

Christchurch City Council – Draft Annual Plan 2008/2009 Draft Fees and Charges

Submission by: Davie Lovell-Smith Ltd

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1. **We submit that the draft Fees and Charges for publicly notified and limited notified resource consent applications are set at a level that may disadvantage some applicants and discourage participation in the planning process.**

We recognise that it is appropriate for the Council to recover costs when processing resource consents however we consider these fees, which are deposits only, should be set in accordance with the criteria in section 36(4) of the Resource Management Act 1991 and should preferably, be set to avoid dissuading potential applicants. The City Plan provisions, which require resource consents in certain situations, have been developed for the public good and people who require resource consent are not always doing so to obtain financial advantage but rather can be carrying out relatively straightforward development. In some cases a resource consent may require public or limited notification over a relatively minor technical matter. In these circumstances a **minimum** fee of \$10,000 for publicly notified and \$5000 for limited notified applications (**doubling the current deposit**) is a significant upfront cost that may be beyond the financial means of some applicants.

We are aware that most councils have set their fees for publicly notified applications at a lower level and question why Christchurch City should have a greater minimum fee for publicly notified applications than other local authorities (see table below). We request therefore that consideration be given to reassessing this minimum fee, providing for payment of these fees progressively during the process, and overall providing for refunds on all fees.

Council	Limited Notified Deposit	Publicly Notified Deposit
Wellington City	3,450	6,600
Dunedin City	2,000	2,000
Manukau City	4,750	6,750
Porirua City	3,000	3,000
North Shore	4,000	7,000

Reassessing Costs -With regard to reassessing costs we understand that it is generally considered good practice in determining “actual costs” for council staff costs to be charged on the basis of their salaries plus overhead costs directly associated with providing that service. It should not include overheads which relate to non-resource consent matters such as the health and safety initiatives, information centres, general staff training, council wide depreciation, council secretariats, financial services etc.

Times for Payment - The three suggested times for payment of fees are:

- At the time of lodging to cover the costs of determining sufficiency of application and the assessment supplied,
- Costs for notification once it has been determined whether there will be no notification, limited notification or public notification,
- Costs for preparation of and holding of hearing

Refunds - Given the possibility that some applications will not incur the stated processing fee provision needs to be made for a refund of the remainder of the fee.

We seek the following

That Council gives consideration to:

1. Reassessing the costs of processing of resource consents, preferably to a level which is affordable and which will not discourage participation in planning processes. In particular the Council could consider adopting a fees scale based purely on staff salaries.
2. Providing for payment of resource consent processing fees in a staged manner to enable payment to occur throughout the process rather than requiring payment of all costs at the time of lodging.
3. Specifically providing for refunds of fees not incurred.

We wish to talk to this written submission



Signed on behalf of Davie Lovell-Smith Ltd

Date 16 April 2008