

**FURTHER SUBMISSION ON VARIATION 2: FINANCIAL CONTRIBUTIONS TO THE PROPOSED
WAIMAKARIRI DISTRICT PLAN**
(Clause 8 First Schedule Resource Management Act 1991)

To: Development Planning
Waimakariri District Council
Private Bag 1005
Rangiora 7440

*Submission lodged via email –
developmentplanning@wmk.govt.nz*

Further Submission by: Momentum Land Limited

Submitter address: Momentum Land Limited
Attention: Shane Farmaid
4 Peasmoor Road
Lower Shotover
Queenstown 9304

Please note the different address for service below.

Introduction

1. This further submission is made by Momentum Land Limited (“MLL”).
2. MLL makes further submissions in support to submissions that have been made by Bellgrove Rangiora Limited (BRL) on Variation 2: Financial Contributions to the Proposed Waimakariri District Plan.
3. MLL makes these submissions as they have interests in the proposal greater than the general public because:
 - a. MLL is a development company who has a contract to purchase land at 310 Beach Road and 177 Ferry Road, Kaiapoi;
 - b. A retirement village and residential subdivision are proposed for the land;
 - c. Financial contributions may be imposed on these developments by Council; and
 - d. The outcomes of the original submission and relief sought by BRL will directly affect any financial contributions imposed by Council on future developments undertaken by MLL.

Further Submissions

4. The further submissions are detailed in the table attached as **Appendix One**.

5. A copy of the further submission will be served on BRL within five working days of it being served on the Council.

Hearing

6. MLL wishes to be heard in support of its further submissions. If others make similar submissions, MLL may be prepared to consider presenting a joint case with them at any hearing.

Submission signed for and on behalf of Momentum Land Limited



Teresa Walton
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Resource Management Group Limited
21 November 2022

Address for service:

Momentum Land Limited
C/- Resource Management Group
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Appendices:

1. Further submissions table

Appendix One – Variation 2 - Further Submissions Table

Original Submitter	Submission Point	Plan Provision	MLL's Position	Further Submission
<p>Bellgrove Rangiora Limited C/- Aurecon NZ Ltd PO Box 1061 Christchurch 8140 Attention: Mark Allan, Director – Environment and Planning</p> <p>Submitter #66</p>	66.1	General	Support	<p>Bellgrove Rangiora Limited (BRL) seek amendments to the introductory text to make it clear that financial contributions are for the purpose of partly mitigating or compensating for the impacts of development, over and above any development contribution charged. Momentum Land Limited (MLL) supports this as any further clarity that can be provided within the provisions leaves less uncertainty for the developer.</p>
	66.4	FC-P1	Support	<p>Policy FC-P1 sets out when financial contributions are required. BRL seek to amend this policy to clarify that financial contributions are not required where the effect on infrastructure is already addressed through development contributions charged under Council's Development Contributions Policy. MLL support this as it ensures that payments are not duplicated.</p>

Original Submitter	Submission Point	Plan Provision	MLL's Position	Further Submission
	66.5 and 66.6	FC-R1 and FC-R2	Support	Rules FC-R1 and FC-R2 require financial contributions to be paid when more than two residential units are established on the site, or more than two new lots are created. BRL seek amendments to clarify the process for obtaining a financial contributions assessment, and certainty as to when financial contributions must be paid by. MLL supports this as any further certainty that can be provided around the payment of financial contributions provides transparency and assists with forward planning and costs forecasting.
	66.7, 66.8 66.9, 66.10, 66.11, 66.12	FC-S1, FC-S2, FC-S4	Support	BRL seek amendments to the assessment methodology for financial contributions to ensure that (a) contributions relating to infrastructure are not charged where the Development Contributions Policy has already accounted for these and (b) financial contributions calculated shall only be in relation to effects of the activity (and not any increased wider benefits). MLL supports this as it is a fair and reasonable methodology for imposing financial contributions.

Original Submitter	Submission Point	Plan Provision	MLL's Position	Further Submission
	None provided – paragraph 18 of original submission	General	Support	BRL consider that Variation 2 insufficiently details public involvement and how recalculations or reconsiderations of financial contributions can be requested. This contrasts to the Development Contributions Policy, where there is a public process for submissions on the policy, a process for policy reviews, and a process for reconsiderations. MLL support BRL's submission point as public involvement provides a more transparent process and allows directly affected persons (e.g. developers) to be heard.