages commercial and industrial property in the South Island.

1.3. Mike Greer Homes NZ Limited is New Zealand’s largest privately owned building company, in the business of building new residential homes across New Zealand. In addition, MGH has a national development and commercial construction team.

1.4. The Gough Family Office is well placed to understand the impact the proposed draft development contributions policy will have on the residential and commercial property sector in Christchurch.

1.5. The Gough Family Office **strongly opposes** the proposed increase to development contribution fees.

1.5.1. The Draft DC Policy proposes increases of up to 271 per cent which will negatively impact development resulting in less development, less employment, less housing and less revenue for Christchurch City Council.

1.5.2. We are concerned about the impact the proposed increases will have on housing supply and affordability. Significant development contribution fee

increases will likely result in Christchurch becoming uncompetitive for new housing developments compared with the Selwyn and Waimakariri Districts. If enacted, this development contribution policy could add tens of thousands of dollars to the price of a new build house in Christchurch. This will have a significant impact on houses in the “affordable” category.

1.5.3. The Draft DC Policy was released prior to Central Government’s announcement to overhaul development contribution fees and replace them with developer levies. Legislation enabling development levies will occur in September 2025, only six months away. In light of the potential change that is coming from Central Government, we feel that it is an inefficient use of Council time, resource and funds to be undertaking the proposed review of the DC policy, when change mandated by Central Government is only a few months away. We recommend the Christchurch City Council pause its development contributions review, until the new levy system is in place.

1.5.4. A pause seems sensible, as it reduces the need to expend council resources and creates certainty of the status quo for developers before the overhaul of development fees occur. There is significant risk that projects will grind to a halt during the period of transition which could have a negative impact on the market, particularly with “affordable housing”.

2. Recommendations

2.1. We recommend the Christchurch City Council pause the draft Development Contributions policy until Government releases new requirements for Councils under their development levies programme.

2.2. However, should the Christchurch City Council choose to move forward with the Draft DC Policy review we recommend the following:

2.2.1. Does not increase development contributions by the amount proposed and instead reduces the rate of increase.

2.2.2. Extends the existing demand credits to 20 years (**Option B**).

2.2.3. Retain the current approach to Small Residential Units with a gross floor area less than 100sqm. (**Option A**)

2.2.4. Retain the current approach to large residential units over 100m² to be assessed at one HUE (**Option A**).

2.2.5. Retain the current approach with the remission provision (**Option A**).

2.2.6. Continue providing discounts for on-site management/mitigation requirements, no matter the scale of mitigation (**Option C**).

2.2.7. Retain the multiunit adjustment for stormwater (**Option B**).

2.2.8. Retain the status quo for the fee for development contributions assessments (**Option B**).

3. Impact of Proposed Changes

We expand further on specific recommendations and the subsequent impact as follows:

3.1. Pause the proposed draft Development Contributions Amendment

- As previously mentioned we encourage the Council to pause the proposed draft development contributions amendment.
- With the Central Government announcement to overhaul development contribution fees and replace with development levies, it would seem sensible to wait until the outcome of the development levies is complete. Implementing two potential changes inside of a 12 month period will cause excessive disruption and uncertainty and is likely to further discourage development.

3.2. Proposed Fee Increases

- The proposed fee increases represents an increase of up to 271% [Reference [DC Charges Comparison](#)] in development fees. This will create cost uncertainty in the market.
- There is potential to make projects uneconomic, particularly when the current sales environment is challenging.
- The increase is occurring when builders are less likely to be able to absorb such additional costs with finance and insurance costs at their highest. These cost increases are combined with changes to the building act which add cost, utility fees and other infrastructure upgrades and red tape and uncertainty. All told, projects will potentially stall and Council revenue will diminish.
- The increase is not aligned with the provision of affordable housing as the additional cost will need to be passed onto the purchaser. This will have a subsequent flow on impact with tenants needing to pay a higher weekly rental.
- We have analysed one Christchurch Central development comprising 86 townhouses (of which 51 are below the median house price and considered in the “affordable category”) that was consented in 2021. Under the proposed fee increase the Development Contributions payable would increase to 4.56 times, the fees that were assessed in 2021. In the current environment, that project would no longer be feasible and would not proceed. This would have a significant impact on providing affordable homes in the central city.

3.3. Extends Existing Demand Credits

- We support extending existing DC credits to 20 years (option B).
- Extending the development credits to 20 years will provide more certainty for complex projects that may have been placed on hold following the global pandemic and the subsequent down-turn in the economy.

3.4. Retain the current approach to small residential units

- We support **(option A)** to retain the current approach where houses under 100sqm are assessed based on 0.8 HUE.
- The size of residential units has reduced in recent years, to make them more affordable for first home buyers and investors.

3.5. Retain the Status Quo for development fee contribution assessments

- We support **(option B)** to not pay for assessment fees. It is unreasonable to expect an applicant to cover the cost of completing an assessment. We are opposed to a situation where the applicant is required to pay the cost of the Councils time for assessments which may be incorrect.

4. Conclusion

We recommend that the Council pauses its DC policy review.

The proposed changes to the development contribution policy will increase the cost of development and the houses in-particular affordable housing. Should the Council proceed with the review we propose the recommendations as detailed in this submission.

We wish to be heard in support of our submission.

Should you have any further enquiries, please contact Glenn Taylor [REDACTED] or [REDACTED]

Yours faithfully
Gough Family Office

[REDACTED]

Glenn Taylor
General Manager - Property



Registered Master Builders Association of New Zealand Incorporated

Submission on Christchurch City Council's Draft Contributions Policy 2025

March 2025

The Registered Master Builders Association submission on Christchurch City Council's Draft Contributions Policy 2025

The Registered Master Builders Association (Master Builders) welcomes the opportunity to submit to on *Christchurch City Council's Draft Contributions Policy 2025*.

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 billion¹. It also employed 294,100 people (or 10 per cent of the country's total workforce) in the year ended September 2024².

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 Survey – September 2024

1. Introduction

- 1.1 Master Builders appreciates the opportunity to provide feedback on Christchurch City Council's Draft Development Contributions Policy 2025. As a leading representative of the building and construction sector, we recognise the importance of development contributions (DCs) in funding essential infrastructure to support Christchurch's growth long term.
- 1.2 However, we hold concerns about the potential impacts of the proposed policy, particularly in terms of housing affordability, development feasibility, and the sustainability of the construction sector.

2. Concerns About the Proposed Increases

- 2.1 Master Builders are concerned about the proposed fee increases some of which are up to 271% which will negatively impact building activity, employment and revenue for Christchurch City Council.
- 2.2 This development contribution policy could add tens of thousands of dollars to the price of a new build house in Christchurch, making the city uncompetitive and driving development to other regions that will ultimately act as a deterrent to growth.

Table 1: Current and Proposed DC's per household

Area	Current DC	Proposed DC	Percent Increase
Christchurch Central (Central Catchment)	\$8,126.76	\$29,562.70	263.77%
Papanui (Central Catchment)	\$11,373.77	\$29,562.70	159.92%
Linwood (East Catchment)	\$7,874.03	\$29,273.25	271.77%
Burwood (East Catchment)	\$19,791.61	\$29,273.25	47.91%
Spreydon (South Catchment)	\$12,702.04	\$32,031.11	152.17%
Hornby (West Catchment)	\$26,640.42	\$37,200.54	39.64%
Belfast (North Catchment)	\$29,153.47	\$37,166.72	27.49%

3. Pause the Proposed DC Policy Amendments

- 3.1 Master Builders encourages Christchurch City Council to delay the draft DC policy. The draft DC policy was released just prior to the Central Government's announcement to reform development contributions fees and replace them with developer levies. The legislation enabling developer levies will be introduced in September 2025, that is only four months from after the planned final DC policy will be introduced.

- 3.2 This pause can be requested by seeking permission from the Minister for Local Government and the Minister for Housing and Infrastructure to delaying the process to complete DC policy review. There is little sense in introducing a policy that needs to be replaced soon after as the arrangements for council in the new developer levies system are changed.
- 3.3 We recommend that Christchurch City Council reviews the new development levy system rather than investing in amending the current development contributions policy which will be overhauled within the next year.

4. Alternative Funding and Financing

- 4.1 Master Builders advocates for greater collaboration between Christchurch City Council and the private sector. Meaningful engagement with developers and other stakeholders can foster a more balanced and equitable approach to funding Christchurch's growth.
- 4.2 We recommend exploring alternative funding mechanisms such as targeted rates, Special Purpose Vehicles (SPVs), contributions from Crown Infrastructure Partners, and support from the National Infrastructure Agency. These measures would help distribute the funding burden equitably among developers, future property owners, and existing ratepayers.
- 4.3 By adopting and implementing such measures, Christchurch City Council could equitably distribute the burden of infrastructure funding among developers, future property owners, and existing ratepayers. In addition, Christchurch City Council would better meet the legislative principles of transparency and objectivity for funding local government set out in both the Local Government Act 2002 and Local Governing (Rating) Act 2002.

5. Proposed DC Policy Amendment: Existing demand credits

- 5.1 Christchurch City Council is looking to revise its policy on existing demand credits. Master Builders supports Option B – extending the life of existing demand credits to 15-20 years.
- 5.2 Master Builder's notes that the expiry of development contributions credits has previously been an issue particularly for commercial builds that can be timely and complex.
- 5.3 Extending existing demand credits to 15-20 years provides enough time to combat unforeseen challenges that may arise such as global pandemics that have long term impacts.

6. Proposed DC Policy Amendment: Small Residential unit adjustment and large residential unit adjustment

- 6.1 Under the current Development Contributions (DC) policy, an adjustment is provided for small residential units with a gross floor area of less than 100m². Christchurch City Council is now proposing to apply this adjustment specifically to one-bedroom residential units, which would be assessed at 0.6 Household Unit Equivalent (HUE). For larger residential units, no adjustment is currently applied under the existing policy. The Council is proposing to introduce a development contributions adjustment for these larger homes.
- 6.2 Master Builders supports Option C – no adjustment and charge all residential units one HUE. In relation to large residential unit adjustments, Master Builders supports Option A – retain current approach: no large residential unit adjustment with all residential units over 100m² assessed at one HUE.

- 6.3 Master Builders understands that the Property Council has concerns over the use of bedrooms as a proxy for infrastructure demand and has conducted research finding that there is no strong link between the number of bedrooms and occupancy.

7. Proposed DC Policy Amendment: Remission provision

- 7.1 Christchurch City Council is looking to revise its policy on remissions, and in particular, amend the policy to state that no remissions will be provided for in the policy. Master Builders does not support this option (Option B).
- 7.2 Master Builders supports having remissions in the council's toolbox as it can help increase intensification but also encourage development from non-for-profit organisations and charities that provide positive outcomes for communities but often have difficulties with development contribution fees.
- 7.3 The inability to apply for remission provisions in other council regions has proven to be a barrier for some non-for-profit charities.
- 7.4 A remission scheme can be modelled to incentivise large scale commercial or apartment buildings in the CBD to attract activity and employment in the area.
- 7.5 Master Builders are concerned that the combined impact of increased development contributions and the removal of the ability to apply for remissions could deter housing development in the central city and other key catchment areas. It may also discourage projects led by charities and not-for-profit organisations, which are essential to the social fabric of the community. We encourage Christchurch City Council to consider the approaches adopted by other councils, such as Hamilton City Council, where remission schemes have proven effective in promoting development and enhancing the vibrancy of targeted areas.

8. Proposed DC Policy Amendment: Stormwater reductions for developer provided infrastructure

- 8.1 The Christchurch District Plan requires most developments to include on-site stormwater management capacity as a condition of resource consent. Christchurch City Council's approach since around 2006 has been to discount development contributions for stormwater where a development provides mitigation that reduces demand on Christchurch City Council's stormwater network, no matter the scale of the mitigation.
- 8.2 Christchurch City Council is proposing to only provide reductions for significant on-site mitigation. It provides for a developer to request a special assessment to be done where the demand on Christchurch City Council's infrastructure is less than 50% of the average assumed demand.
- 8.3 Master Builders supports Option C – retain status quo. This approach would continue to allow discounts for on-site management or mitigation measures, regardless of the scale of those efforts. Additionally, such a substantial change should be put on hold until there is greater clarity around the new developer levy scheme.

9. Proposed DC Policy Amendment: Removal of multiunit adjustment for stormwater

- 9.1 Christchurch City Council is proposing to remove the stormwater development contributions adjustment currently applied to multi-unit developments.
- 9.2 Master Builders supports Option B - retaining the multi-unit adjustment for stormwater. Maintaining the current approach provides a stronger incentive for urban intensification, particularly through medium-density housing such as townhouses and apartments. These housing types make more efficient use of land, offer more compact living options, and can be delivered at more affordable price points compared to larger standalone homes. This approach also better aligns with the goals of the National Policy Statement on Urban Development (NPS-UD).

10. Conclusion

- 10.1 In conclusion, while Master Builders recognises the importance of DCs in supporting Christchurch's growth, we believe the current draft policy imposes unsustainable costs on residential and commercial developers, homebuyers, and the wider construction industry.
- 10.2 We urge Christchurch City Council to adopt a more balanced and collaborative approach to ensure that infrastructure funding does not hinder the delivery of affordable and sustainable housing.
- 10.3 We remain committed to working with Christchurch City Council and other stakeholders to achieve these goals.
- 10.4 We thank you for the opportunity to make this submission.

Chris Sinclair
Canterbury Branch President

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26 March 2025

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SUBMISSION ON THE CHRISTCHURCH CITY COUNCIL DEVELOPMENT CONTRIBUTIONS POLICY REVIEW 2025

Kāinga Ora – Homes and Communities (“Kāinga Ora”) welcomes the opportunity to provide feedback on the Christchurch City Council Development Contributions Policy Review 2025.

This submission is focused on matters relating to development contributions for the land holdings Kāinga Ora own, as well as its development interests across Christchurch City. Kāinga Ora does not meet the definition of the Crown under the policy and is therefore liable to pay development contributions. Kāinga Ora has contributed significant development contributions in recent years through the delivery of new homes in Christchurch. Like other residents in Christchurch, these contributions support critical infrastructure and services for residents in Kāinga Ora homes. Accordingly, Kāinga Ora has a strong interest in the development contributions policy and its impact on housing delivery.

Submission on Christchurch City Council Development Contributions Policy Review

Following a review of the draft policy, Kāinga Ora has the following feedback:

1. Household Unit Equivalent Assessment of Residential Units

Kāinga Ora seeks the retention of the current residential unit assessment methodology, or the adoption of an alternative approach that reflects dwelling size or bedroom count. Kāinga Ora primarily delivers smaller dwellings, often one- or two-bedroom units to meet the demand of those on the public housing waitlist.

The removal of previous discounts for dwellings under 100m² will significantly increase the contributions for smaller two- and three-bedroom units. We support a more fairly apportioned regime that considers either:

- A retention of the status quo,
- A tiered model based on bedroom count or dwelling size, or
- A hybrid approach blending size and typology.

2. Expiry of Existing Demand Credits

Kāinga Ora requests an extension of the 10-year expiry period for development contributions credits. With anticipated reductions in the number of new social housing units delivered, credits associated with formerly developed Kāinga Ora-owned sites may expire before development proceeds. An extended timeframe will help support the long-term viability of these developments.

3. Areas of Demand Mapping and Higher Development Contributions Charges

In setting development contributions the Council is currently required to consider the distribution of benefits between the community as a whole, any identifiable part of the community, and individuals. Kāinga Ora seeks greater granularity in the delineation of ‘Areas of Demand’ in the policy maps. This is particularly important for three waters infrastructure, where large catchments, which have been proposed in response to Plan Change 14. This may disincentivise development in areas that are already well-served by infrastructure.

Kāinga Ora recommends refining catchment boundaries to accurately reflect infrastructure readiness, ensuring that development contributions align more closely to the actual impact and cost to the Council. We acknowledge changes may be appropriate in the future if changes in the funding regime are introduced.

4. Stormwater Infrastructure Discounts

Kāinga Ora supports the application of discounts where developments demonstrably place lower demands on the Council stormwater infrastructure, particularly in multi-unit developments with stormwater mitigations already being required.

We recommend:

- The retention of discounts for attached multi-unit dwellings.
- As opposed to the proposed 50%, there be a higher standard percentage reduction or a special assessment framework for qualifying developments.

- Council consider other alternative methods of calculating units of demand for stormwater.

5. Fees for Development Contributions Assessments

Kāinga Ora opposes the introduction of a fee to request a development contributions assessment. Access to accurate information is essential for determining project feasibility. Imposing a fee may create a barrier to development and reduce transparency, particularly where clarification is sought on a Household Unit Equivalent calculation or the applicability of a special assessment.

6. Use of Demand Credits Across Activity Types

Kāinga Ora requests an amendment to the policy that currently limits the use of existing demand credits across different activity types. In cases where land is transitioning from non-residential to residential use, existing infrastructure capacity should be considered in determining development contributions.

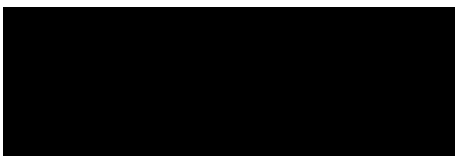
Kāinga Ora seeks flexibility for credits to be applied where infrastructure demand is not significantly increasing because of a change in land use.

Kāinga Ora seeks the following decision from Christchurch City Council

Kāinga Ora requests that Christchurch City Council adopt the amendments, additions, retentions, and suggestions outlined in this submission, and consider such further or consequential changes as may be required to give full effect to the matters raised above.

Next Steps

Kāinga Ora wishes to be heard in support of this submission and welcomes the opportunity to engage further with Council officers to collaboratively address the issues raised. Where appropriate, Kāinga Ora is open to presenting a joint case at a hearing with submitters raising similar matters.



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