# Summary submission form

# Instructions

## Please read before completing your submission

It will help us process your submission if you clearly state the issue you want the Council to consider, what specific action you think the Council should take, and why that should be done.

If you wish, you can present your submission at a hearing. (If that is the case, please tick the box). The hearings will be held between Thursday 25 May and Wednesday 7 June 2006. Generally, 10 minutes are allocated for hearing each submission, including time for questions.

It will help us if your submission also refers to the page of either the full version or the summary version.

Please note: we are legally required to make all written or electronic submissions available to Councillors and to the public. This includes the name and address of the submitter. All submissions will be published on the Council's website from 10 May 2006.

No anonymous submissions will be accepted.

You may send us your submission...

#### By mail

Please mail your submission (no stamp is required) to:

Freepost 178 Our Community Plan Christchurch City Council PO Box 237 Christchurch 8003

#### By email

Please email your submission to: ccc-plan@ccc.govt.nz
Please make sure that your full name and address is included with your submission.

#### On the internet

You may enter your submission using the form provided on the Council's web site at: http://www.ccc.govt.nz

Please follow all the instructions on the web site.

Please remember to indicate if you wish to present your submission in person at one of the hearings.

Please ensure your submission arrives no later than Friday 5 May 2006.

# Your submission

You may use this form for your submission on the draft Our Community Plan if you wish. Whether you use this form or not, please include your name, address and contact telephone number with your submission.

one OR -	part of joint sub	mission also	that this written submission	
Are you completing this submission:		✓ For yourself	On behalf of a group or organisation	
If you are represent	ting a group or organisation	, how many people do you r	epresent?	
My submission refe	ers to: Full version	Page No.	Summary version	Page No.
Do you also want to respond to:    Development Contributions    Aquatic Facilities    Other				Other
Contact Name	Lisa Dymano			
Organisation name (if	applicable)			
Contact Address 1099 Ferry Road				
Ferrymead, Christohurch				
Phone No. (day)	Ferymead, Christchurch  (027) 442 2689 Phone No. (evening) (027) 442 2689			
Email (if applicable) dymand@xtra.co.nz				
Signature _	disabyuard Date 05/05/06			

### LONG TERM COMMUNITY COUNCIL PLAN 2006 –2016 Draft Development Contributions Policy

# Submission for the Dymand Family Trust 5<sup>th</sup> May 2006

The Local Government Act provides for a minimum period of one month for submissions. During this period Easter and Anzac weekends occurred, leaving us only a few days to assess the number of items in the Development Contributions Policy that impact the proposed development at 1099 Ferry Road, Christchurch. As a direct result only an initial cost estimate of the financial impact was obtained, making it impossible to understand the cost drivers or even have the opportunity of being involved in a consultative process with the Council.

Council state to "use contributions only for the activity for which they are collected". Review of the Policy provides little explanation or justification for the way particular capital expenditure items in Appendices 3 and 4 are directly related to growth generated from this development. There is insufficient time to seek Council clarification as to their causal relationship, in particular to investigate items planned well before this developments inception (e.g. Ferry Rd/Humphries Drive Intersection, Ferry Road Bridge).

Our planned development consent lodgment date is late August 2006, only 8 weeks after proposed Policy change. Notification of the Policy levy increase during the later stages of planning has a major impact on our project cost model. For example:

- Initial resource consent stated a reserve contribution amounting to \$126,000 the proposed Policy would result in this contribution increasing by well over 100%.
- Development levies for the development significantly increase by \$476,100 or 945%.
- Payment schedule required.

Imposing large levy increases with virtually no notice is contrary to Council's policy objective to "not generally act to discourage development". At this late stage in our development planning we feel that the levy increases cannot be directly passed on to buyers, thus impacting the profitability of the development.

Historically council have imposed minimal rate increases, this policy change imposes a significant levy in a short time frame leading to an unpredictable and inconsistent planning environment. As a developer in this current market, we have concerns over the Council's ability to provide us an equitable outcome or the opportunity to be involved in consultative discussions. The process under which the new Policy is being implemented is clearly contrary to present Council Policy that aims to adopt a business focus that supports the business community and employment, and improve the quality of developments providing quality environments and outcomes for its residents.

There are a number of additional questions the Dymand Family Trust would like answers to before the Policy is passed, including but not limited to:

- Why was there insufficient time to inform developers on the content and effect of the Policy?
- Does the Council fully understand the economic impact the Policy will have on our development, including the impact on profitability and our ability to pass on the cost?
- What is the expected additional demand our development will place on reserves, infrastructure, and community facilities?
- On what basis has the levy attributed to individual capital expenditure items been developed?