

Submission on 2006-2016 Christchurch City Council Long Term Council Community Plan

Submission on behalf of: Waterman Investments Limited

Waterman Investments Limited wishes to be heard in regards to the above matter and submits that:

1. The proposed new development contribution policy is unfair and unreasonable and is not based on the increased demand on infrastructure caused by development.

In particular, there is no connection between growth and the need for capital expenditure; no justification for defining the Areas of Demand; and, no link between Areas of Demand and the list of capital expenditure. Furthermore, the relationship between non-residential and residential activities is not clearly identified and relevant economic theory does not support the methodology underpinning the contribution policy.

2. The policy is not transparent and the information supporting the policy is not reasonably accessible.

In particular, the relevant methodology document underpinning the policy is deemed to be confidential, is available for inspection only at Council offices, cannot be provided to third parties without express permission and requires a specialist and comprehensive review to enable a full understanding.

3. The policy conflicts with its stated intention to "ensure that the level of contribution does not generally act to discourage development".

In particular, the policy will result in potentially massive increases in contributions that will form a significant and prohibitively high proportion of total development costs. As such the policy will undermine other Council policies seeking to encourage growth and will have an adverse impact upon new development, business growth and the community.

4. The consultation process has not fulfilled its requirements in terms of the special consultation process required for an LTCCP (s82) and has not provided adequate or reasonable time for parties to fully understand the policy, supporting information and its implications.

In particular, the one month consultation period is considered inadequate for a policy as significant and complex as that proposed, and one which does not provide appeal rights for submitters.


5. Noting the matters above, we submit that the proposed development contribution policy should be withdrawn from the new LTCCP and the existing policy should be retained until such time that an alternative policy is developed under a more extensive and rigorous process of analysis and public consultation.

This submission relates to the full version of the LTCCP. The **submitter wishes to be heard** in support of its submission and reserves the right to further submit on any related issue which comes to hand during the hearing of submissions.

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Signed:



(Signature of submitter or person authorised to sign on behalf)

5 May 2006