

**SUBMISSION ON VARIATION 2: FINANCIAL CONTRIBUTIONS TO THE PROPOSED
WAIMAKARIRI DISTRICT PLAN**

To: Submission Variation 2: Financial Contributions
Waimakariri District Council
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By email: developmentplanning@wmk.govt.nz

Submission by: Bellgrove Rangiora Ltd

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1. This is a submission by Bellgrove Rangiora Ltd (**BRL**) on Variation 2: Financial Contributions (**Variation 2**) to the Proposed Waimakariri District Plan (**PWDP**).
2. BRL could not gain an advantage in trade competition through this submission.
3. This submission relates to Variation 2 in its entirety, and particularly in relation to impacts from Variation 2 on the following properties in eastern Rangiora which BRL own or have an interest in:
 - a) Part RS 267 and Lot 2 DP 24808 (52 Kippenberger Avenue), and Part Lot 2 DP 9976 held within Record of Title CB8B/1429; Lot 1 DP 22674 (76 Kippenberger Avenue) held within Record of Title CB3C/987; a portion of Lot 1 DP 79128 (the access leg of 78 Kippenberger Avenue) held within Record of Title CB45B/1204; and a portion of Lot 1 DP 24808 (73 Golf Links Road) held within Record of title CB8B/1426; (collectively referred to herein as **Bellgrove North**); and
 - b) Lot 2 394668 and Lot 2 DP 452196 held within Record of Title 577722, Lot 2 DP 12090 held within Record of Title CB474/29, and Lot 4 DP 25508 held within Record of Title CB7A/1261; (collectively referred to herein as **Bellgrove South**).

Refer to the attached image appended at **Attachment A** showing the locations of BRL's landholdings as described above.

Background

4. BRL is a joint venture between Westpark Rangiora Ltd, MGNC Developments Ltd and Bellgrove Investments Ltd. They are owners of a total land holding area of approximately 100 ha and have plans to develop this area as a residential development known as 'Bellgrove'. BRL recognise the housing crisis New Zealand faces and the critical role local developers play in providing an adequate supply, typology, and affordability in the housing stock at the local level. Details of the joint venture partners are contained in the original BRL submission on the PWDP.
5. BRL submitted on the PWDP in 2021:
 - a) **Submission 1**: relates to the PWDP as a whole, with a specific focus on the provisions for the New Development Areas: North East Rangiora Development Area (NER) and South East Rangiora Development Area (SER); the subdivision (SUB) provisions including those related to natural hazards (SUB R3 and SUB R4), historic heritage (HH052), residential density and esplanade reserves; residential provisions (RESZ) namely the General Residential and Medium Density Residential Zone; the Commercial and Mixed-Use Zone provisions namely Local Centre Zone (LCZ); and other provisions including Historic Heritage (HH), Transport (TRAN), Noise (NOISE), Signs (SIGN) and Designations. The submission expresses:
 - i. broad support for the identification of the NER Development Area (relevant to Bellgrove North) and the SER Development Area (relevant to Bellgrove South) and provisions that enable the transition from the underlying proposed Rural Lifestyle Zone to residential development, subject to a prescribed certification process;
 - ii. general support for the provisions that are supportive of enabling residential growth;
 - iii. the need for additional flexibility and provision for residential development within the PWDP through the adoption of provisions that will deliver sufficient, feasible, certain, plan-enabled land development capacity for residential use; and
 - iv. changes to the notified NER and SER Outline Development Plans to reflect the proposed subdivision layout and additional work undertaken by BRL following input into the draft structure plan process.
 - b) **Submission 2**: seeking the BRL land be zoned for residential purposes rather than subject to the proposed certification process.
6. In addition, BRL has lodged a submission on Variation 1 (Housing Intensification) to the PWDP. This submission on Variation 2 should be read in the context of these other submissions.

Submission

7. Variation 2 to the PWDP proposes to introduce Financial Contributions for services that do not form part of the existing Waimakariri District Council (WDC) Development Contributions Policy, but are needed to enable future development to occur or mitigate

environmental effects once all other alternative options have been exhausted. Variation 2 is WDC's response to Section 77E (1) of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021' (**the EHS Act**) which enables councils to collect financial contributions to fund infrastructure upgrades and mitigate any adverse effects on the environment that can be attributed to housing intensification.

8. Variation 2 introduces financial contribution provisions in respect of the development of new residential units within the Medium Density Residential Zone, specifically more than two residential units per site and the creation of more than two new allotments. Standards within the chapter also provide assessment methodologies for calculating financial contributions required. Given Variation 1 proposes to rezone Bellgrove North to Medium Density Residential Zone (MRZ); and enable land in Bellgrove South to assume MRZ zoning following the certification process set out in the PWDP, these requirements have the potential to impact BRL.
9. Variation 2 fails to provide certainty to an applicant as to the methodology WDC will use to calculate financial contributions and, as a consequence, the likely quantum of the same. In the absence of such certainty, BRL is concerned for the potential to duplicate Development Contribution requirements under the Local Government Act 2002 (LGA). The nature and quantum of financial contributions is crucial to undertaking a feasibility assessment of a development.
10. Section 108(10) RMA provides that:
A consent authority must not include a condition in a resource consent requiring a financial contribution unless—
 - a. *the condition is imposed in accordance with the purposes specified in the plan [[or proposed plan]] (including the purpose of ensuring positive effects on the environment to offset any adverse effect); and*
 - b. *the level of contribution is determined in the manner described in the plan [[or proposed plan]].]*
11. In this regard, Variation 2 must clearly state the purpose of financial contributions and describe the methodology regarding how financial contributions are to be determined.
12. Whilst relatively general in its description, Variation 2 could be said to meet the requirement of s108(10)(a). It is noted, however, that financial contributions do not need to provide for full recovery to pay for services in relation to the activity for which a resource consent (or permitted activity) is required. They are a contribution paid by the developer to partly mitigate or compensate for impacts of the development that are not met by Development Contributions or other measures. The term "offset", as used in the introduction under "FC - Koha pūtea - Financial Contributions" implies full compensation or complete balance of costs and would be more appropriately replaced with "mitigate" or "contribute towards".

13. In respect of s108(10)(b), Variation 2 must in some way – either ‘broadly descriptive or narrowly prescriptive’¹ – specify the method in which a financial contribution can be determined. Variation 2 does not satisfy this requirement. If financial contributions are to be used to mitigate the effects of housing intensification, the method of determining the level of contributions must be clearly articulated. FC-S1: Assessment Methodology fails in this regard.
14. In addition, financial contributions need to be fair, reasonable and consistent. Whilst Objective FC-O1 (Infrastructure Impacts) refers to ‘equitably’ this is not the same as fair and consistent, and Objective FC-O2 (Environmental Effects) makes no mention of ‘equitably’ or any other reference to fairness or reasonableness.
15. As drafted, Variation 2 does not provide sufficient certainty that there will be no duplication of contributions (i.e., that contributions will not be taken twice for the same development), noting that s.198 of the Local Government Act 2002 (LGA) provides WDC with powers to levy development contributions. Development Contributions may be required when:
 - i. *A resource consent is granted under the Resource Management Act 1991 (RMA) for a development within its district;*
 - ii. *A building consent is granted under the Building Act 2004 for building work situated in its district (whether by the territorial authority or a building consent authority);*
 - iii. *An authorisation for a service connection is granted*
16. Variation 2 is not explicitly clear that financial contributions will only be required when the existing Development Contributions Policy does not already require contributions for infrastructure required to support a development.
17. Variation 2 lacks transparency and certainty in respect of the process for how financial contributions will be calculated and does not allow a reader of the plan to clearly ascertain what is required of them, whilst being assured that everyone is treated alike. This contrasts with the Development Contributions Policy, in which contributions are calculated based on a standardised unit (Household Unit Equivalent (HUE)), enabling the contributions to be clearly interpreted by others. In addition, the assessment process would enable the Council to change the nature of how inputs such as inflation, infrastructure base cost assumptions etc., are calculated without involvement or input from the wider developer community.
18. In addition, Variation 2 insufficiently details public involvement and commentary to the financial contributions assessment process. The notified financial contribution process set out by Variation 2 would not enable or provide for any public involvement. The only process available to a developer seeking a recalculation or reconsideration of the financial contributions calculated would be via the Right of Objection Process outlined in s.357 of the RMA. This contrasts with the Development Contributions, where the public have an opportunity to submit on draft development contributions policy and there is a transparent process for the review of the policy at regular intervals.

¹ South Port New Zealand v Southland RC EnvC C091/02, para 23-28

19. Variation 2 should include policy provision that outlines a methodology for determining a maximum financial contribution required (i.e., up to X% of the actual or estimated costs). This should also outline that a lesser amount can be imposed at the discretion of the Council where charging the maximum would be unfair and unreasonable.
20. A series of amendments sought in relation to the notified provisions as detailed in Attachment 2.

Summary

21. BRL oppose Variation 2 in its current form given it fails to provide certainty and transparency to developers.

Relief sought

22. BRL seek the following decision:
 - (a) That Variation 2 be rejected in its current form; or
 - (b) That the provisions be amended to reflect the issues raised in this submission; and/or
 - (c) Such other relief as may be required to give effect to this submission, including alternative, consequential or necessary amendments to Variation 2 that address the matters raised by BRL.
23. BRL wishes to be heard in support of this submission.

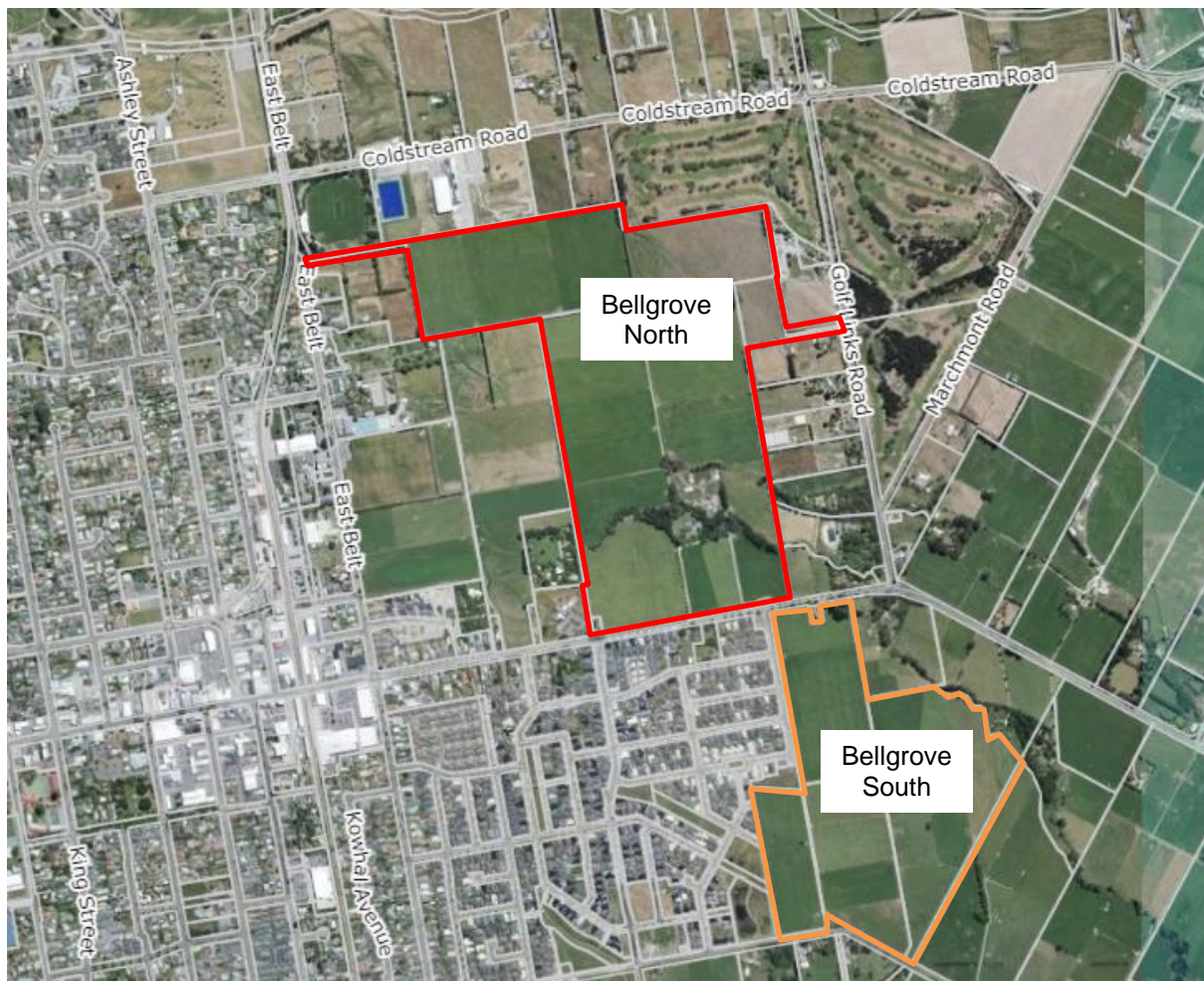
Date: 9 September 2022



M Allan

on behalf of Bellgrove Rangiora Ltd

Attachment 1: BRL Property Location Plan



Address	Legal Description	Record of Title	Area (ha)
Bellgrove North			
52 Kippenberger Avenue	Part RS 267	CB8B/1429	40.59
	Lot 2 DP 24808		1.86
N/A	Part Lot 2 DP 9976		20.46
76 Kippenberger Avenue	Lot 1 DP 22674	CB3C/987	0.10
78 Kippenberger Avenue	Lot 1 DP 79128	CB45B/1204	0.0789*
73 Golf Links Road	Lot 1 DP 24808	CB8B/1426	0.1764**
<i>Total Bellgrove North Area</i>			63.27
Bellgrove South			
N/A	Lot 2 DP 394668	577722	8.79
N/A	Lot 2 DP 452196		14.21
N/A	Lot 2 DP 12090	CB474/29	8.20
100 Northbrook Road	Lot 4 DP 25508	CB7A/1261	4.59
<i>Total Bellgrove South Area</i>			35.79
Total BRL Landholding			99.06

**BRL have purchased approximately 789 m² of Lot 1 DP 79128 (total site area of 2.53 ha) being the accessway for the lot which facilitates the construction of the Road 1 / Kippenberger Avenue / MacPhail Avenue Roundabout. A Caveat by BRL (Ref 12342731.1) is listed on the Record of Title (CB45B/1204) giving effect to this.*

***BRL will enter an agreement with the Rangiora Golf Club to acquire a 12m wide land strip (0.1764 ha of the total 3.26 ha site) to enable the East–West Collector Road to be 22m in width (the existing BRL-owned access corridor is only 10m) linking Stage 2 & 3 land to Golf Links Road. This will require a realignment and alteration to the existing Golf Course boundary, the exact area of which is to be determined.*

Attachment 2: Submission Table

The following submission table outlines the Variation 2 provisions to which the submission point relates, provides comment on the reasoning for the submission and outlines the relief sought. Provisions are submitted on in the order that they appear in Variation 2.

Provisions	Notified Provision	Comment	Relief Sought
FC - Koha pūtea - Financial Contributions			
Introductory Text	<p>Section 108 of the Resource Management Act 1991 empowers a Council to impose financial contributions on resource consents in accordance with the purposes specified in a plan and at a level determined in a manner described by the plan.</p> <p>Council is proposing to work through a review process to determine whether financial contributions will be required going forward. As part of this process Council will consult with key stakeholders and community, review funding options and look at amending this chapter at a later date as part of a variation to the District Plan.</p> <p>Financial contributions are collected by councils to address adverse effects of development that cannot be otherwise avoided, remedied or mitigated. Financial contributions can be used to cover the proportioned cost of the provision of infrastructure,</p>	<p>Support in Part</p> <p>The introductory text refers to financial contributions only being required where the adverse effects of subdivision and development on infrastructure are not otherwise addressed by Council's Development Contribution Policy under the Local Government Act 2002. This consideration of existing development contributions needs to be further emphasised and clarified throughout this chapter.</p> <p>Financial contributions are not required to provide for the full recovery of services in relation to the activity for which a resource consent (or permitted activity) is required. Instead, they are a contribution paid by the developer to partly mitigate or compensate for impacts of the development that are not met by Development Contributions or other measures. The term "offset" as used in Variation 2 implies full</p>	<p>Ensure that reference to the Development Contributions Policy is clear throughout the chapter to assist with reducing any potential duplication of contributions.</p> <p>Replace all references to 'offset' or 'offsetting' in this chapter with 'mitigate' or 'contribute towards'.</p>

	<p><i>such as upgrading or replacement of infrastructure to service higher capacity; and/or to offset adverse effects on the environment.</i></p> <p><i>Financial contributions may be imposed for the purpose of promoting the sustainable management of natural and physical resources. Section 77E of the RMA enables a council to require a financial contribution for any class of activity other than prohibited.</i></p> <p><i>The general circumstances where financial contributions may be required include:</i></p> <ul style="list-style-type: none"> <i>• to address the statutory exemption of the Crown from the provisions of the Local Government Act 2002 by taking financial contributions for subdivision and/or development by the Crown;</i> <i>• To enable the ongoing collection of, and potential review, of existing consent conditions that require a financial contribution;</i> <i>• To take financial contributions for reserves, other than esplanade reserves;</i> <i>• To offset the adverse effects of subdivision and development</i> 	<p>compensation or complete balance of costs.</p>	
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	<p><i>on infrastructure not otherwise addressed by Council's Development Contribution Policy under the Local Government Act 2002; and</i></p> <ul style="list-style-type: none"> <i>• To offset any adverse effects on the environment from intensive development and new subdivisions.</i> <p><i>In section 108(9) of the RMA, financial contributions mean a contribution of:</i></p> <ul style="list-style-type: none"> <i>• money; or</i> <i>• land, including an esplanade reserve or esplanade strip (other than in relation to a subdivision consent), but excluding Maori land within the meaning of Te Ture Whenua Maori Act 1993 unless that Act provides otherwise; or</i> <i>• a combination of money and land.</i> <p><i>The provisions in this chapter are consistent with the matters in Part 2 – District Wide Matters - Strategic Directions and give effect to matters in Part 2 – District Wide Matters - Urban Form and Development.</i></p>		
Objective FC-01 Infrastructure Impacts	<p><i>Residential intensification, new subdivision, and development equitably contribute towards remedying or mitigating effects on Council infrastructure.</i></p>	<p>Oppose Any provision made under s.108 of the RMA is required to be fair, reasonable and consistent. The term</p>	<p>Amend wording to clarify that any contribution required to mitigate effects on Council infrastructure must be fair, reasonable and consistent.</p>

		'equitably' is not the same as 'fair and consistent'.	
Objective FC-02 Environmental Effects	<i>Residential intensification, new subdivision, and development contribute towards mitigating their impact on the environment.</i>	Oppose Any provision made under s.108 of the RMA is required to be fair, reasonable and consistent. Objective FC-02 (Environmental Effects) contains no reference to fairness or reasonableness.	Amend wording to clarify that any contribution required to mitigate impacts on the environment must be fair, reasonable and consistent.
Policy FC-P1 Provision of Infrastructure	<i>Financial contributions are required where housing intensification, subdivision, and development or both have an adverse environmental effect on existing infrastructure, which requires capacity increases, upgrades or other modification to the infrastructure ahead of the scheduled maintenance/replacement program, or outside the scope of scheduled maintenance/replacement programme.</i>	Oppose Policy FC-P1 should be clear that financial contributions are required only where there is an adverse environmental effect on existing infrastructure, which requires capacity increases, upgrades or other modification to the infrastructure ahead of the scheduled maintenance/replacement program, or outside the scope of scheduled maintenance/replacement programme that is not already captured by the Development Contribution Policy. This is to ensure that duplication of financial contributions does not result.	Amend wording to: <u>Except where already provided for by the current WDC Development Contributions Policy</u> , financial contributions are required where housing intensification, subdivision, and development or both have an adverse environmental effect on existing infrastructure, which requires capacity increases, upgrades or other modification to the infrastructure ahead of the scheduled maintenance/replacement program, or outside the scope of scheduled maintenance/replacement programme
Activity Rule FC-R1 Medium Density Residential Zone New Residential Units	<i>New Residential Units are permitted where:</i> <i>1. there are more than two residential units per site;</i> <i>2. a financial contributions assessment has been</i>	Oppose The proposed approach does not provide a developer with an ability to estimate the contribution they would be required to pay. It is reliant on WDC to undertake a 'financial contributions assessment'.	Remove or revise Activity Rule FC-R1 to: 1. clearly articulate when any calculated financial contribution must be paid by; and 2. provide greater certainty on the process for obtaining a financial contributions assessment and how

	<p><i>completed in accordance with FC-S1; and</i></p> <p>3. <i>all monies calculated under FC-S2 to FC-S4 are paid.</i></p> <p><i>Discretionary where not achieved</i></p>	<p>The process (how to request, how long an assessment would take to be received, process to question the assessment) and timing (assume for a permitted activity under the plan this would be required prior to building consent) for how to undertake a financial contributions assessment is also unclear. For example, the operative WDP outlines in Rule 34.1.5 that it must be specified in a condition of resource consent when a payment is to be made (noting that for a land use consent this is prior to the consent being given effect).</p>	<p>this will be undertaken in a fair and reasonable way.</p>
<p>Activity Rule FC-R2</p> <p>Subdivision</p> <p>All Zones</p>	<p><i>Subdivision is permitted where:</i></p> <p>1. <i>more than two new allotments are created;</i></p> <p>2. <i>a financial contributions assessment has been completed in accordance with FC-S1; and</i></p> <p>3. <i>all monies calculated under FC-S2 to FC-S4 are paid.</i></p> <p><i>Discretionary where not achieved</i></p>	<p>Oppose</p> <p>The process (how to request, how long an assessment would take to be received, process to question the assessment) and timing (assume for a permitted activity under the plan this would be required prior to building consent) for how to undertake a financial contributions assessment is unclear.</p> <p>Under Variation 1, subdivision of a site within the medium density residential zone would require consent for a controlled activity where it meets the applicable subdivision standards. However, Activity Rule FC-R2 implies that if financial contributions have not been calculated prior to seeking consent (or</p>	<p>Remove or revise Activity Rule FC-R2 to:</p> <p>1. clearly articulate when any calculated financial contribution must be paid by; and</p> <p>2. provide greater certainty on the process for obtaining a financial contributions assessment and how this will be undertaken in a fair and reasonable way.</p>

		these have not been paid prior to consent issue) this would substantially alter the activity status of the proposal. This is important as it means that unlike development contributions, financial contributions would need to be paid prior to subdivision consent issue to avoid increased discretion during processing of the consent. In contrast the operative WDP clearly outlines in Rule 34.1.5 that it must be specified in a condition of resource consent when a payment is to be made (noting that for a subdivision consent this is prior to section 224 certification).	
Financial Contribution Standard FC-S1 Assessment Methodology	<p><i>The District Council will issue a Financial Contribution Calculation Assessment (which will be valid for three years from the date of issue) that specifies:</i></p> <ul style="list-style-type: none"> <i>a. all reasonable costs incurred or to be incurred in providing the service, utility or facility (including but not limited to; any legal, survey, design, planning, engineering costs and disbursements);</i> <i>b. any reasonable costs to avoid, remedy or mitigate any effects on the environment from intensification, and subdivision;</i> 	<p>Oppose</p> <p>There is a need to explicitly distinguish between development contributions and financial contributions to avoid duplication of payment and ensure that any financial contribution required is in response to an issue that the proposed development raises. The assessment methodology should firstly refer to whether the current Development Contributions Policy has already anticipated and provided for anticipated residential growth. If this is the case, then no further assessment should be required.</p> <p>Financial contributions should relate solely to the effects of the activity (i.e.,</p>	<p>Amend the assessment methodology to:</p> <ol style="list-style-type: none"> 1. Clearly outline that Financial Contributions would only be required where the Development Contributions Policy has not already provided for this residential growth and that financial contributions are only required for infrastructure upgrades that are directly attributable to the proposed intensification and subdivision. Potential rewording is: <p><i>The District Council will issue a Financial Contribution Calculation Assessment (which will be valid for three years from the date of issue) that specifies <u>that either:</u></i></p>

	<p>c. <i>the value of and/or the costs of acquiring any or interest in any land required for the service, utility, facility or reserve;</i></p> <p>d. <i>an allowance or adjustment for inflation; and</i></p> <p>e. <i>an allowance for the overhead costs of the Council and/or any costs associated with servicing Council expenditure in providing or upgrading a service or facility.</i></p>	<p>subdivision). The assessment methodology should outline that financial contributions are only required for infrastructure upgrades directly attributable to a proposed intensification activity and/or subdivision.</p> <p>The assessment methodology is vague and does not provide transparency for a developer to calculate what contributions they may be required to pay independently (for example they will not be able to predict what allowance and/or adjustment of inflation WDC will be applying to costs).</p>	<p>a. <u>all reasonable infrastructure costs incurred by the development have already been accounted for by the current WDC Development Contributions Policy and no further assessment is required; or that:</u></p> <p>b. <i>all reasonable costs incurred or to be incurred in providing the service, utility or facility (including but not limited to; any legal, survey, design, planning, engineering costs and disbursements);....</i></p> <p>2. To provide greater clarity for what is required from developers (enable them to read the plan and ascertain clearly what is required of them, whilst being assured that everyone is treated alike);</p> <p>3. To outline the process for how an assessment should be sought and the timing associated with obtaining one; and</p> <p>4. To clarify that any costs calculated may only be in relation to effects of the activity (with any increased wider benefit of infrastructure that goes over and above that required by the activity to be paid by Council).</p>
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<p>Financial Contribution Standard FC-S2</p> <p>Financial Contribution Calculation for Water, Wastewater and Stormwater</p>	<p><i>As part of the District Council Financial Contribution Calculation Assessment for drinking water, wastewater and stormwater the following calculation methodology will be used:</i></p> <ol style="list-style-type: none"> <i>assess whether the upgrade, extension or new infrastructure required already accounted for in growth component allowed for in the Development Contributions policy;</i> <i>assess the increase in capacity of the upgrade, extension or new infrastructure required and only charge the proportion needed to service the proposed development;</i> <i>where required to be installed on Council land and agreed to by the Council, the 100% estimated cost of all materials, installation and commissioning of a water supply booster pump and associated infrastructure to maintain water pressure in any building three or more stories in height; and</i> <i>assess provision of on-site stormwater management, and if sufficient to manage a 10 year</i> 	<p>Oppose</p> <p>The standard refers to whether the Development Contributions Policy has already anticipated and provided for anticipated residential growth, but it could be made more explicit that if it has already been accounted for then no further calculation is required.</p> <p>Matter (d) is vague and provides no certainty that if onsite stormwater management is provided to manage a 10-year storm that no financial contribution will be required. There is no reasoning for why some sites may require a 'reduced' contribution and others 'no' contribution for providing the same level of stormwater management.</p>	<p>Amend the assessment methodology to:</p> <ol style="list-style-type: none"> Clearly outline that Financial Contributions would only be required where the current WDC Development Contributions Policy has not already provided for this activity. The methodology should reflect that the reference to the Development Contributions Policy should be undertaken first. Potential rewording is: <p><i>As part of the District Council Financial Contribution Calculation Assessment for drinking water, wastewater and stormwater firstly an assessment shall be undertaken to following calculation methodology will be used:</i></p> <p><i>assess whether the upgrade, extension or new infrastructure required has already been accounted for in growth component allowed for in the Development Contributions policy. <u>If the upgrade, extension or new infrastructure required has already been allowed for in the Development Contributions policy then no further assessment is required.</u></i></p>
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	<p>storm, either no or a reduced financial contribution will be required.</p>		<p><u>If the required upgrade, extension or new infrastructure has not been provided for in the Development Contributions policy then the following calculation methodology will be used:</u></p> <ul style="list-style-type: none"> a. assess the increase in capacity of the upgrade, extension or new infrastructure required and only charge the proportion needed to service the proposed development; b. where required to be installed on Council land and agreed to by the Council, the 100% estimated cost of all materials, installation and commissioning of a water supply booster pump and associated infrastructure to maintain water pressure in any building three or more stories in height; and c. assess provision of on-site stormwater management, and if sufficient to manage a 10 year storm, either no or a reduced financial contribution will be required.
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<p>Financial Contribution Standard FC-S4</p> <p>Financial Contribution Calculation for Rooding</p>	<p><i>As part of the District Council Financial Contribution Calculation Assessment for rooding the following calculation methodology will be used:</i></p> <ol style="list-style-type: none"> <i>assess whether the upgrade of extension to or new rooding infrastructure required is already accounted for in the growth component allowed for in the Development Contributions policy;</i> <i>if not provided for in the Development Contributions policy, the cost of the upgrade extension or new rooding infrastructure will be calculated by Council;</i> <i>the percentage contribution required to be paid by the development will be calculated as follows: vehicle movements per day generated by the development divided by vehicle movements per day of the development plus vehicle movements per day of any potential additional lots that could develop plus average daily traffic: $\% \text{ contribution} = \frac{\text{vmpd development}}{\text{vmpd development} + \text{vmpd potential new lots} + \text{current average daily traffic}};$</i> <i>where new roads are required, the financial contribution will be based on a unit rate per kilometre of new road multiplied by the number of new lots divided by the existing lots plus proposed new lots; and</i> 	<p>Oppose</p> <p>The standard refers to whether the Development Contributions Policy has already anticipated and provided for anticipated residential growth, however it should be more explicit that if this is the case then no further calculation is required.</p>	<p>Amend the assessment methodology to clearly outline that Financial Contributions would only be required where the Development Contributions Policy has not already provided for this residential growth. Potential rewording is:</p> <p><i>As part of the District Council Financial Contribution Calculation Assessment for rooding firstly an assessment shall be undertaken to following calculation methodology will be used:</i></p> <p><i>assess whether the upgrade of extension to or new rooding infrastructure required is already accounted for in the growth component allowed for in the Development Contributions policy.</i></p> <p><u>If the upgrade, extension to or new rooding infrastructure required has already been allowed for in the Development Contributions policy then no further assessment is required.</u></p> <p><u>If the required upgrade, extension to or new infrastructure has not been provided for in the Development Contributions policy then the following methodology will</u></p>
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	<p>e. where land is required to be vested for roading purposes, the area of land, the value of the land, and its proposed classification, shall be specified by Council.</p>		<p><u>be used to calculate the contribution required by Council:</u></p> <p>a. if not provided for in the Development Contributions policy, the cost of the upgrade extension or new roading infrastructure will be calculated by Council;</p> <p>the percentage contribution required to be paid by the development will be calculated as follows:</p> <p>a. <u>for the costs of upgrading or extending existing roading infrastructure the percentage contribution shall be based on</u> vehicle movements per day generated by the development divided by vehicle movements per day of the development plus vehicle movements per day of any potential additional lots that could develop plus average daily traffic: % contribution = $\text{vmpd development} / (\text{vmpd development} + \text{vmpd potential new lots} + \text{current average daily traffic})$;</p> <p>b. <u>for the cost contribution associated</u> where new roads are required, the financial contribution will be based on a unit rate per kilometre of new road multiplied by the number</p>
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			<p><i>of new lots divided by the existing lots plus proposed new lots; and</i></p> <p>c. <i>where land is required to be vested for roading purposes, the area of land, the value of the land, and it's proposed classification, shall be specified by Council.</i></p>
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