

Development Contributions Policy full submission pack

Notes

Submitters highlighted in yellow indicated they wished to speak at a hearing

Contents

Surname	First Name	Organisation	Page number
Copland	Ross	Ferry Hill Trust	2
Fouke	Dr Bernard	Personal	3
Frazer	Judith Frances	WAIORAU NORDIC SKI CLUB	4
Gardner-Hopkins	James	Glenpanel Developments Limited	5
Leaver	Luke		12
O'Malley	Ben C	Millbrook Country Club Limited	13
O'Malley	Ben	Millbrook Country Club Ltd	14
Tariq Ali	Mohammed	RIQ2020LIMITED	15
Williams and Scott	Tim and Julie	Queenstown Lakes Community Housing Trust	16



Respondent No: 9

Login: Anonymous

Email: n/a

Responded At: Jul 29, 2024 00:58:50 am

Last Seen: Jul 29, 2024 00:58:50 am

IP Address: n/a

- Q1. **Full name** Ross Copland
-
- Q2. **Organisation name** Ferry Hill Trust
-
- Q3. **Email address** [REDACTED]
-
- Q4. **Postal address** [REDACTED]
-
- Q5. **Contact phone number** [REDACTED]
-
- Q6. **You have the right to be heard in person before the Council in support of your submission. Do you wish to speak at a hearing?** No
-
- Q7. **Please indicate your position on the proposed amendments to the Development Contributions Policy:** Support
-
- Q8. **Use this space to provide any additional feedback on the proposed amendments to the Development Contributions Policy:**
1. We support greater use of DC's to ensure more equitable funding of infrastructure in the QLDC region. 2. The proposed charges need to significantly increase to cover the full cost of growth infrastructure. A review should be undertaken to ensure the revenue gained better matches the costs of growth (allowing for use of targeted rates, IFF levies and other funding tools). 3. There appears to be significant cross-subsidies between existing and future ratepayers, and between areas of growth. Please review of the DC's to better match growth costs to charges per Dwelling Equivalent in section 3.3 of the policy. 4. Kingston KVL zone charges appear to be vastly under recovering the cost of growth infrastructure. Please review to ensure the pricing is consistent with the policy of ensuring those who benefit pay. 5. Auckland Council recently undertook deep analysis of the DC's policy and charges for Drury. They significantly increased DC's to over \$80k per dwelling unit. This was a very rigorous piece of work and is the best contemporary example I'm aware of. When accounting for Queenstowns far low economies of scale and higher costs of infrastructure delivery, its reasonable to expect to see costs per dwelling equivalent in the order of \$80-100k+GST. This is considerably higher than the DC's proposed indicating that existing ratepayers might still be providing a subsidy to the costs of growth. This is a significant equity issue for many residents and is a key concern for many, particularly when we see it manifest in higher general rates than would otherwise be required.
-
- Q9. **If you have a pre prepared submission, you may upload it here:** not answered
-
- Q10. **I understand that all submissions will be treated as public information.** I understand
-



Respondent No: 6

Login: Anonymous

Email: n/a

Responded At: Jul 26, 2024 17:39:33 pm

Last Seen: Jul 26, 2024 17:39:33 pm

IP Address: n/a

-
- Q1. **Full name** Dr Bernard Fouke
-
- Q2. **Organisation name** Personal
-
- Q3. **Email address** [REDACTED]
-
- Q4. **Postal address** [REDACTED]
-
- Q5. **Contact phone number** [REDACTED]
-
- Q6. **You have the right to be heard in person before the Council in support of your submission. Do you wish to speak at a hearing?** No
-
- Q7. **Please indicate your position on the proposed amendments to the Development Contributions Policy:** Oppose
-
- Q8. **Use this space to provide any additional feedback on the proposed amendments to the Development Contributions Policy:**
- I want to make a strong appeal to the council to reconsider excluding the proposed Wanaka performing arts Centre from the long range plan. The group leading this proposal has the strong support of the community and had the support of the council and I do not understand why it has been left out of the long range plan. This region lacks a professional quality performing arts Centre and this proposed project fulfils a long neglected need for facility. It can host the professional arts and touring professional performance companies. It will not only be an asset for all of the QLDC region's locals that will improve the quality of our life but will also be a very strong tourist attraction and contribute to the economic performance of the region. Please reconsider and again include the performing arts Centre in the long range plan.
-
- Q9. **If you have a pre prepared submission, you may upload it here:** not answered
-
- Q10. **I understand that all submissions will be treated as public information.** I understand
-



Respondent No: 7

Login: Anonymous

Email: n/a

Responded At: Jul 27, 2024 14:25:30 pm

Last Seen: Jul 27, 2024 14:25:30 pm

IP Address: n/a

- Q1. **Full name** JUDITH FRANCES FRAZER
-
- Q2. **Organisation name** WAIORAU NORDIC SKI CLUB
-
- Q3. **Email address** [REDACTED]
-
- Q4. **Postal address** [REDACTED]
-
- Q5. **Contact phone number** [REDACTED]
-
- Q6. **You have the right to be heard in person before the Council in support of your submission. Do you wish to speak at a hearing?** Yes
-
- Q7. **Please indicate your position on the proposed amendments to the Development Contributions Policy:** Support
-
- Q8. **Use this space to provide any additional feedback on the proposed amendments to the Development Contributions Policy:**
- The Waiouru Recreation Reserve requires immediate action QLDC funding to be included in the Long Term Plan (LTP). We ask the Q:LDC to include in the Plan for the provision of a public toilet facility, water supply and ongoing annual support for the maintenance of the toilets, water supply, car parking a trails. Funding for the construction of a larger public day shelter and classrooms facility in 2026/7 should also be included ion the Plan. This is New Zealand's ONLY cross country skiing venue and, as such, should be privy to funding allocation for the local authority, QLDC. This venue attracts international skiers, often as a northern hemisphere training ground and also, as part of the WORLD LOPPET SERIES, to the Merino Muster. Visitors are astounded when they learn that the Snow Farm has no mention in the LTP nor has access to funding. I submit that this HAS to change in favour of the Waiourau Recreation Reserve
-
- Q9. **If you have a pre prepared submission, you may upload it here:** not answered
-
- Q10. **I understand that all submissions will be treated as public information.** I understand
-



Respondent No: 8

Login: Anonymous

Email: n/a

Responded At: Jul 28, 2024 17:46:14 pm

Last Seen: Jul 28, 2024 17:46:14 pm

IP Address: n/a

- Q1. **Full name** James Gardner-Hopkins
-
- Q2. **Organisation name** Glenpanel Developments Limited
-
- Q3. **Email address** [REDACTED]
-
- Q4. **Postal address** [REDACTED]
-
- Q5. **Contact phone number** [REDACTED]
-
- Q6. **You have the right to be heard in person before the Council in support of your submission. Do you wish to speak at a hearing?** Yes
-
- Q7. **Please indicate your position on the proposed amendments to the Development Contributions Policy:** Oppose
-
- Q8. **Use this space to provide any additional feedback on the proposed amendments to the Development Contributions Policy:**
See attached file.
-
- Q9. **If you have a pre prepared submission, you may upload it here:** https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/9a3ffee9b4d870985ec1de7098f6e8e480019e69/original/1722152770/0e8817869b57f7a2dd46b64eba83cc11_Submission_letter.pdf?1722152770
-
- Q10. **I understand that all submissions will be treated as public information.** I understand
-

28 July 2024

DC Policy Submission
 Queenstown Lakes District Council
 Private Bag 50072
QUEENSTOWN 9348

By email: letstalk@qldc.govt.nz

DC POLICY SUBMISSION: GLENPANEL DEVELOPMENTS LIMITED

Introduction

1. I am the project manager for Glenpanel Developments Limited (“**GDL**”).
2. As the Council will be aware, GDL is seeking to develop land on Ladies Mile known as “Flint’s Park”. Regrettably, GDL has been seeking to develop Flint’s Park since at least 2017, when QLDC included the Ladies Mile into Category 2 of the Housing Accords and Special Housing Areas Act 2013 (“**HASHAA**”) Implementation Policy.
3. GDL has since been closely involved (at significant cost) in the QLDC Master planning process, a Fast Track Application process, the Te Pūtahi Ladies Mile Streamlined Planning Process (“**SPP**”), and a further Fast Track Application Process.
4. While the Council desperately needs and now supports the development of houses on Ladies Mile, it has taken considerable effort to get to this point. Housing affordability is an ongoing issue, and the process and holding costs involved have already significantly compromised the ability to deliver affordable housing on the Mile. This will be further compounded if the Council imposes the very significant Development Contributions (“**DCs**”) currently proposed on the Ladies Mile.

DCs proposed for the Ladies Mile

5. The proposed DCs are as follows:

SCHEDULE OF DEVELOPMENT CONTRIBUTIONS PER DWELLING EQUIVALENT REQUIRED BY CONTRIBUTING AREA (EXCLUDING GST)										
Contributing area ¹⁴	Water Supply	Wastewater	Stormwater	Reserve Improvements	Premier Sportsground - Reserve land contribution	Community Infrastructure	Transportation	Transportation - EAR ¹⁵	Total Cash Contribution	Local/Community Reserve Land
Ladies Mile	\$10,958	\$13,323	\$15,642	\$1,182	\$500	\$3,604	\$5,339		\$50,548	

6. A DC for Local/ community reserve land is further required of 17.5m²/ Dwelling Equivalent (“**DE**”). The “updated” median land valuation for reserve contributions has been set, for the eastern¹ (and southern) corridor at: \$855/m², ie \$14,962.50 per household equivalent (“**HE**”). In

¹ Encompassing the Ladies Mile.

██████████ ██████████ ██████████
 ██████████
www.igh.nz

other words, DCs for a single HE at Flint's Park are proposed to be **\$65,510.50**.

7. The current application before a Fast Track Panel is seeking subdivision and land use to enable 370 dwellings. On this basis, DCs would amount to **\$24,238,885.00** for the Project.
8. This is a very significant cost.
9. This is an increase from what the Council's website currently says is the present DC Policy, which sets contributions for the Ladies Mile at **\$15,671** per HE, together with a reserve contribution of 17.5m2/HE valued at \$657/m2 (\$11,497.50), ie **\$27,168.50/HE**. This would have amounted to **\$10,052.345.00** for the Project.
10. In other words, the Council is proposing to increase DCs for Flint's Park by some **141.13%** (or some **2.4x** the current DCs). This is a huge increase.
11. The changes by category of DC are illustrated below, with the proposed DCs provided first, and the previous DCs following:

SCHEDULE OF DEVELOPMENT CONTRIBUTIONS PER DWELLING EQUIVALENT REQUIRED BY CONTRIBUTING AREA (EXCLUDING GST)										
Contributing area ²⁴	Water Supply	Wastewater	Stormwater	Reserve Improvements	Premier Sportsground Reserve land contribution	Community Infrastructure	Transportation	Transportation - EAR ²⁵	Total Cash Contribution	Local/Community Reserve Land
Ladies Mile	\$10,958	\$13,323	\$15,642	\$1,182	\$500	\$3,604	\$5,339		\$50,548	
Ladies Mile	\$4,454	\$2,384	^	\$1,233	\$500	\$3,711	\$3,389		\$15,671	

12. In broad terms, water supply costs have more than doubled (\$4,454 to \$10,958), wastewater costs have increased by over five times from \$2,384 to \$13,323, stormwater has been introduced as a fixed figure of \$15,642,² and transport had increased by a little under double from \$3,389 to \$5,339.
13. While there are a number of identified asset expenditures contained in the schedules, the key cost items for Ladies Mile are a hard to follow, being spread out in that table, and including as follows:

Location	Work Code	Project Name	Capital Cost (\$)	Proportion of the Capital Cost that QLDC proposes to recover through DCs	Proportion of the Capital Cost that QLDC proposes to recover from other sources	Proportion of the Capital Cost that QLDC proposes to recover in the 2024 Policy (over the next 10 years)
Ladies Mile	New Scheme	Ladies Mile HIF Water Supply new scheme	246,350	42%	58%	15%
		Ladies Mile New Scheme (WS) HIF	42,073,678	100%	0%	17%
		Ladies Mile Reservoir & WS trunk mains	105,641	55%	45%	23%
		Ladies Mile Reservoir & WS trunk mains	360,646	55%	45%	23%
Ladies Mile Total			61,299,073	81%	19%	14%
Ladies Mile	New Scheme	Ladies Mile HIF Stormwater new scheme	1,948,097	100%	0%	40%
		Ladies Mile New Scheme (SW) HIF	66,784,845	100%	0%	17%
Ladies Mile Total			68,732,942	100%	0%	18%
		Ladies Mile Network Optimisation (TR)	7,801,047	30%	70%	1%

² Compared to: “^ Development contribution to be confirmed when final planning, design and costing has been completed”.

Principles

14. The purpose of development contributions is set out in s 197AA as follows:

197AA Purpose of development contributions

The purpose of the development contributions provisions in this Act is to enable territorial authorities to recover from those persons undertaking development a fair, equitable, and proportionate portion of the total cost of capital expenditure necessary to service growth over the long term.

15. Section 199 sets out the circumstances which may give rise to a territorial authority requiring a development contribution from a developer. It provides:

199 Basis on which development contributions may be required

(1) Development contributions may be required in relation to developments if the effect of the developments is to require new or additional assets or assets of increased capacity and, as a consequence, the territorial authority incurs capital expenditure to provide appropriately for—

- (a) reserves:
- (b) network infrastructure:
- (c) community infrastructure.

(2) This section does not prevent a territorial authority from requiring a development contribution that is to be used to pay, in full or in part, for capital expenditure already incurred by the territorial authority in anticipation of development.

(3) In subsection (1), effect includes the cumulative effects that a development may have in combination with other developments.

16. Section 197AB sets out the principles that must be taken into account when preparing a development contributions policy under s 106 or requiring development contributions under s 198. Section 197AB(f) states:

197AB Development contributions principles

(1) All persons exercising duties and functions under this subpart must take into account the following principles when preparing a development contributions policy under section 106 or requiring development contributions under section 198:

- (a) development contributions should only be required if the effects or cumulative effects of developments will create or have created a requirement for the territorial authority to provide or to have provided new or additional assets or assets of increased capacity:
- (c) cost allocations used to establish development contributions should be determined according to, and be proportional to, the

persons who will benefit from the assets to be provided (including the community as a whole) as well as those who create the need for those assets;

- (e) territorial authorities should make sufficient information available to demonstrate what development contributions are being used for and why they are being used

General complaint/ submission

17. In respect of the Ladies Mile, as a growth area (finally) being introduced into the District Plan (noting that the TPLM Variation has yet to be confirmed by the Minister), it would have been helpful for the Council to summarise in one place the specific projects relating to Ladies Mile that it is seeking DCs in respect of, and explain what those projects were, rather than just to provide a high level list of names of them.
18. Otherwise, it is impossible to assess whether the required principles for DCs are being met.
19. GDL seeks that the Council provide this sort of summary and explanation, prior to the hearing of submissions, so that the Council meets its statutory obligations and so that GDL can properly understand that the proposed DCs specific to Ladies Mile are being used for, and why.

Specific issues

Stormwater

20. Through the TPLM SPP process, and resulting provisions recommended to the Minister by the SPP hearing Panel, it is clear that each developer is essentially required to address stormwater as part of their development. More technically, a developer is required to demonstrate:
 - How the stormwater management proposed for the subdivision will be managed as part of an integrated stormwater management system for the TPLM Zone and Local Shopping Centre Zone north of SH6 to achieve soakage to ground for the 1% AEP event, including management of overland flow paths and levels of ground surfaces to facilitate the system integration and any legal mechanisms required to achieve integration;
21. It is not understood, how, in such a developer-driven system, how the Council requires some **\$66M** (or so) for stormwater infrastructure. (It is also noted that no DCs for stormwater are proposed to be taken from developers in the southern corridor.)
22. Accordingly, the stormwater contribution is specifically opposed. As with the general information issue identified, above, GDL seeks that the Council explain what stormwater infrastructure is being funded, and why it is necessary in light of the TPLM Variation provisions that have now been recommended.

Wastewater

23. Wastewater is also a significant component of the DCs being proposed for Ladies Mile.
24. The costs may be warranted, but it is impossible on the evidence provided to confirm this.
25. If there is an existing issue with wastewater infrastructure, and the proposed capital expenditure is intended to address that issue, then a portion of the proposed DCs should properly be allocated to existing ratepayers, not growth through DCs.
26. Accordingly, the wastewater contribution is currently also specifically opposed. As with the other information issues identified, above, GDL seeks that the Council explain what new wastewater infrastructure is being funded, and why it is not appropriate for some proportion of the costs of any new wastewater infrastructure to be paid by existing ratepayers.

Reserves

27. The DC Policy proposes to adopt a value for reserve contributions of \$855/m². This is an increase from \$657/m².
28. This is a significant cost, amounting to some **\$316,350** for the current proposal (based on 370 DEs).
29. This is also in the context of where the TPLM SPP provisions require:
 - (a) A 10m public reserve setback for a walk and cycleway fronting the State Highway; and
 - (b) Around the Homestead, a 40m park-buffer before any buildings are allowed.
30. And, in addition, GDL designing and offering up a central east-west green road with a reserve-like pedestrian and cycleway running through that road reserve.
31. Fundamentally, however, GDL does not consider \$855/m² to reflect the true market value of reserve land on the Ladies Mile. It anticipated that the value has remained much more in line with the previous figure used by the Council of \$657/m².
32. Accordingly, the reserve contribution is currently also specifically opposed. As with the other information issues identified above, GDL seeks that the Council explain how it arrived at the \$855/m² for reserve land at Ladies Mile, prior to the hearing of GDL's submission.

Forward progress

- 33. GDL wishes to be heard in respect of its submission.
- 34. In good time prior to the hearing of its submission, it would be very useful if the Council could provide the information requested in this submission.

Yours faithfully



JAMES GARDNER-HOPKINS
Consultant | Advisor | Project Manager

M: [REDACTED] | **T:** [REDACTED] | **E:** [REDACTED]
www.jgh.nz



Respondent No: 3

Login: Anonymous

Email: n/a

Responded At: Jul 16, 2024 13:41:40 pm

Last Seen: Jul 16, 2024 13:41:40 pm

IP Address: n/a

-
- Q1. **Full name** Luke Leaver
-
- Q2. **Organisation name** not answered
-
- Q3. **Email address** [REDACTED]
-
- Q4. **Postal address** [REDACTED]
-
- Q5. **Contact phone number** [REDACTED]
-
- Q6. **You have the right to be heard in person before the Council in support of your submission. Do you wish to speak at a hearing?** No
-
- Q7. **Please indicate your position on the proposed amendments to the Development Contributions Policy:** Oppose
-
- Q8. **Use this space to provide any additional feedback on the proposed amendments to the Development Contributions Policy:**
not answered
-
- Q9. **If you have a pre prepared submission, you may upload it here:** not answered
-
- Q10. **I understand that all submissions will be treated as public information.** I understand
-



Respondent No: 1

Login: Anonymous

Email: n/a

Responded At: Jul 08, 2024 09:11:39 am

Last Seen: Jul 08, 2024 09:11:39 am

IP Address: n/a

- Q1. **Full name** Ben C O'Malley
-
- Q2. **Organisation name** Millbrook Country Club Limited
-
- Q3. **Email address** [REDACTED]
-
- Q4. **Postal address** [REDACTED]
-
- Q5. **Contact phone number** [REDACTED]
-
- Q6. **You have the right to be heard in person before the Council in support of your submission. Do you wish to speak at a hearing?** Yes
-
- Q7. **Please indicate your position on the proposed amendments to the Development Contributions Policy:** Neutral
-
- Q8. **Use this space to provide any additional feedback on the proposed amendments to the Development Contributions Policy:**
- Millbrook Country Club Limited (MCCL) would like it acknowledged within the new Development Contributions policy, that through the following documents, MCCL has agreed different outcomes on various components of Development Contributions: • An agreement between MCCL and QLDC dated 7 July 1994 relating to Water Supply • An agreement between MCCL and QLDC dated 7 July 1994 relating to Sewer • Stakeholders Deed between MCCL and QLDC dated 5 June 2007 relating to Water, sewer, stormwater, Reserve Land, Community Facilities and Reserve Improvements
-
- Q9. **If you have a pre prepared submission, you may upload it here:** not answered
-
- Q10. **I understand that all submissions will be treated as public information.** I understand
-



Respondent No: 2
Login: QLDC Let's Talk Team
Email: letstalk@qldc.govt.nz

Responded At: Jul 16, 2024 09:52:08 am
Last Seen: Jul 15, 2024 23:09:08 pm
IP Address: [REDACTED]

- Q1. **Full name** Ben O'Malley
-
- Q2. **Organisation name** Millbrook Country Club Ltd
-
- Q3. **Email address** [REDACTED]
-
- Q4. **Postal address** not answered
-
- Q5. **Contact phone number** [REDACTED]
-
- Q6. **You have the right to be heard in person before the Council in support of your submission. Do you wish to speak at a hearing?** Yes
-
- Q7. **Please indicate your position on the proposed amendments to the Development Contributions Policy:** not answered
-
- Q8. **Use this space to provide any additional feedback on the proposed amendments to the Development Contributions Policy:**
- Millbrook Country Club Limited (MCCL) would like it acknowledged within the new Development Contributions policy, that through the following documents, MCCL has agreed different outcomes on various components of Development Contributions: • An agreement between MCCL and QLDC dated 7 July 1994 relating to Water Supply • An agreement between MCCL and QLDC dated 7 July 1994 relating to Sewer • Stakeholders Deed between MCCL and QLDC dated 5 June 2007 relating to Water, sewer, stormwater, Reserve Land, Community Facilities and Reserve Improvements
-
- Q9. **If you have a pre prepared submission, you may upload it here:** not answered
-
- Q10. **I understand that all submissions will be treated as public information.** I understand
-



Respondent No: 4

Login: Anonymous

Email: n/a

Responded At: Jul 16, 2024 19:17:48 pm

Last Seen: Jul 16, 2024 19:17:48 pm

IP Address: n/a

Q1. Full name	Mohammed Tariq Ali
Q2. Organisation name	RIQ2020LIMITED
Q3. Email address	[REDACTED]
Q4. Postal address	[REDACTED]
Q5. Contact phone number	[REDACTED]
Q6. You have the right to be heard in person before the Council in support of your submission. Do you wish to speak at a hearing?	No
Q7. Please indicate your position on the proposed amendments to the Development Contributions Policy:	Support
Q8. Use this space to provide any additional feedback on the proposed amendments to the Development Contributions Policy:	not answered
Q9. If you have a pre prepared submission, you may upload it here:	not answered
Q10. I understand that all submissions will be treated as public information.	I understand



Respondent No: 5

Login: Anonymous

Email: n/a

Responded At: Jul 26, 2024 08:39:58 am

Last Seen: Jul 26, 2024 08:39:58 am

IP Address: n/a

- Q1. **Full name** Tim Williams / Julie Scott
-
- Q2. **Organisation name** Queenstown Lakes Community Housing Trust
-
- Q3. **Email address** [REDACTED]
-
- Q4. **Postal address** not answered
-
- Q5. **Contact phone number** [REDACTED]
-
- Q6. **You have the right to be heard in person before the Council in support of your submission. Do you wish to speak at a hearing?** Yes
-
- Q7. **Please indicate your position on the proposed amendments to the Development Contributions Policy:** Oppose
-
- Q8. **Use this space to provide any additional feedback on the proposed amendments to the Development Contributions Policy:**
See attached
-
- Q9. **If you have a pre prepared submission, you may upload it here:** https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/b3c485d21df274f7f873b44a7d073abfad288b3e/original/1721947193/82baf2fa5c718017ec5f74a8f34c10db_QLCHT_submission_QLDC's_Proposed_Amendments_to_DC_Policy_26_July_2024.pdf?1721947193
-
- Q10. **I understand that all submissions will be treated as public information.** I understand
-

26 July 2024

QUEENSTOWN LAKES COMMUNITY HOUSING TRUST SUBMISSIONS ON - DRAFT POLICY ON DEVELOPMENT CONTRIBUTIONS

- Please find set out below a submission on behalf of Queenstown Lakes Community Housing Trust (QLCHT).
- QLCHT wishes to speak at a hearing in relation to its submissions.

QLCHT is well established as the principal provider of affordable and community housing in the Queenstown Lakes District, with both the experience and resources to deliver a range of housing options to low-moderate income residents. QLCHT is a registered Community Housing Provider with the Community Housing Regulatory Authority.

Of particular relevance to this submission, QLCHT is currently developing a comprehensive housing development at Jopp Street in Arrowtown (known as Tewa Banks) consisting of 68 houses ranging from 1 bedroom to 4-bedroom houses. Figure 1 below illustrates the development. The development is consented with physical works well underway. The first houses are expected to be completed September 2024.



Figure 1: Jopp Street Comprehensive Development

As part of completing the development, development contributions ("DC's") are required to be paid. QLCHT has sought to have the DC assessed on a multi-unit rather than a single lot basis, given the comprehensive nature and density of the building development and because the resultant residential units are more compact than a 'traditional' sized house.

Assessment of the development on a multi-unit basis (and therefore bringing the ground floor area ("GFA") into the calculation) rather than individual lot basis would equate to a significant difference in the DC's payable because the houses proposed in the development are much smaller than the 180m² dwelling equivalent used in the policy.

The Development Contribution Policy ("DCP") definition for a multi-unit is as follows:

*Any development that involves the development of three or more residential units/apartments **within a single site**, with at least one shared wall. (emphasis added).*

In the case of Tewa Banks, a subdivision consent has been sought and granted for the development (as have building consents). As a result the Tewa Banks development does not meet the DCP's definition of multi-unit.

As a consequence QLDC has advised they cannot assess DC's payable for Tewa Banks on a multi-unit basis.

The rationale and justification for DC's is that they should be taken for the *actual demand* created. As such, it is neither fair nor reasonable to require a development, such as Tewa Banks to pay a higher contribution based on what is really a technicality, in that there has been a subdivision applied for contemporaneously with land use. The demand is no different just because the subdivision has been sought, the actual demand will be generated by the land use – that is, the houses being built.

It is considered a better design and overall quality of outcome (which is encouraged by QLDC) to provide for developments like Tewa Banks to be designed and implemented on a comprehensive basis, i.e. including both land use and subdivision. Therefore, the DC payable for Tewa Banks should reflect the comprehensive nature of the development and *actual demand* created.

AMENDMENTS SOUGHT

Amend the definition of Multi-Unit Residential

An amendment to the definition is sought to enable comprehensive developments such as Tewa Banks being developed by QLCHT to be assessed as multi-unit developments. The following amendment is proposed (additions underlined):

Any development that involves the development of three or more residential units/apartments within a single site or where not in a single site has resource consent for both land use and subdivision issued contemporaneously, with at least one shared wall. This does not include additions, alterations or accessory buildings.

An alternative option to amending the definition of multi-unit residential would be to add another definition specifically to provide for housing developed by QLCHT (called Community Housing) similar to the separate definition provided for Elderly Care Home and Retirement Villages, given housing undertaken by QLCHT is clearly distinguishable from general housing developments in a similar way to Elderly Care Homes and

Retirement Villages where, despite subdivision into small titles, ownership is of a type similar to occupation right agreements. A suggested definition is:

'Community Housing' means affordable housing with a retention mechanism in place to ensure the housing remains affordable in perpetuity. For the purposes of this definition, affordable housing means housing where the cost to rent or own is within the reasonable means of low-medium income households.

This new definition would be added to the glossary of terms and also added to Table 3.4.1 Dwelling Equivalent Calculation Table by adding this category to the row for retirement units. This would mean that both retirement units and Community Housing would be assessed by number of bedrooms (i.e. 1 bedroom, or 2 or more bedrooms).

Should you have any queries regarding this submission please do not hesitate to contact me.

Regards



Tim Williams

