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Thursday, 06 May 2004

**Christchurch City Council
PO Box 237
Christchurch
New Zealand**

Transmittal: **EMAIL**
CCC_PLAN@CCC.GOV.T.NZ

Dear Sir or Madam

**LONG TERM COUNCIL COMMUNITY PLAN
EXCESS WATER SUPPLY TARGETED RATE
BELGRAVIA INVESTMENTS LIMITED**

We object to the policy regarding the application of Excess Water Supply Targeted Rate (Christchurch City Council, Long Term Council Community Plan, Volume 3, page 111) and the application of this policy to:

"...land under single ownership on a single certificate of title and used for 3 or more household residential units [CHRISTCHURCH CITY WATER RELATED SERVICES BYLAW 2001, page 2]"

We want the Council to consider amending or deleting this policy when applied to Extraordinary Supply when the definition of Extraordinary Supply includes multiple household units.

We want the Council to action either of these proposals:

- a) Do not differentiate between Extraordinary Supply and Ordinary Supply when applied to all residential household units. We consider the Excess Water Supply Targeted Rate should be applied to every property where water is used in excess of the calculated daily allowance, or
- b) Do not charge the Excess Water Supply Targeted Rate to multiple household units on a single certificate of title. We consider that if a property has multiple units its residents are unfairly disadvantaged rather than if they were a single unit and could draw an unlimited supply.

We feel that the Excess Water Supply Targeted Rate:

- 1. Is not fair and equitable to all residents of Christchurch as a single household unit can use an unlimited amount of water without being affected by this policy.
- 2. Is not fair and equitable to all residents of Christchurch as two household units on a single certificate of title can use an unlimited amount of water without being affected by this policy.
- 3. Does not reflect the number of water users as the water allowance for a property is calculated on the capital value of the property rather than the

number of users. The higher capital value of a property does not justify a higher water allowance.

4. Does not reflect the number of household units as the water allowance for a property is calculated on the capital value of the property rather than the number of users. The number of household units is a fairer reflection of use rather than capital value.

We feel our proposal (a) is fair and equitable to all the residents of Christchurch as it is a user pays system but allows all users a right to a maximum rate of use. For this proposal to be truly equitable, multiple units on one certificate of title should have an allowance reflective of the number of household units. We feel this proposal fairly targets users who use excess water and hence are deserving of the Excess Supply Targeted Rate.

We feel our proposal (b) is fair and equitable to all the residents of Christchurch, as the Water Supply Targeted Rate would be increased to recover the water supply cost. This cost would then be evenly distributed over all residents rather than those living in multiple household units on one certificate of title that is currently proposed.

I wish to talk to the main points in this submission at the hearings to be held between Tuesday 1 June and Friday 11 June 2004.

Should you have any questions please do not hesitate to contact me.

Regards

Accommodate Group Ltd



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Director

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