

## LTCCP 2006-16 Submission - Received by Email

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<b>Sent:</b>	Friday, 11 May 2007 7:28 p.m.
<b>Your Submission:</b>	<p>Submission on Draft 2006-2016 LTCCP Amendments--DCP kg</p> <p>THE SUBMITTER WISHES TO BE HEARD ON THIS SUBMISSION AT THE PUBLIC HEARING</p> <p>The New Zealand Fire Service (NZFS) opposes the proposed amendments to the Christchurch City Council 2006-2016 LTCCP concerned with the establishment of a new development contributions policy (DCP). NZFS believes that the proposed DCP will promote urban development inconsistent with the community outcomes expressed in the LTCCP. Moreover, NZFS believes that the DCP will promote growth patterns inconsistent with the preferred development patterns supported by the vast majority of public submissions during the Greater Christchurch Urban Development Strategy (UDS) public consultation, which favoured policies promoting intensification around existing urban centres. Finally, NZFS believes that the development contributions imposed on inner-city brownfields redevelopment areas will be grossly inconsistent with the actual impacts imposed on existing infrastructure by these new uses.</p> <p>The worked examples of the application of this policy presented by CCC indicate that the development of greenfields residential sites on the outer fringes of the existing urban area, e.g., Halswell, will bear costs no more significant than comparable parcels in established areas, e.g., Shirley, where the impacts of the latter would certainly be no more than minor. Developments in established areas are of vastly different scope, scale and character. Although the proposed DCP admittedly does not incentivise greenfields development it does, by imposing the same costs on vastly different development proposals, encourage wholesale sprawl and suburbanisation. The clearly excessive costs of developing inner-city residential units will almost certainly stifle the development of mixed use projects and diverse alternative and affordable housing inside the four avenues where adequate, albeit ageing infrastructure, exists to support such development.</p> <p>As the NZFS has indicated in a number of previous submissions to CCC and other Greater Christchurch councils, the continued expansion of the urban area compromises the efficiency and effectiveness of emergency service delivery by undermining social capital and increasing demand for services. NZFS has no policy tools available to it besides seeking additional resources from central government to meet these demands. All available mitigation options besides encouraging fire safe behaviour by individuals rests in the hands of local authorities in the form of land use controls, building control regulations, emergency management and asset management plans, and cost recovery mechanisms like development contributions.</p> <p>NZFS urges Council to withdraw the proposed DCP in favour of developing and implementing a more progressive approach to development cost recovery consistent with community outcomes and the UDS principles.</p> <p>Yours faithfully</p> <p>Mark Chubb Assistant Fire Region Commander Chief Fire Officer, Christchurch Transalpine Fire Region mark.chubb@fire.org.nz</p>