

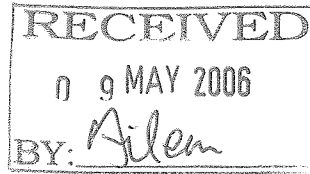


Canterbury Registered Master Builders Association

Building Canterbury Since 1896

03 May 2006

Christchurch City Council
PO Box 237
Christchurch
Attention: Research & Policy



To Whom It May Concern:

Re: Draft LTCCP – Canterbury Registered Master Builders Submission

As background our membership base consists of 200+ builder members in the Christchurch area accounting for approximately 65% of the value of work completed in the construction industry.

On behalf of our members we are presenting this submission to outline some of the concerns we have with the draft and the consultation process. These include:

- 1. Many developers and builders have already committed to developments / buildings priced and sold based on the existing development contribution levy structure. The Draft 2006 LTCCP introduction makes no allowance for these existing contracts (land sale and purchase, building) where consents are not yet in place*
- 2. The consultation needs to consider either a longer introduction timeframe or transitional period to make allowance for these existing agreements*
- 3. How does the council propose to treat applications for building consents that are already lodged with Council but may take longer than the statutory processing period, therefore taking the Consent issue date past the proposed implementation date therefore incurring the additional fees?*
- 4. These additional compliance costs are proposed to be implemented at a time when our industry is already contracting due to the current slowdown of the New Zealand economy. This additional cost will most probably have a detrimental effect on our industry in Christchurch.*

We would request the opportunity to discuss the implications and proposals of the Draft LTCCP further as the implications have a serious impact on our members.

Yours faithfully
Canterbury Registered Master Builders Association


Graeme Earl
Vice President