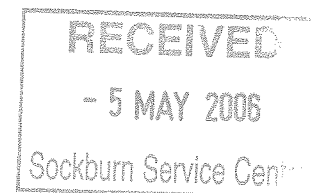


SUBMISSION DRAFT LONG TERM COUNCIL COMMUNITY PLAN

A submission on behalf of D G van Asch, Rock Hill Limited, Halswell Junction Properties Limited.

My submission relates to the Draft Developments Contribution Policy.

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The Submission

The introduction to the LTCCP talks about development or financial contributions that are "a fair and reasonable contribution" and do "not generally act to discourage development".

It is my submission that the increased financial contributions proposed by the Policy are neither fair nor reasonable, and they will act to discourage development. I think that it is fair to apportion increases in costs fairly where they lie, but this policy does not adequately and transparently explain how both the magnitude and allocation of these increases was arrived at. In other words I do not agree that all of the costs, for which the increased financial contributions are proposed to be levied are solely attributable to development.

The time allowed for consultation on the matters raised in this document is insufficient for full understanding of the impact of the Policy given the complexity of the issues raised, and the lack of adequate explanation of how the Council has reached its conclusions (or costs).

Further the aggregated project basis on which these funds are planned to be spent will not achieve equity or fairness for developers or the public in trying to cope with the demands attributed in this document solely to development activity. I believe a project-by-project basis will result in a more equitable identification of benefits and costs and application of funds to avoid, remedy or mitigate any detrimental effects. The accuracy of this methodology will add predictability and certainty about sources and levels of funding.

The Areas of Demand, including cross boundary issues, also appear to be poorly thought out and applied. I find the development contribution policy explaining level of growth, allocation of capital and the cause of/link to expenditure in individual areas of demand inadequately explained.

I have concerns about the determination of development charges. The growth model used makes assumptions that permeate the entire calculation process, and I am not sure that, based on past use of growth models, much reliability can be placed on them.

The explanation of the Household Equivalent Units measure is also inadequate. A population or actual use based approach would be a more fair and equitable way to calculate charges.

The timing of payments as proposed will also create further unfair burdens on developers. These contributions should not be charged at the outset of the subdivision and or development phase. Further the need for multi assessment of the demand throughout development is unnecessary and adds additional expense, further reducing value for money from Christchurch City Council charges.

Remedies:

- a). Allow a further period for consultation that should include opportunities for further detailed explanations of methodologies and calculations.
- b). Throughout the policy establish and explain the link between each activity and the demand it creates, and accurately establish associated costs and benefits from these activities.
- c). Adopt a population based approach for residential HUE and an actual use based approach for commercial HUE.
- d). Correctly annotate the Areas of Demand maps. For example, Map 4 (Surface Water Management) incorrectly shows Census Area Unit 40 in the Heathcote catchment, when large parts of it actually drain to the Halswell catchment.
- e). Change the timing of payment of development contribution levies to the issue of the 224 certificate.
- f). Recognise, give credit for and continue to actively encourage the provision of private measures such as stormwater treatment schemes on private land, that cope with demands from and mitigate the effects of individual development projects.
- g). Add further projects to Appendix 4 including Surface Water Management and Waste Water Collection for LHA deferred zones on Cashmere Road, necessitating identification of a suitable area for stormwater treatment and an extension of wastewater mains from Sparks Road south along Sutherlands Road, then East along Cashmere Road to the deferred zone boundary.

I DO wish to be heard at the hearings 25 May – 7 June 2006, or subsequent hearings.

Signature:



Date:

5/5/06