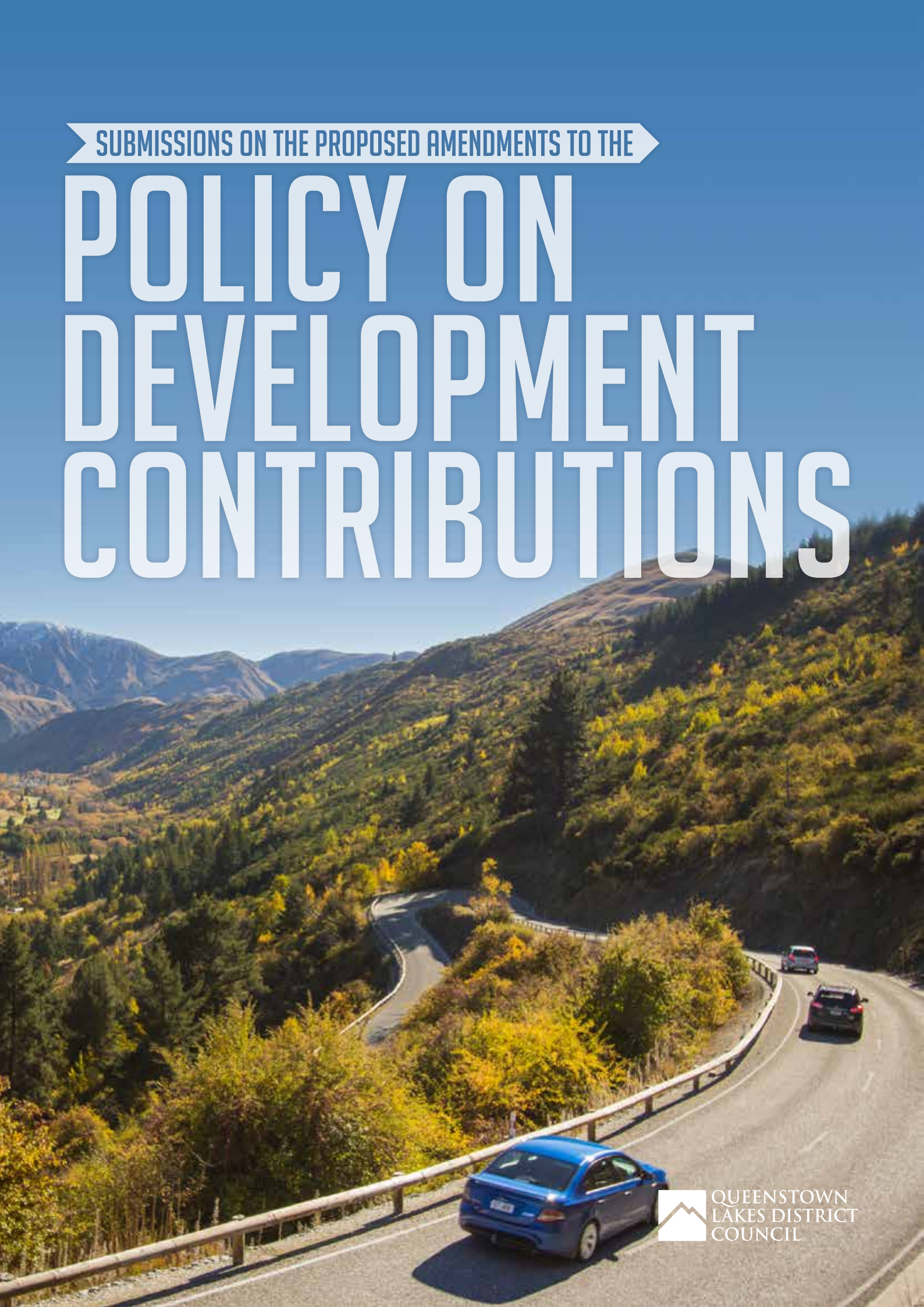
SUBMISSIONS ON THE PROPOSED AMENDMENTS TO THE

POLICY ON DEVELOPMENT CONTRIBUTIONS



QUEENSTOWN LAKES DISTRICT COUNCIL

STATEMENT OF PROPOSAL

Proposed Amendments to the Policy on Development Contributions

Proposal

In accordance with section 102 (4) (b) of the Local Government Act 2002 (LGA), the Queenstown Lakes District Council (QLDC or Council) has begun consultation on amendments to the Policy on Development Contributions. The reason for the amendment is to simplify and clarify areas of the policy that have not been amended since they were first enacted in either the 2004, 2012 or 2015 Policy.

As well as the annual update of contribution levels as a result of the incorporation of the latest actual expenditure and the revised capital programme proposed by the Annual Plan 2017/18, the additional proposed amendments to the Policy on Development Contributions include:

1. Clarification around when QLDC intends to assess development contributions when a development has both a resource and building consent.
2. Remove the 2012 requirement to recalculate development contributions after 24 months.
3. Clarification of when a development contribution charge is reviewed
4. Amendment to Country Dwelling Category in the Dwelling Equivalent Calculation Table.
5. Change to the methodology of how non-residential developments are assessed when no known Gross Floor Area at subdivision stage and removal of reference to land use.
6. Amendment of the multi-unit residential development definition to include reference to apartments.
7. Include the rates Residential flat definition to provide clarification on when a development contribution is required under either a Resource Consent or Building Consent.
8. Update the Greenfield and Brownfield definitions as they relate to reserve land requirements.
9. Unusual Development definition to allow Council to assess those developments that have unusual demand characteristics.
10. Include reference to the ability of Council to withhold a certificate of acceptance under the Building Act as per S198(4A) of the Local Government Act (LGA).
11. Simplification and clarification of when the three credit types apply.

It is proposed that these changes will apply to any application for resource consent, building consent or application for service connection lodged on or after 1 July 2017

Consultation Timeline

The LGA allows Council to amend the Policy on Development Contributions at any time in accordance with section 102 (4) (b) of the Local Government Act 2002. The consultation undertaken must be in accordance with section 82 (Principles of Consultation). There is no requirement to use the Special Consultative Procedure (SCP), however, intend to handle the consultation in parallel with the Annual Plan process:

24 March 2017	Approval to commence consultation
27 March 2017	Commence consultation
28 April 2017	Consultation ends
31 May to 1 June, 2017	Hearing of submissions
29 June 2017	Final decision on proposal

Submissions close on **Friday 28 April, 2017**. Submissions can be made online www.qldc.nz or emailed to services@qldc.govt.nz.

PART A - PROPOSED CHANGES TO THE POLICY

SUMMARY OF PROPOSED AMENDMENTS TO DEVELOPMENT CONTRIBUTIONS

The following changes are proposed to the Policy on Development Contributions in order to provide greater clarity around certain aspects of the policy.

It is proposed that these changes will apply to any application for resource consent, building consent or application for service connection lodged on or after 1 July 2017.

Amendment 1 – Clarification of when a development contribution will be assessed when a development has both a resource consent and building consent

OVERVIEW - (Page 139 –new text shown as underlined) (Page 147 of the 16/17 Policy)

The current overview section does not clarify when QLDC will assess a development contribution on developments that have both a resource consent and a building consent for the same activity, Accordingly, the policy now clarifies that land use consents that require a building consent to give effect to the development will be assessed under the relevant building consent once the final plans and gross floor areas of the development are confirmed.

Development contributions may be sought in respect of any development that generates a demand for reserves, network or community infrastructure. Council will assess whether development contributions are payable in relation to the development when an application for one of the following is made:

i. Resource Consent
ii. Building Consent
iii. Authorisation for a Service Connection

When a development has both a resource consent and building consent, QLDC intend to assess DC's on the consent that contains all the required information to make the correct assessment, for example subdivisions creating newly serviced lots will be assessed at the subdivision resource consent stage and land use consents that require a building consent to give effect to the development will be assessed under the relevant building consent once the final plans and gross floor areas of the development are confirmed. For land use consents with no related building consents (i.e. registration of a building platform and some change in use consents) will be assessed at the land use resource consent stage.

This policy has been prepared to meet the requirements of Section 106(2) of the LGA 2002. The full methodology that demonstrates how the calculations for development contributions were made is contained in a separate document which is available to the public as per section 106 (3) of the Act

Amendment 2 - Reassessment of Development Contributions after 24 months

The 2012 Policy introduced a provision to recalculate unpaid development contributions after 24 months. However the 2014 Local Government Act amendments which introduced s198(1) made that provision ultra vires, Accordingly, Reassessment of Development Contributions after 24 months is deleted from the policy.

CHANGES TO ASSESSMENT POLICY 2012 - (Page 140 – deleted text shown struck out) (Page 149 of the 16/17 Policy)

~~**CHANGES TO ASSESSMENT POLICY 2012**~~

~~Council has revised the development contribution policy process to allow for the recalculation of unpaid development contributions. Before 2012, an assessment of contributions payable was made at the time the consent was issued and this assessment stood for the duration of a valid consent. Under revised policy, if development contributions are not paid within 24 months of a consent being issued contributions will be recalculated under the latest version of the policy.~~

~~Effectively this means that any Development Contribution Notice (DCN) is valid for 24 months from the time of issue:~~

~~All DCN's issued after 1 July 2012 will be valid for 24 months from the date of issue and then recalculated for payment under the policy relevant at that time.~~

Amendment 3 – Clarification of when a development contribution charge is reviewed

NOTES - (Page 144 – deleted text struck out, new text shown as underlined) (Page 152 of the 16/17 Policy)

The notes section requires clarification of when QLDC intends to review its development contribution charges. Accordingly, the following deletion and amended wording is proposed to be included in the Policy:

Notes:

1. Development Contributions for water supply, wastewater, stormwater, reserves and community facilities have been assessed and will be collected using the LGA 2002 from 1 July 2004.
2. Transportation development contributions have been assessed and will be collected using the LGA 2002 from 1 July 2006.
3. Development contributions are triggered and may become payable on the granting of:
   a. A Resource Consent.
   b. A Building Consent.
   c. An authorisation for a service connection.

~~As the sequence of development is not always consistent, development contributions shall be required at the first available opportunity. At each and every subsequent opportunity the development will be reviewed and additional contributions required if the units of demand assessed for the development exceed those previously paid for.~~ Those Sites that apply for consents that result in additional demand beyond what has been assessed will be reviewed and further contributions required if the units of demand exceed those previously paid for

Amendment 4 – Amendment to Country Dwelling Category in the Dwelling Equivalent Calculation Table

The Country Dwelling component of the dwelling equivalent calculation table is updated to remove reference to water supply, wastewater and stormwater supply as Country Dwelling sites are typically in rural general zones with no Council reticulation available. Accordingly, 1 DE per Dwelling is deleted from the table and replaced with n/a in the Policy:

DWELLING EQUIVALENT CALCULATION TABLE - (Page 146 – deleted text shown struck out, new text shown as underlined) (Page 154 of the 16/17 Policy)

	Water Supply		Wastewater	Stormwater	Reserve Improvements and Community Facilities		Reserve Land		Transportation		Transportation – Eastern Access Road
Category	**Dwelling Equivalents per 100m² GFA**	**Plus Network Factor Dwelling Equivalents**	**Dwelling Equivalents per 100m² GFA**	**Dwelling Equivalents per 100m² Impervious Surface Area**	**Dwelling Equivalents per 100m² GFA for Wakatipu**	**Dwelling Equivalents per 100m² GFA for Wanaka**	**Dwelling Equivalents per 100m² GFA for Wakatipu**	**Dwelling Equivalents per 100m² GFA for Wanaka**	**Dwelling Equivalents per 100m² GFA for Wakatipu**	**Dwelling Equivalents per 100m² GFA for Wanaka**	**Dwelling Equivalents per 100m² GFA**
Residential	1 Dwelling Equivalent (DE) per Dwelling Unit										
Residential Flat	0.37	0.40	0.62	0.38	0.62	0.62	0.62	0.62	0.62	0.62	0.62
Multi-Unit Residential	0.37	0.40	0.62	0.38	0.62	0.62	0.62	0.62	0.62	0.62	0.62
Accommodation	0.25	1.30	0.50	0.38	0.90	1.71	0.90	1.71	1.72	2.17	1.36
Commercial	0.16	1.17	0.20	0.38	0.04	0.06	0.00	0.00	2.15	2.56	2.99
Industrial	0.16	1.17	0.20	0.38	0.04	0.06	0.00	0.00	1.04	1.19	0.88
Country Dwelling	~~1 DE per Dwelling~~ n/a		~~1 DE per Dwelling~~ n/a	~~1 DE per Dwelling~~ n/a	1 DE per Dwelling		0.66 DE's per Dwelling		1.34 DE's per Dwelling	3.01 DE's per Dwelling	-
Other	To be individually assessed at the time of application										-
CBD Accommodation	0.25	1.30	0.50	0.38	0.90	1.71	0.90	1.71	1.72	2.17	-
CBD Commercial	0.16	1.17	0.20	0.38	0.04	0.06	0.00	0.00	2.15	2.56	-
Mixed Use Accommodation	1 DE per Dwelling		1 DE per Dwelling	0.38	0.78	0.95	0.78	0.95	1.30	1.38	0.81
Mixed Use Commercial	1 DE per Dwelling		1 DE per Dwelling	0.38	0.78	0.95	0.59	0.71	0.97	0.99	1.21
Primary Industry	1 DE per Dwelling		1 DE per Dwelling	1 DE per Dwelling	1 DE per Dwelling		0.66 DE's per Dwelling		1.69 DE's per 27Ha	1.83 DE's per 41Ha	-
Restaurant/Bar	0.83	1.17	0.46	0.38	0.04	0.06	0.00	0.00	2.15	2.56	2.99
Unusual Developments	To be individually assessed at the time of application - refer to page 159 for definition										-

Amendment 5 - Change to the methodology of how non-residential developments are assessed at subdivision stage

The current methodology assesses non-residential developments with no known Gross Floor Area on building coverage and number of floors, this amendment intends to move to a simpler method of assessment. Additionally, as this methodology only applies at subdivision stage reference to land use is removed. Accordingly, the following is proposed to be included in the Policy:

LAND USE DIFFERENTIALS - (Page 147 – deleted text shown struck out, new text shown as underlined) (Page 155 of the 16/17 Policy)

If the Gross Floor Area (GFA) is unknown, which may be the case at the subdivision ~~or landuse consent~~ stage, then the following table will be used to estimate the GFA.

~~Category~~	~~Building Coverage~~	~~No. of Floors~~
~~Residential~~	~~Assume 160m² per Dwelling Unit~~	
~~Accommodation~~	~~55%~~	~~2~~
~~Commercial~~	~~75%~~	~~1~~
~~Industrial~~	~~30%~~	~~1~~
~~Country Dwelling~~	~~Assume 160m² Dwelling Unit~~	
~~CBD Accommodation~~	~~80%~~	~~2~~
~~CBD Commercial~~	~~80%~~	~~2~~
~~Mixed Use Accommodation~~	~~55%~~	~~1~~
~~Mixed Use Commercial~~	~~55%~~	~~1~~
~~Primary Industry~~	~~Assume 160m² per Dwelling Unit~~	
~~Restaurant/Bar~~	~~Use Commercial or CBD Commercial~~	

~~Note: When an estimate of the GFA is used in the development contribution assessment then Council will only charge 75% of the calculated contribution at this stage.~~

Land Use	Estimated GFA (or equivalent)	Impervious Surface Area (ISA) - used for stormwater calculation
Residential	One dwelling equivalent per lot.	One dwelling equivalent per lot.
Rural Lifestyle and Rural Residential	One dwelling equivalent per lot.	One dwelling equivalent per lot.
Rural General	One Country dwelling equivalent per lot - (refer to the Dwelling Equivalent Calculation Table on page 154)	One Country dwelling equivalent per lot - (refer to the Dwelling Equivalent Calculation Table on page 154).
Non-residential: Commercial / Industrial/restaurant/Bar/ Visitor Accommodation	• 50m² gross floor area for lots <= 500m² • 100m² gross floor area for lots > 500m² <= 2,000m² • 400m² gross floor area for lots >2,000m	• 62.5m² ISA for lots <= 500m². • 125m² ISA for lots > 500m² <= 2,000m² 500m² ISA for lots >2,000m

Amendment 6 - Multi-Unit Residential Development definition

The current definition refers to 'three or more residential units' which suggests that only single dwellings can benefit from the multi-unit category, apartments is also added to ensure clarity around its inclusion. Accordingly, the following definition is proposed to be included in the Policy:

Multi Unit Residential Developments (Page 147 – additional wording underlined) (Page 155 of the 16/17 Policy)

This relates to any development that involves the development of three or more residential units/apartments within a single site, it does not include additions, alterations or accessory buildings.

When assessing the number of dwelling equivalents for multi-unit developments, instead of allowing one dwelling equivalent per unit, the assessment will be done using the GFA of the development and the multi-unit residential differentials shown in the above table. This method more clearly defines the impact of multi unit residential developments when compared to visitor accommodation and will make most developments of this type more affordable.

Amendment 7 - Residential Flat definition

The Building Act and District Plan do not share a singular definition of a residential flat, resulting in confusion for applicants as to when a residential flat development contribution will be triggered, a single definition is therefore proposed, utilising the existing rates definition and the District Plan definition of a kitchen. Accordingly, the following definition is proposed to be included in the Policy:

RESIDENTIAL FLATS (Page 147 – deleted text shown struck out, new text shown as underlined) (Page 155 of the 16/17 Policy)

~~When assessing the number of dwelling equivalents for residential flat developments instead of allowing one (or half) dwelling equivalent per unit the assessment will be done using the GFA of the flat and the residential flat differentials shown in the above table. This method more clearly defines the impact of residential flats and will make them more affordable.~~

The Queenstown Lakes District Council requires development contributions to be assessed for all residential flats.

A residential flat for the purposes of this policy is a residential building or part of a residential building that is used, or can be used as independent residence containing its own kitchen, living and toilet bathroom facilities that is secondary to the main residence. Note: the definition of a kitchen comes from the District Plan.

Dwelling equivalents for residential flats will be calculated using the GFA of the residential flat and the differentials shown in the above table.

Amendment 8 - Reserve Land definition

The current definition requires streamlining and simplifying to ensure the Greenfield and Brownfield definitions are clearly understood. In addition, all residential flats are to be defined as brownfield regardless of the land zoning; this will make them more affordable. Accordingly, the following definition is proposed to be included in the Policy:

RESERVE LAND CONTRIBUTION - (Page 147 – 149 – deleted text shown struck out, new text shown as underlined) (Page 155 - 157 of the 16/17 Policy)

A portion of development contributions paid to Council is utilised for the provision and improvement of reserve land within the Queenstown Lakes District. It is Council's aim to have adequate provision of accessible reserve land of high quality to serve its growing population. However, the reserve land development contribution level is significant relative to the cost of an overall development and can have an adverse effect of deterring investment in development within the Queenstown Lakes District.

This can be one of the barriers towards the provision of affordable housing. Through this policy, Council will ensure reserve land contributions are only applicable where there is currently limited provision. The following Reserve Land Contribution Policy has been established based on how the District is currently served by accessible reserve land, and how Council aims to meet demand for future provision of reserves.

The Queenstown Lakes District currently has a publicly accessible park provision of approximately 1,813 hectares. Based on a usual resident population of 29,500 this equates to 61.45 hectares of park per 1000 residents. This level of service is significantly higher than the national average of approximately 21 hectares per 1000 residents and while it is desirable to maintain the current ratio of recreational land to population, it is not considered necessary to increase the level of recreational land provision per capita unless to enable a specific recreation asset (e.g. sports fields) that cannot be accommodated within existing reserve land or is to service new developments in Greenfield sites.

Existing residential areas enjoy a good provision of local parks, sports fields, esplanade strips adjoining lake and river margins, lakeside beaches, significant walking and biking trails, and track network and surrounding Department of Conservation reserves. Queenstown Lakes District residents and visitors use a mix of different types of these reserve areas for a variety of active and passive recreation purposes.

Although provision of land used for recreation purposes is high, much of the land is underdeveloped and continual improvement is required to ensure reserve land is functional and of high quality. This generates the ongoing need for development contributions for reserve improvements as new developments continue to increase the usage of reserves across the District.

Whilst development contributions for reserve improvements remain applicable, in respect to the future requirement for obtaining reserve land, there is scope to reduce development contributions for reserve land acquisition in residential areas that currently have adequate reserve provision. This revised policy looks to ensuring that land acquisition only occurs when real demand exists and also ensures that maintenance costs for reserve land are sustainable~~. the reduction of ongoing maintenance costs for unnecessary reserve land that would be borne by ratepayers.~~

For new developments within areas that do not have adequate reserve provision there will be a need for additional reserves to meet the recreational demand of the new residents in those areas. Accordingly, development contributions for reserve land will continue to be required in these areas.

The land contribution has been assessed at 27.5m2 for each residential property that requires a reserve land contribution component. In this policy the term 'residential' includes visitor accommodation.

The below helps identify those areas which are deemed to have reserve land take requirements.

~~**Greenfield Sites**~~

~~The land contribution has been assessed at 27.5m2 for each residential property that requires a reserve land contribution component[2]. In this policy the term 'residential' includes visitor accommodation[3]. This provision has been reviewed and is still considered appropriate. This land contribution will remain applicable to development of 'Greenfield' sites where development will result in increased population and the associated demand for accessible reserve provision.~~

~~'Greenfield' sites are considered to be undeveloped land parcels that do not have existing subdivision consents for future residential development by the time this policy has been adopted). Special Housing Areas (SHAs) and undeveloped land proposed to be subdivided in District Plan Special Zones are also considered Greenfield sites.~~

~~Generally, 'Greenfield' developments are in areas with rural zoning. Where development is proposed that will create new land parcels in urban areas (urban areas in this policy are all zones apart from rural type zones) that do not have existing subdivision consents for future residential development by the time this policy has been adopted, consideration for reserve land contributions will be on a case by case basis.~~

~~Consideration will be given as to whether there is existing accessible reserve land, and to whether this reserve land is of an appropriate size and purpose relative to the size of the proposed development. For a reserve to be 'accessible' it is considered it should generally be within 800m of a property it serves and easily accessible by foot. Council retains discretion on the consideration of what is appropriately accessible in any given case. For reserve land to meet its purpose for recreation it would generally include reserve areas that can be used for active and passive recreation including open park spaces usable for play activities. To avoid doubt, suitable recreation reserves do not include esplanade reserves, drainage reserves or public walkways with ROW easements in favour of Council.~~

~~At Council's discretion, the land contribution will be 27.5m2 for each residential property. If existing reserves are of adequate size (greater than or equal to 27.5m2 per residential unit) and purpose, and are accessible (within 800m by foot of each residential unit) to the proposed development then generally no reserve land contributions are to be made.~~

~~**Country Dwelling Greenfield Sites**~~

~~In Rural Zones where the lots developed/subdivided are greater than 4000m², these lots will be subject to a reduced level of development contributions for reserve land contributions as the demand for reserve land tends to be less than the demand generated by new land parcels that are of a smaller size and within more highly developed areas. Land contribution in lieu of cash contributions will generally not be accepted for these type of developments/subdivision. The establishment of piecemeal reserve land parcels spread through rural areas is undesirable as is generally not accessible to the recreational demand and therefore cash contributions will be applicable to enable Council to acquire the most suitable land to serve the needs of the community.~~

~~**Brownfield Sites**~~

~~We have a good provision of accessible reserve land in our developed urban areas. As such there is an opportunity to reduce development contributions for reserve land acquisition in these areas. Reserve land contributions will therefore not be applicable to development of 'Brownfield' sites. 'Brownfield' sites are considered to be existing land parcels proposed for residential development or that have subdivision consents for future residential development by the time this policy is adopted, and that are within existing urban areas.~~

Greenfield in urban areas

Where residential development is proposed in **urban areas**[1] and does not have resource consent for future development by 1 July 2017, consideration for reserve land contributions will be on a case by case basis.

Consideration will be given to whether there is existing **accessible**[2] reserve land within 800m of the site, and whether the reserve is of an appropriate size and **purpose**[3] relative to the proposed development and existing surrounding developments.

Greenfield in rural areas

Where residential development is proposed in **rural areas**[4] and does not have resource consent for future development by 1 July 2016, consideration for reserve land contributions will be on a case by case basis.

Consideration will be given to whether there is existing **accessible** reserve land within 800m of the site, and whether the reserve is of an appropriate size and purpose relative to the size of the proposed development and surrounding development.

Should these lots be required to pay a Reserve Land contribution, and not connected to Councils water or wastewater reticulation and are larger than 4000m^2 they will be assessed under the Country Dwelling category and subject to a reduced level of reserve land development contributions as the demand for reserve land tends to be less than the demand generated by new land parcels that are smaller and within more highly developed areas.

As the establishment of piecemeal reserves through rural areas is undesirable, land contributions in lieu of cash contributions will not be accepted for this type of development/subdivision.

Brownfield Sites

Brownfield sites are developed land parcels in urban areas that contain existing development or have been subdivided previously for residential purposes.

The Queenstown Lakes District has good provision of accessible reserve land in developed urban areas. As such there is an opportunity to reduce development contributions for reserve land in these areas. Reserve land contributions will therefore not be applicable to the development of Brownfield sites.

In addition, there is a desire to encourage infill development in respect of residential flats, so neither urban nor rural sites will be required to pay reserve land contributions for a residential flat that accompanies a primary dwelling.

Note

[1] Urban areas in this policy are all zones that are not zoned Rural General, Rural Residential or Rural Lifestyle)

[2] For a reserve to be 'accessible' it is considered it should easily accessed by pedestrians. Council retains discretion on the consideration of what is appropriately accessible in any given case.

[3] For reserve land to meet its purpose for recreation, it includes reserve areas that can be used for active and passive recreation including flat, open park spaces usable for play activities e.g. kicking a ball. To avoid doubt, reserves do not include Department of Conservation land, Ministry of Education land, road reserves, esplanade reserves, drainage reserves or public walkways with ROW easements in favour of Council.

[4] Rural areas in this policy are Rural General, Rural Residential or Rural Lifestyle zones

Amendment 9 - Unusual Development definition

There is an existing clause under Postponement and Remission that enables an applicant to request a special assessment based on a development having unusual demand characteristics, however this definition does not enable Council to apply the same principles. Accordingly, the following definition is proposed to be included in the Policy including an update to the 'Development Contributions per Dwelling Equivalent required by Contributing Area' table:

Unusual Developments Definition – (Page 151 – new text shown as underlined) (Page 159 of the 16/17 Policy)

Postponement or Remission

Council may allow for postponement or remission of contributions in the following circumstances:

a) A Council may accept or require a contribution to the equivalent value in the form of land or infrastructure. It may be appropriate, for example, to allow reserve assets to vest in Council through the subdivision consent process, where they meet Council's reserve requirements, and credit them against the contributions
b) Where an applicant can demonstrate that a development creates a significantly different demand on infrastructure than could usually be expected under the relevant land use category, Council will individually assess any such development taking into account the unusual demand characteristics.

All applications for Postponement or Remission must be made in writing to the Chief Executive Officer of the Council.

Unusual Developments

The QLDC reserves the right to individually assess contributions on any development that it deems to create a significantly different demand on infrastructure than could usually be expected under their relevant land use category. This may include a development that the QLDC deems does not it into the land use categories

And

Development Contributions per Dwelling Equivalent required by Contributing Area – (Page 146 – new text shown as underlined) (Page 153 of the 16/17 Policy)

	Water Supply		Wastewater	Stormwater	Reserve Improvements and Community Facilities		Reserve Land		Transportation		Transportation – Eastern Access Road
Category	**Dwelling Equivalents per 100m² GFA**	**Plus Network Factor Dwelling Equivalents**	**Dwelling Equivalents per 100m² GFA**	**Dwelling Equivalents per 100m² Impervious Surface Area**	**Dwelling Equivalents per 100m² GFA for Wakatipu**	**Dwelling Equivalents per 100m² GFA for Wanaka**	**Dwelling Equivalents per 100m² GFA for Wakatipu**	**Dwelling Equivalents per 100m² GFA for Wanaka**	**Dwelling Equivalents per 100m² GFA for Wakatipu**	**Dwelling Equivalents per 100m² GFA for Wanaka**	**Dwelling Equivalents per 100m² GFA**
Residential	1 Dwelling Equivalent (DE) per Dwelling Unit										
Residential Flat	0.37	0.40	0.62	0.38	0.62	0.62	0.62	0.62	0.62	0.62	
Multi-Unit Residential	0.37	0.40	0.62	0.38	0.62	0.62	0.62	0.62	0.62	0.62	
Accommodation	0.25	1.30	0.50	0.38	0.90	1.71	0.90	1.71	1.72	2.17	1.36
Commercial	0.16	1.17	0.20	0.38	0.04	0.06	0.00	0.00	2.15	2.56	2.99
Industrial	0.16	1.17	0.20	0.38	0.04	0.06	0.00	0.00	1.04	1.19	0.88
Country Dwelling	1 DE per Dwelling		1 DE per Dwelling	1 DE per Dwelling	1 DE per Dwelling		0.66 DE's per Dwelling		1.34 DE's per Dwelling	3.01 DE's per Dwelling	
Other	To be individually assessed at the time of application										
CBD Accom	0.25	1.30	0.50	0.38	0.90	1.71	0.90	1.71	1.72	2.17	
CBD Comm	0.16	1.17	0.20	0.38	0.04	0.06	0.00	0.00	2.15	2.56	
Mixed Use Accommodation	1 DE per Dwelling		1 DE per Dwelling	0.38	0.78	0.95	0.78	0.95	1.30	1.38	
Mixed Use Commercial	1 DE per Dwelling		1 DE per Dwelling	0.38	0.78	0.95	0.59	0.71	0.97	0.99	
Primary Industry	1 DE per Dwelling		1 DE per Dwelling	1 DE per Dwelling	1 DE per Dwelling		0.66 DE's per Dwelling		1.69 DE's per 27Ha	1.83 DE's per 41Ha	
Restaurant/Bar	0.83	1.17	0.46	0.38	0.04	0.06	0.00	0.00	2.15	2.56	
Unusual Developments	To be individually assessed at the time of application - refer to page 159 for definition										

Amendment 10 - When will payment be required?

The August 2014 Local Government Act amendments inserted S198 (4A) which allows territorial Authorities to withhold a certificate of acceptance under Section 99 of the Building Act. Accordingly, the following definition is proposed to be included in the Policy. This section is also updated to remove the reference to reassessment of unpaid development contributions (see amendment 2 above):

WHEN WILL PAYMENT BE REQUIRED? - (Page 152 – deleted text shown struck out, new text shown as underlined) (Page 160 of the 16/17 Policy)

Development contributions may be sought in respect of any development that generates a demand for reserves, network or community infrastructure. Council will assess whether development contributions are payable in relation to the development when an application for one of the following is made:

I. Resource Consent
II. Building Consent
III. Authorisation for a Service Connection

Any Development contributions assessed will be payable on granting of consent with a due date for payment as follows:

- Resource consent (subdivision) – prior to the issue of S224c certificate;
- Resource consent (other) – prior to commencement of the consent except where a building consent is required then payment shall be prior to the issue of the code of compliance certificate, certificate of acceptance or prior to the connection to Council services, whichever comes first.
- Building consent – prior to the issue of the code of compliance certificate, certificate of acceptance or prior to the connection to Council services, whichever comes first.
- Service connection – prior to connection.

~~If development contributions are not paid within 24 months of a consent being issued contributions will be recalculated under the latest version of the policy.~~

~~Effectively this means that any Development Contribution Notice (DCN) is valid for 24 months from the time of issue:~~

~~• All DCN's issued after 1 July 2012 will be valid for 24 months from the date of issue and then recalculated for payment under the policy relevant at that time.~~

If payment is not received the Council may (under section 208 of the LGA):

- Withhold S224c Certificate on a subdivision;
- Prevent the commencement of a resource consent for a development
- Withhold a code of compliance certificate under the Building Act
- Withhold a certificate of acceptance under the Building Act
- Withhold a service connection to a development.

In each case the Council may register the Development Contribution under the Statutory Land Charges Registration Act 1928 as a charge on the title of the land for which the contribution was required.

Amendment 11 - Credits

The current definition of credits requires simplifying to ensure the three types of credits are clearly understood, In addition, developers will be required to provide detailed information on credit history to enable more efficient processing of development contribution notices by Councils DC officers which will enable faster processing and an understanding of the credit history by the applicant. An inclusion of common exceptions to when credits might apply has also been added to provide extra clarity around what DC charges will be made. Accordingly, the following definition is proposed to be included in the Policy:

CREDITS **-** (Pages 153 – 155 - deleted text shown struck out, new text shown as underlined) (Page 161 - 163 of the 16/17 Policy)

CREDITS

~~There are three types of credits anticipated:~~

~~1. Historic Credits – 'Deemed'~~
~~2. Historic Credits – 'Cash'; and~~
~~3. Actual Credits~~

~~1. HISTORIC CREDITS - 'DEEMED'~~

~~In assessing Development Contributions the Council will determine if a site has a historic entitlement. Sites within existing contributing areas that have existed prior to financial contribution requirements and those that have already paid in full under Council policy at the time will be eligible.~~

~~Historic entitlement will be recognised and given a 'deemed´ credit based on the characteristics of the site immediately preceding the proposed development. Deemed credits will be identified on the 'Development Contribution Notice' and will be converted to 'dwelling equivalents units' for each type of service.~~

~~The following deemed credits are anticipated (not intended as an exclusive list):~~

- ~~For residential subdivisions (where the residual lot remains residential) the existing lot will be allocated a credit of one 'Dwelling Equivalent' and no Development Contribution will be payable on the residual lot.~~
- ~~Where a residential subdivision is developed (i.e. vacant lot built upon) one 'Dwelling Equivalent' credit will be allocated to each underlying lot.~~
- ~~Redevelopment of sites containing non-residential activities will be given historical credits based on 'Dwelling Equivalents' assessed in terms of the relevant 'unit' (i.e. GFA) prior to redevelopment.~~
- ~~Any excess historical credits that are identified as a result of an amalgamation of individual titles will accrue on the new amalgamated title but will lapse if not utilised within a period of three years.~~

~~2. HISTORIC CREDITS - CASH~~

~~On sites that have been subdivided and contributions paid, but which have not been developed prior to the new policy being implemented, developers may request an assessment of 'cash' credits for the site.~~

~~The Council will invite applicants to submit with their applications, records of the amount(s) paid at the time of the subdivision. The Council will then take into account the actual amounts paid for each service in determining the total development contributions payable for each service. In some instances, particularly industrial and commercial sites, the amount paid may exceed the amount required under the new policy. If there is a surplus this will be recorded on the 'Development Contribution Notice'. This cash credit may be used to off-set contributions that would otherwise be payable on future development and expansion of activities on the site. It should be noted that these credits will be specific to the service for which they were paid (i.e. not transferable between services, for example, a positive reserve contribution will not be able to off-set a water contribution). They will also be site specific (not transferable) and non refundable unless the refund provisions of the Act apply.~~

~~3. ACTUAL CREDITS - CREDITS ACCRUED UNDER THE NEW POLICY~~

~~The term 'actual' credit refers to credits accrued under the new policy. As indicated above, details of assessments made and payments received will be recorded on the 'Development Contribution Notice'. The balance of the 'Development Contribution Notice' may in some circumstances be positive.~~

~~The Council is able to assess the amount of contributions payable at successive stages of the development cycle (i.e. resource consent, building consent and service connection). Should the development contribution assessment be based on an estimate of the future building Gross Floor Area (GFA), which is likely to be the case at subdivision consent stage, then this assessment will be based on 75% of the maximum GFA allowed for on the site under the existing provisions of the District Plan. Council may review the percentage to be charged at this stage should the applicant satisfactorily demonstrate that the actual site utilisation will be significantly less than the estimate.~~

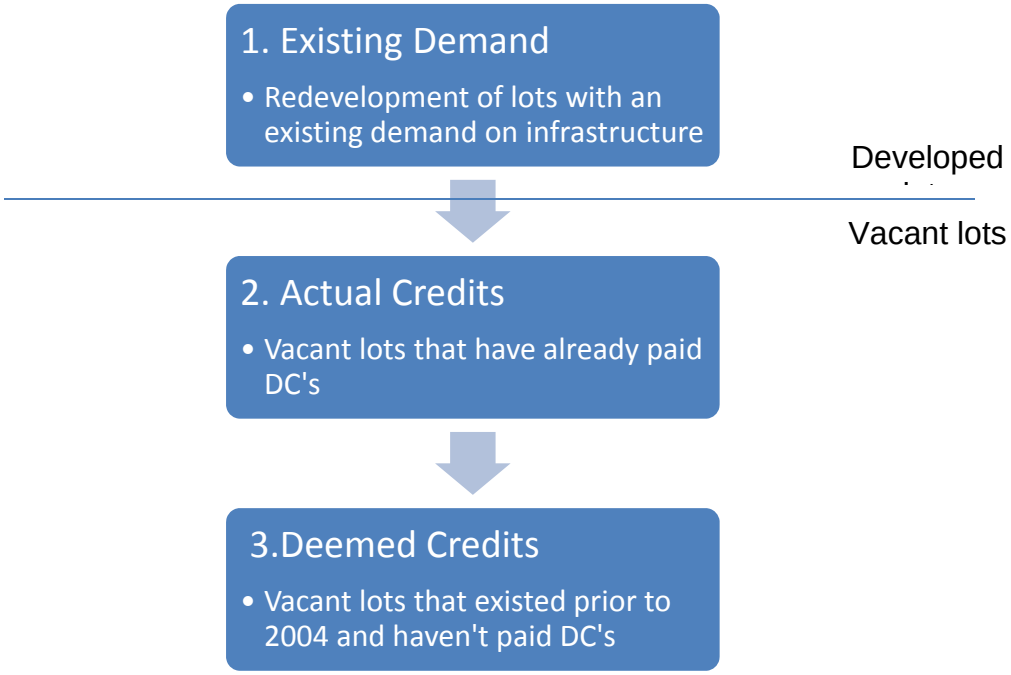
~~This may mean that additional contributions are assessed at the building consent stage. This approach will limit the amount of actual credits accumulated. There will be no time limit within which these credits must be use~~

Assessing Additional Demand - Existing Demand and Credits

The following existing demand and credit considerations apply to all development contribution assessments:

- The existing demand of any lot that is to be developed will be converted to a dwelling equivalent credit when assessing development contributions. Thus, development contributions are solely for additional demand created by the new development.
- Credits will be specific to the activity for which they were paid (i.e. a water supply credit will not be able to offset a wastewater contribution).
- Credits are to be site specific (not transferable) and non-refundable unless the refund provisions of the Act apply.

There are three types of development contribution credits that may be applied:



The applications of existing demand and credits are described in the following table.

Table of Credit types:

When do they apply?	Information to be provided by the developer	The following situations are anticipated		Exceptions	Comments
		Type of Development	Details		
Existing Demand					
Redevelopment of lots with an existing demand on infrastructure where a development contribution **has** never been paid.	The existing use of the site prior to redevelopment expressed in the appropriate unit of demand (e.g. Gross Floor Area (GFA), Impermeable Surface Area (ISA), number of residential units etc.) Should the developer be unable to provide confirmation of credits, no credits will be allocated.	Redevelopment	The existing demand will be quantified in dwelling equivalents using the current development contributions policy.	Lots that have a consent notice registered on the certificate of title stating that the lot has not been serviced by Councils water, wastewater or stormwater. In these instances no credits will be given unless the developer is able to provide otherwise.	Only the current (existing) demand will be assessed and not any historic use of the site.
Actual Credit					
Development of lots when development contributions have already been paid. This will apply to all lots created after 1 July 2004.	Records of development contributions paid. Should the developer be unable to provide confirmation of credits, no credits will be allocated.	All lots.	The actual credit will be quantified in dwelling equivalents for each activity based on the policy under which the payment was made.	Lots that have a consent notice registered on the certificate of title stating that the lot has not been serviced by Councils water, wastewater or stormwater. In these instances no credits will be given unless the developer is able to provide otherwise.	Any surplus credits will remain on the land for future development.

When do they apply?	Information to be provided by the developer	The following situations are anticipated		Exceptions	Comments
		Type of Development	Details		
Deemed Credit					
Deemed credit to apply to vacant lots that existed prior to the requirement for development contributions (2004) and has not paid development contributions.	Developer to provide the certificate of title for the lot(s) to prove that the lot has existed prior to 2004.	Residential	One dwelling equivalent per lot.	• Lots that have a consent notice registered on the certificate of title stating that the lot has not been serviced by Councils water, wastewater or stormwater. In these instances no credits will be given unless the developer is able to provide otherwise. • Any excess historical credits that are identified as a result of an amalgamation of individual titles will accrue on the new amalgamated title but will lapse if not utilised within a period of three years • Some areas may not be due a full dwelling equivalent credit as pre 2004 Council owned water and wastewater infrastructure was not available to all sites. The general exceptions are: • Vacant lots in Lake Hayes (water supply & wastewater) were not required to pay a capital contribution when the schemes were introduced. As such full DC's are payable at the time of development. • Glenorchy: A small number of property owners paid a lump sum contribution towards the Glenorchy water scheme. All other property owners are required to pay for new water connections. Please contact	A deemed credit will only apply when an actual credit does not exist.
		Rural sites	For Rural general sites, one dwelling equivalent per registered building platform. For all other rural sites one dwelling equivalent will apply for reserves and roading. Owner to provide evidence that water and wastewater should also receive a credit		
		Commercial / Industrial	50m² gross floor area and impervious site area for lots <= 500m². 100m² gross floor area and impervious site area for lots > 500m² <= 2,000m². 400m² gross floor area and impervious site area for lots >2,000m².		

When do they apply?	Information to be provided by the developer	The following situations are anticipated		Exceptions	Comments
		Type of Development	Details		
				the DCN officer at QLDC to determine whether your property paid. • Luggate: - Luggate Lots created pre July 2004: no credits for water or wastewater as vacant sites were not required to pay a capital contribution when the schemes were introduced - Luggate Lots created between July 2004 and July 2014: no credits for wastewater (credit for water however) - Luggate Lots created post July 2014: all credits should apply • Aubrey Road, Studholme Road, and Tucker Beach Road: Council owned water reticulation has been progressively extended. These sites may not have a credit for water or wastewater. Applicant to provide evidence of connection and payment	

Myles Lind

[redacted]

Please select the statement that applies to you:

I DO NOT wish to be heard in support of my feedback at a public hearing

Would you like to include your name as part of this feedback?

I understand

Please explain your decision above

This is a great step for for the district and progress to best balance user pays with community pays. In particular I support the provision on removing the ability to recalculate development contributions after 24 months.

Warwick Goldsmith

Jacks Point Residents and Owners Association

[redacted]

Please select the statement that applies to you:

I DO wish to be heard in support of my feedback at a public hearing

Would you like to include your name as part of this feedback?

I understand

Please explain your decision above

Please see attached submission

Memorandum

Date	28 April 2017
Matter no.	16006698
To	Queenstown Lakes District Council
From	Anderson Lloyd (on behalf of Jacks Point Residents and Owners Association)
Subject	Submission to the Annual Plan 2017 – Development Levies – Jacks Point

1. This Submission is lodged on behalf of Jacks Point Residents and Owners Association Incorporated (**JPROA**). The Submission relates only to that part of the Jacks Point Resort Zone (**JPRZ**) which is subject to the jurisdiction of the JPROA because it relates to, and relies upon, specific historic circumstances only applicable to that land.

2. When the original JPRZ was created, the developer Jacks Point Limited (**JPL**) entered into a deed with Queenstown Lakes District Council dated 31 May 2006 (**DC Deed**) relating to the payment of Development Contributions (**DC's**). The DC Deed was a consequence of the fact that JPL would be responsible for building communal infrastructure and for putting in place an ongoing regime to maintain that infrastructure. That in turn resulted in the creation of the JPROA. The DC Deed required JPL to construct significant communal infrastructure and provided for ongoing credits to be offset against DC's up to the value of the original expenditure incurred by JPL.

3. Subsequent changes to Council policies in relation to collection of DC's for Land for Reserves have resulted in an ambiguous situation relating to these outstanding credits which in turn has resulted in some illogical and conflicting outcomes arising from the definition of 'Greenfield' and 'Brownfield' development in the Council's policies relating to DC's. Those definitions are proposed to be amended again in a manner which will add to that confusion.

4. The question of whether DC's for Land for Reserves will be payable in a particular case will be determined on a '…*case by case basis'* on whether there is '…*existing accessible reserve land within 800m of the site, and whether the reserve is of an appropriate size and purpose…'* That formula will be difficult to administer consistently within the JPRZ in existing developed areas where reserves have not been developed with that policy in mind.

5. JPROA proposes a different approach, to address these specific circumstances, applicable only to land within the jurisdiction of the JPROA. The Constitution of the JPROA contains the following definition of 'Developed Property':

"*'**Developed Property**' means, subject to clause 8.2, a property within Jacks Point:*

a) for which a separate title (including, without limitation, a unit title or certificate of title for an estate in fee simple) has issued; and

b) which either:

i. is a bare lot available for immediate development as:
1. a residential property;
2. a commercial property (including commercial accommodation); or
3. any other use permitted within Jacks Point;
including, in each case, a lot on which development / construction has commenced; or

ii. has been fully developed as:

1. *a residential property;*
2. *a commercial property (including commercial accommodation); or*
3. *any other use permitted within Jacks Point; but*

c) *does not include:*

i. *a Golf Course property unless all of the registered proprietors of the Golf Course, including the Golf Course Operator, notify the Society that such a property is for the purposes of this definition to be a Developed Property;*

ii. *any lot that is capable of further subdivision and that is not in any way restricted by a Non-Subdivision Covenant, unless the then registered proprietor of the lot, Golf Course Operator and the Society have entered into a Property Deed. From the date provided in the Property Deed, the lot and any property contained in a separate title resulting from a subdivision of the lot (including, without limitation, a unit title or a certificate of title for an estate in fee simple but excluding any land owned by the Society or the Infrastructure Association as a Communal Facility) will be a Developed Property for the purposes of this definition."*

6 JPROA requests an exception to the proposed policy relating to DC's worded as follows (or along similar lines):

"*…provided that, within land subject to the jurisdiction of the Jacks Point Residents and Owners Association Incorporated (JPROA):*

(a) *land which is a 'Developed Property' as defined in the Constitution of the JPROA shall be Brownfield land;*

(b) *land which is not a 'Developed Property' as defined in the Constitution of the JPROA will be Greenfield land."*

7 JPROA believes that the exception detailed above will create a regime which is easy to administer, will resolve the ambiguities created by the proposed policy, and will properly reflect the original intentions of the DC Deed.

Warwick Goldsmith

Counsel for Coneburn Residential Holdings Limited

Warwick Goldsmith

Coneburn Residential Holdings Limited

[redacted]

Please select the statement that applies to you:

I DO wish to be heard in support of my feedback at a public hearing

Would you like to include your name as part of this feedback?

I understand

Please explain your decision above

Please see attached submission

Memorandum

Date	28 April 2017
Matter no.	16006698
To	Queenstown Lakes District Council
From	Anderson Lloyd (on behalf of Coneburn Residential Holdings Limited)
Subject	Submission to the Annual Plan 2017 – Development Levies – Jacks Point

1. This Submission is lodged on behalf of Coneburn Residential Holdings Limited (**CRHL**). The Submission relates only to that part of the Jacks Point Resort Zone (**JPRZ**) which is subject to the jurisdiction of the Jacks Point Residents and Owner's Association Incorporated (**JPROA**) because it relates to, and relies upon, specific historic circumstances only applicable to that land.

2. When the original JPRZ was created, the developer Jacks Point Limited (**JPL**) entered into a deed with Queenstown Lakes District Council dated 31 May 2006 (**DC Deed**) relating to the payment of Development Contributions (**DC's**). The DC Deed was a consequence of the fact that JPL would be responsible for building communal infrastructure and for putting in place an ongoing regime to maintain that infrastructure. That in turn resulted in the creation of the JPROA. The DC Deed required JPL to construct significant communal infrastructure and provided for ongoing credits to be offset against DC's up to the value of the original expenditure incurred by JPL.

3. Subsequent changes to Council policies in relation to collection of DC's for Land for Reserves have resulted in an ambiguous situation relating to these outstanding credits which in turn has resulted in some illogical and conflicting outcomes arising from the definition of 'Greenfield' and 'Brownfield' development in the Council's policies relating to DC's. Those definitions are proposed to be amended again in a manner which will add to that confusion.

4. The question of whether DC's for Land for Reserves will be payable in a particular case will be determined on a '*…case by case basis'* on whether there is '*…existing accessible reserve land within 800m of the site, and whether the reserve is of an appropriate size and purpose…'* That formula will be difficult to administer consistently within the JPRZ in existing developed areas where reserves have not been developed with that policy in mind.

5. CRHL proposes a different approach, to address these specific circumstances, applicable only to land within the jurisdiction of the JPROA. The Constitution of the JPROA contains the following definition of 'Developed Property':

   "'***Developed Property***' *means, subject to clause 8.2, a property within Jacks Point:*

   a) for which a separate title (including, without limitation, a unit title or certificate of title for an estate in fee simple) has issued; and

   b) which either:

   i. is a bare lot available for immediate development as:
   1. a residential property;
   2. a commercial property (including commercial accommodation); or
   3. any other use permitted within Jacks Point;
   including, in each case, a lot on which development / construction has commenced; or

ii. has been fully developed as:

1. a residential property;

2. a commercial property (including commercial accommodation); or

3. any other use permitted within Jacks Point; but

c) does not include:

i. a Golf Course property unless all of the registered proprietors of the Golf Course, including the Golf Course Operator, notify the Society that such a property is for the purposes of this definition to be a Developed Property;

ii. any lot that is capable of further subdivision and that is not in any way restricted by a Non-Subdivision Covenant, unless the then registered proprietor of the lot, Golf Course Operator and the Society have entered into a Property Deed. From the date provided in the Property Deed, the lot and any property contained in a separate title resulting from a subdivision of the lot (including, without limitation, a unit title or a certificate of title for an estate in fee simple but excluding any land owned by the Society or the Infrastructure Association as a Communal Facility) will be a Developed Property for the purposes of this definition."

6 CRHL requests an exception to the proposed policy relating to DC's worded as follows (or along similar lines):

"*…provided that, within land subject to the jurisdiction of the Jacks Point Residents and Owners Association Incorporated (JPROA):*

(a) land which is a 'Developed Property' as defined in the Constitution of the JPROA shall be Brownfield land;

(b) land which is not a 'Developed Property' as defined in the Constitution of the JPROA will be Greenfield land."

7 CRHL believes that the exception detailed above will create a regime which is easy to administer, will resolve the ambiguities created by the proposed policy, and will properly reflect the original intentions of the DC Deed.

Warwick Goldsmith

Counsel for Coneburn Residential Holdings Limited

the propertygroup
Corporate Property Advisors and Negotiators®

The Property Group Limited
[redacted]

27 April 2017

Queenstown Lakes District Council

Attention: Mike Theelen, CEO

Dear Sir,

SUBMISSION ON THE QUEENSTOWN LAKES DISTRICT COUNCIL DRAFT ANNUAL PLAN 2017-2018

Riverton Queenstown Ltd (Riverton) seek amendments to the Draft Annual Plan 2017-2018. With regard to the Development Contributions policy pertaining to multi-unit developments, the current statement in the policy is:

MULTI UNIT RESIDENTIAL DEVELOPMENTS This relates to any development that involves the development of three or more residential units within a single site, it does not include additions, alterations or accessory buildings. When assessing the number of dwelling equivalents for multi unit developments, instead of allowing one dwelling equivalent per unit, the assessment will be done using the GFA of the development and the multi unit residential differentials shown in the above table. This method more clearly defines the impact of multi unit residential developments when compared to visitor accommodation and will make most developments of this type more affordable.

The draft Annual Plan proposes an amendment, whereby the reference to *'three or more residential units within a single site'*, is amended to '*three or more residential units/apartments within a single site'.*

We consider that this clarifies that the policy should be applied to attached multi-unit dwellings, rather than just to apartments – noting that recent discussions between Riverton and Council officers, with regard to the Arthurs Point Bullendale development, has been that Council officers interpret the multi-unit policy as only applying to the apartments in the development.

In Riverton's view, this is the wrong interpretation, and the proposed amendments confirm that view. If Council's intent was only to apply the multi-unit policy to apartments, then Council would be proposing to amend the policy so that the term 'residential units' is deleted, and replaced by the term 'apartments.'

Therefore, in part, Riverton generally supports the amendments as proposed.

However, Riverton considers that further additions to the policy are required to aid with clarity in interpretation.

In particular, another related point of disagreement with Council officers has been around the phrase:

'This relates to any development that involves the development of three or more residential units within a single site'.

In relation to Riverton's Arthurs Point development, Council officers have advised that as each of the attached townhouses in the development will ultimately be on their own freehold title, that the multi-unit policy does not apply as there will only be one residential unit per site (in terms of the ultimate outcome of one dwelling per freehold title). Riverton considers that this interpretation is not in the spirit of the policy, nor in its original intent, which Riverton considers to have two key facets:

- On average, smaller multi-unit dwellings have smaller building coverages, and lower occupancies, which all things being equal on an averaged basis generates less impact per dwelling on Council's infrastructure: therefore, it is both logical, and just, to charge lower development contributions per dwelling.

- Lower development contributions on multi-unit development assists with the overall feasibility, and ultimate affordability of multi-unit development, which Council seeks to enable in urban locations.

Riverton considers that the statement *'This relates to any development that involves the development of three or more residential units within a single site'* should be read as relating to the development as a whole, as consented, on the site subject to the resource consent approval.

We note that other Councils in New Zealand provide greater clarity around their multi-unit development contributions policy. For example, Auckland Council provides multi-unit 'discounts' for *attached* dwellings, which includes attached townhouses / terrace housing, as well as apartment units. To further clarify, Auckland Council's policy clearly outlines that multi-unit 'discounts' will not apply to detached dwellings, even if they are small detached townhouses on small sections.

Riverton submits that greater clarity can be provided in QLDC's policy if the following amendments are made (deletions struck through, additions underlined):

MULTI UNIT RESIDENTIAL DEVELOPMENTS This relates to any development that involves the development of three or more attached residential units or apartments ~~within a single site~~, it does not include additions, alterations or accessory buildings. When assessing the number of dwelling

equivalents for multi unit developments, instead of allowing one dwelling equivalent per unit, the assessment will be done using the GFA of the development and the multi unit residential differentials shown in the above table. This method more clearly defines the impact of multi unit residential developments when compared to visitor accommodation and will make most developments of this type more affordable.

These amendments remove the ambiguity of the reference '*within a single site',* making it clear that the multi-unit policy applies to any development - whatever it's ultimate form in terms of land titling – where the dwellings are attached or apartments.

Council can be assured that these changes will not result in unintended negative consequences, for example large (160 square metre-plus gross floor area) *attached* dwellings gaining substantial discounts. This is due to the fact that the quantum of the multi-unit 'discount' is ultimately determined by the floor area of each dwelling. As an example, this would mean that a 10 unit attached townhouse development comprising 3 bedroom townhouses each of 150 square metres would obtain minimal discount, whilst a 10 unit attached townhouse development comprising 2 bedroom townhouses each of 70 square metres would obtain a significant discount.

Finally, we consider that if Council is serious about meaningfully addressing the housing affordability issue in the district, then it requires a range of tools which collectively make a difference – as there is no one 'silver bullet'. The application of the multi-unit policy across the whole of the Bullendale development – as better enabled by our requested amendments - would collectively represent a significant cost saving, which at the *very least* provides valuable contingency against factors such as escalation in building material costs, which have the potential to tip projects -and therefore housing delivery - over.

Conclusion

Thank you for your consideration of our submission. We would appreciate the opportunity of presenting our submission to Council.

Yours sincerely,

MATTHEW PAETZ (on behalf of Riverton Queenstown Limited)
Auckland Planning Manager

DDI [redacted]
Email [redacted]