



**WHANGANUI
DISTRICT COUNCIL**
Te Kaunihera a Rohe o Whanganui

Development Contributions Policy 2024

**Submissions Received
Speaking**

Development Contributions Policy 2024

Submission # 1631

Speaking

First name: **Femi**
Last name: **Adesanya**
Organisation: **The Stylebender Limited**

Consultation Question	Submitter Feedback
-----------------------	--------------------

Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Agree

Submitter Comments: Whanganui cannot afford to be left behind in the quality of infrastructure we offer. Quality infrastructure will attract more people to Whanganui.

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Agree

Submitter Comments:

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Agree

Submitter Comments:

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- i) Community groups and trusts
- ii) Social housing

Disagree

Agree

Submitter Comments:

Proposed Housing

Development

for

The Stylebender Ltd

at

1 Buxton Road, Westmere, ,

Whanganui, NZ

B&L Scheme



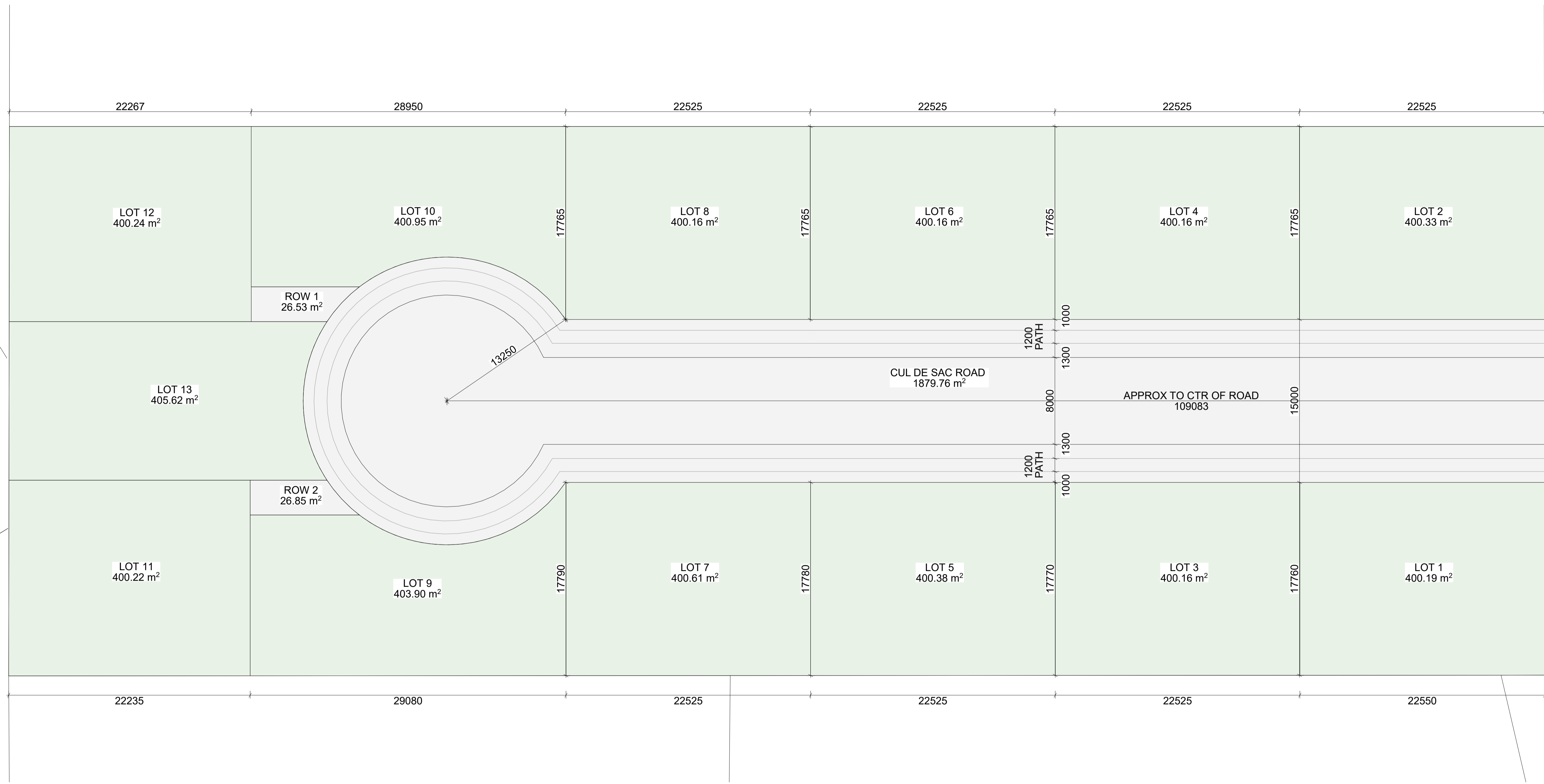
Sheet Index			
Layout ID	Rev ID	Layout Name	Date
01	00	Cover Page	18/07/2022
02	00	Proposed Site Layout	18/07/2022

Rev	Description	Date
00	B&L-WIP	18/07/2022

LEGAL DESCRIPTION

LOT: 9
 DP: 229
 SITE AREA: 7143 m²
 PLANNING ZONE: #Planning Zone
 WIND ZONE: High
 EXPOSURE ZONE: C
 EARTHQUAKE ZONE: 2

B&L CALCS	
	AREA
LOT 1	400.19
LOT 2	400.33
LOT 3	400.16
LOT 4	400.16
LOT 5	400.38
LOT 6	400.16
LOT 7	400.61
LOT 8	400.16
LOT 9	403.90
LOT 10	400.95
LOT 11	400.22
LOT 12	400.24
LOT 13	405.62
ROAD	1879.76
ROW 1	26.53
ROW 2	26.85
TOTAL	7146.21 m²



- General notes:**
- Contractor shall verify and be made responsible for all measurements on site.
 - Designer to be notified of any variation between site dimensions and those on the plans.
 - All work to be carried out in accordance with these drawings & accompanying specification. Designer to be notified of any variation.
 - All building work to be carried out in accordance with latest edition of the New Zealand Building Code.
 - All concrete masonry to be constructed in accordance with NZS 4230:2004.
 - All steel to be in accordance with NZS 3404 & AS/NZS 1170.
 - Refer to structural engineers drawings & calculations for all steel & concrete sizing & locations.
 - All timber construction to be in accordance with NZS 3604:2011.

Proposed Housing Development

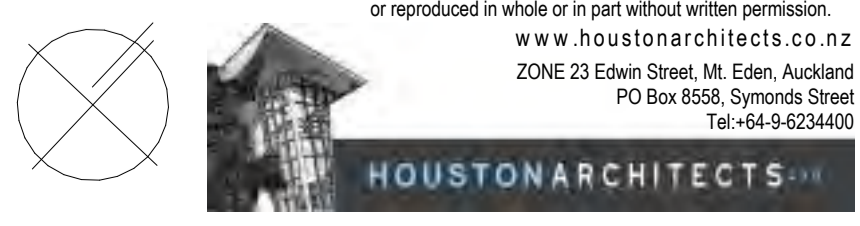
for **The Stylebender Ltd**
 at 1 Buxton Road, Westmere,
 Whanganui NZ

B&L Scheme
 Proposed Site Layout

DATE	18/07/2022
SCALE	1:200, 1:1 @A1
PROJECT #	??

Rev	Description	Date
00	B&L-WIP	18/07/2022

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 PO Box 8558, Symonds Street
 Tel: +64-9-6234400



Development Contributions Policy 2024

Submission # 856

Speaking

First name: **Colin**
Last name: **Anderson**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Disagree

Submitter Comments: This is an unfair burden on the developer.

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Agree

Submitter Comments: A simple rule should apply to all areas.

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Disagree

Submitter Comments: Occupancy based is subjective and not accurate.

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- | | | |
|-----|-----------------------------|-----------------|
| i) | Community groups and trusts | Disagree |
| ii) | Social housing | Disagree |

Submitter Comments: High density developments such as social housing place extreme demands on infrastructure far in excess of a large single dwelling on the same Lot size.

Supporting documents

Development Contributions Policy 2024

Submission # 273

Speaking

First name: **Steven**
Last name: **Archer**
Organisation: **A & C Surveys Limited**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Disagree

Submitter Comments: Targeted rates spread the costs and does not deter development. Similarly, the positive benefits of development are spread within the community.

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Disagree

Submitter Comments: It is not conducive to the District Plan which contains objectives and policies to promote infill development and utilizing existing infrastructure. Infill development is already marginal with high development costs. The DC District wide charges tabled will deter small infill development by private individuals.

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Disagree

Submitter Comments: Too subjective. NZ statistics indicates there is little correlation between size of dwelling/parcel and number of occupants.

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- i) Community groups and trusts **Agree**
- ii) Social housing **Agree**

Submitter Comments: I am in favour of this, although it seems to be inconsistent with a policy which is based on demand

Supporting documents

Submission_Supportingtxt.pdf

The draft policy is difficult to understand, complicated, and subject to interpretation.

It appears to have been rushed without sufficient consultation

The unit rate is too expensive for rural land and infill subdivision

It is not conducive to the District Plan which contains objectives and policies to promote infill development and utilizing existing infrastructure. Infill development is already marginal with high development costs. The DC District wide charges tabled will deter development by private individuals.

I disagree that Development Contributions be applied at s224 certification of subdivision. Bare land values in Whanganui are not as high as other cities, and developers have to carry a large outlay until sale of the last allotment. HEU demand is not apparent until a building consent is applied for.

Development Contributions Policy 2024

Submission # 226

Speaking

First name: **Lance**
Last name: **Attrill**
Organisation: **Attrill Group**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Agree

Submitter Comments: Please see attached DCs need to go up in price however should be used in the area they are collected - not District wide.

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Disagree

Submitter Comments:

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Disagree

Submitter Comments:

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- i) Community groups and trusts
- ii) Social housing

Disagree

Agree

Submitter Comments:

2 May 2024

RE: NEW DEVELOPMENT CONTRIBUTION POLICY SUBMISSION – Attrill Group

The proposed new Development Contribution policy is not ready to be accepted for the below reasons;

- The policy is too hard to understand, too ambiguous and has too many loop holes.
- The Whanganui District Council has not been fully transparent with the whole town and how it could affect them. It is currently hidden under the heading of "Development" or "Developers" however it will affect people who want to subdivide their property or construct a new bedroom.
- The policy forces people to try find ways around paying the development contribution instead of accepting them.
- If they are charged at Code of Compliance stage, people will avoid applying for a code of compliance. It needs to be charged at building consent stage.
- The affordability of future developments becomes an issue and it may not be feasible for developers to develop future sections for the town.
- The public, builders and designers have not been clearly made aware of the policy and how it effects them or their potential clients
- Development Contributions should be used in the area that the payment has been collected from, not anywhere in the town.
- It will devalue some peoples properties over night.
- It is pushing the cost of building and sections up which the Government is trying to lower.
- Stormwater calculations on impervious surfaces such as patios and driveways, should **not** be taken into consideration

Example; When a couple have owned a property and paid rates for 20+ years and they wish to subdivide their backyard to build a house to retire in. They now have to pay up to \$20,000+ for Development contributions. If this back section is smaller than 400m², they will also have to put in a wastewater tank and pump which is another \$10-\$15,000. This is not fair for the couple who are not 'developers' and have just set themselves up well.

Builders: This policy will encourage "bad behaviour" by builders

Public: 99% of the public are unaware of this proposed policy

Attrill Group: We have existing subdivision consents and Developers Agreements. These are all arranged under the Development Contributions 2018 Policy. This should be the end of Development Contributions on these subdivisions and sections. No further Development Contributions should be applied to any sections or house on these subdivisions.

We do support Development Contributions that are affordable, appropriate and fair.

We **do not** support the new policy that has been proposed. Further consultation, communication and consideration is required before a new policy should be introduced. It would be recommended that

developers work with the WDC to find a solution for a fair and reasonable Development Contribution Policy.

Suggestion;

A committee could be formed of 2 developers, 2 builders, 3 Waters manager, Development Engineer, 2 town planners, 2 WDC Councillors and 2 community representatives, to discuss how to establish an acceptable Development Contribution Policy.

I would like to speak at the hearing relating to this proposed policy

Lance Attrill – Attrill Group (Attrill Properties, Attrill Developments, Attrill Residential, NSK Holdings, ALK Property)

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Development Contributions Policy 2024

Submission # 229

Speaking

First name: **Din**
Last name: **Bandara**
Organisation: **First Rung**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Neutral

Submitter Comments: As First Rung Trust, we hope to collaborate with the council on developments. We would appreciate the opportunity to negotiate the contribution if this is to be adopted.

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Agree

Submitter Comments:

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Neutral

Submitter Comments:

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- | | | |
|-----|-----------------------------|--------------|
| i) | Community groups and trusts | Agree |
| ii) | Social housing | Agree |

Submitter Comments: As First Rung Trust, we hope to collaborate with the council on developments. We would appreciate the opportunity to negotiate the contribution if this is to be adopted.

Supporting documents

20240502%20First%20Rung%20Trust%20Whanganui
%20District%20Council%20LTP%20submission.pdf



First Rung Trust Whanganui District Council LTP submission

The First Rung Trust is dedicated to implementing innovative home ownership programs in the Whanganui district, fostering housing-related education, and contributing to the supply of quality homes in the area. Our initiatives encompass a spectrum of activities, including but not limited to land acquisition, property development, rental and sales management, tenant support, and educational outreach on housing matters.

Comprised of professionals from diverse fields such as law, finance, church ministry, and community engagement, our board shares a common commitment to enhancing the housing landscape in Whanganui.

Since September 2022, the First Rung Trust has been collaborating with Homes For People Trust, based in Palmerston North. Inspired by the significant impact achieved by the organisation in Manawatu and Horowhenua, we have been supported by their expertise in our endeavours to address housing challenges in Whanganui.

Over the past few years, Homes For People Trust has successfully constructed 29 homes in the Manawatu and Horowhenua regions, providing housing for numerous families and significantly benefiting the community. Presently, the Trust has an additional 29 properties in various stages of development. With this in mind, there exists a mutual recognition of the benefits of replicating their successful model in our district.

In April 2024, the First Rung Trust joined forces with Homes For People to acquire our inaugural property, located at 7 Gilmour Street, Gonville. Identified as a prime location for addressing various community needs, such as housing for first-time buyers, the elderly, and healthcare workers, this site holds immense potential. Positioned between two council-owned lots, there is an opportunity for collaboration with the Whanganui District Council (WDC) to optimize its usage, aligning with recent Council communication (10 April 2024) on addressing the housing shortage.

Looking ahead, the First Rung Trust and Homes For People envision further community investments across mixed tenure developments. We aim to foster meaningful partnerships with the WDC, leveraging our collective resources to make a positive impact on our community.

First Rung would welcome the opportunity to speak to our submission and elaborate on how our projects will positively impact the Long Term Plan (LTP) and the community as a whole.

Sincerely,

A handwritten signature in blue ink that reads 'Craig Harris'. The signature is fluid and cursive, written in a professional but personal style.

Craig Harris

Board Chair

First Rung Trust

E: info@firstrung.org.nz

M: 027 666 6031

Development Contributions Policy 2024

Submission # 187

Speaking

First name: **James**
Last name: **Barron**
Organisation: **Chair - Progress Castlecliff**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Agree

Submitter Comments:

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Disagree

Submitter Comments: We note this would raise more funding from outer suburbs like Castlecliff with sections more likely to have infill subdivision and housing than inner suburbs. This may adversely affect the development of badly needed new housing. We are also concerned on possible implications for Iwi led affordable housing developments intended for Castlecliff. We DISAGREE STRONGLY with the extension of development contributions to Castlecliff while Castlecliff continues to pay 8.9% more general rates under Whanganui's LV based calculation.

Aramoho

-3.5% Bastia/Durie Hills
Putiki

8.0%
Castlecliff

-8.9%
Gonville

-7.6%
Springvale

7.6% St
Johns/Otamatea

8.9% Whanganui
Central

0.6% Whanganui
East

-2.1% .

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Agree

Submitter Comments: We broadly support this as being equitable and perhaps mildly encouraging of smaller, more affordable homes over “MacMansions” but again note that Council adoption of CV for General Rates would do far more to ensure larger dwellings (which are able to accommodate more people and have higher CV’s) will be paying higher levels of General Rates than this change to development levy policy.

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- i) Community groups and trusts
- ii) Social housing

Agree

Submitter Comments: We agree with extending the rates remission policy to Community Groups and Trusts and social housing but are concerned that this should be available fairly It should be based on the USE of a property not the Ownership of a property ie - should be available where a property is rented/used for public good - not be given where the property is not in use for public good - should be available to mixed commercial developments there is a mix of uses (examples being the Gonville, Castlecliff. Hakeke St and Aramoho libraries) on condition the rebated rates are pro rata (ie normal rates are paid on the proportion NOT used for public good AND the full amount if any rebate is passed back to the

Community Group/Trust or social housing tenant by the landlord as lower OPEX or rental.

Supporting documents

Development Contributions Policy 2024

Submission # 251

Speaking

First name: **Graham**
Last name: **Dack**
Organisation: **Amdram Theatre - President**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates? **Agree**

Submitter Comments:

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area? **Agree**

Submitter Comments:

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions? **Disagree**

Submitter Comments:

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- i) Community groups and trusts **Agree**
- ii) Social housing **Agree**

Submitter Comments:

Supporting documents

Development Contributions Policy 2024

Submission # 491

Speaking

First name: **Paul**
Last name: **Hausia**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates? **Agree**

Submitter Comments:

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area? **Agree**

Submitter Comments:

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions? **Agree**

Submitter Comments:

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- i) Community groups and trusts **Agree**
- ii) Social housing **Agree**

Submitter Comments:

Supporting documents

Development Contributions Policy 2024

Submission # 497

Speaking

First name: **Graham**
Last name: **Holloway**

Consultation Question	Submitter Feedback
-----------------------	--------------------

Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Agree

Submitter Comments: WDC MUST establish the true cost of connecting to WDC infrastructure including the impact of more connections have on it. Absolutely no subsidising or discounts of any kind. e.g. power companies charge what it costs for connection. WDC learn from it please

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Agree

Submitter Comments: The rule here, pay your way or stay away. No subsidising. HAS TO STOP

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Agree

Submitter Comments: As already stated.

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- i) Community groups and trusts **Disagree**

ii) Social housing

Disagree

Submitter Comments: All the new connections & fees are a true cost, and must be paid no exceptions. Council have been aware of this problem for a long time & David Langford made comment that was in the Whanganui Chronicle 26.8.23, so why the delay. Govt agencies also absolutely no exemption - if they dont pay NO PERMIT

Supporting documents

Holloway%2C%20Graham%20-%20DCs%20Policy.pdf

Whanganui District Council

28/04/24

Graham Holloway 0275 440 406
31 Nixon St
Whanganui East

re SUBMISSION COUNCIL POLICY and BYLAWS

Whanganui District Council has been negligent towards its existing ratepayer base, by carrying on charging LOW DEVELOP FEES, ie like to connections to our infrastructure system at the peril of the existing ratepayers whom then are charged for that shortfall. This is proven by the exorbitant rate increase us seniors are now forced to pay because someone else is getting a good deal. The Whanganui Chronicle on Sat 26/08/23 published an article re this problem, proving WDC have been aware of it for some time, and have NOT ACTIONED THE PROBLEM. Hence being negligent.

There is absolutely no reason why existing ratepayers should be expected to pick up the cost, in any form. There is absolutely no excuse to NOT up the costs significantly to what was in the article. And if YA DONT WANT TO PAY STAY AWAY and pay HIGHER somewhere else. A perfect example of this is the property at 4 Springvale Rd, where it is proposed to build many townhouses. Article was in Whanganui Chronical 27/11/23. Its the same theory that WDC has towards parking. There is NO discount for excuses, JUST PAY THE PARKING TICKET, and if you dont there are consequences.

RE UTILITIES

Also with regard to infrastructure, I propose that WDC hold our UTILITIES to count when they dig up WDC areas, and do a shoddy patch up. I had discussion with DAMION WOOD some time ago bout this problem that to expect ratepayers to pay for the reconstruction of WDC assets. My proposal would be that the UTILITIES are responsible for their reinstatement work to carry the same effective lifetime warrenty that WDC would put on the if undisturbed area. A perfect case in point is the crap footpath in Jones st from a Telco job some time ago. And added to the proposal is that if a utility changes ownership, SO DOES THE REPAIR. Damion said that the UTILITIES wont like it, and I replied NOR DO WE. He also said that he thinks it is a great idea because it looks after ratepayers interests. A point is that although the UTILITIES WONT LIKE IT, if they do a proper job from the outset, it wont be an issue. Added to the proposal is that if a UTILITY has work done, and WDC are not informed of it as required, WDC can dig again and find the culprit and FINE THEM ACCORDINGLY.

Uneven surfaces for us seniors to walk on are a big issue, and moreso the likes of me thru an accident in 1976, dont life my feet very far, I just have to have my shoe get caught on a risen edge, and I AM THEN OVER. That then becomes a WDC issue like what happened to me here in NIXON ST last year, and WDC repaired the area with a dash of speed because WDC know it is part of their DUTY OF CARE and when they fail with their duty of care, then the saying THE SMELLY BROWN STUFF HITS THE FAN.as it should.

PARKING and GROWTH OVER FOOTPATHS

I propose that WDC have parking a vehicle the WRONG WAY AROUND eg must face the way of driving, A BY LAW VIOLATION, and an immediate fine just like the Police do. I accept that Police dont do it here in Whanganui because of a WDC parking department. So its needs sorting.

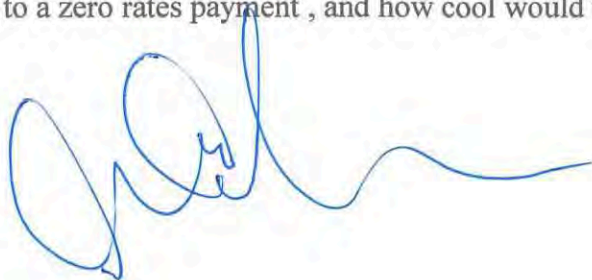
With regards to growth of vegetation from properties over the footpath, that to be made an advertised by law by adjacent property owners of the footpath network to ensure their srubbery and tree growth DOES NOT IMPACT THE FOOTPATH NETWORK. I propose a large FINE for this to be in order, but first a council notice to the culprit with what is required with a short remedy period, and then if NO ACTION THE FINE. No excuses not to, furthermore if the property owner allows it

to happen again, well then the FINE BECOMES INSTANT, with an increase for not complying.

I understand that CENTRAL GOVERNMENT has set fines for LOCAL COUNCIL, however thru their stupidity, the fines that can be obtained are like POCKET MONEY because they are so low and outdated, and it is too expensive for local authorities to administer for what is obtained in the fine, so in escence the culprits dont care.

WDC needs to pressure Central Govt, along with other local authorities, that Central Govt needs and should relinquish ALL LOCAL BODY FINES CONTROL and let the LOCAL BODIES SET FINES THEMSELVES, to their own circumstances. That will also help keep rates down for those whom dont do stupid stuff and behave as good citizens should because it would be like putting a FINES METER ON THE IDIOTS. If someone could design a FINES METER FOR IDIOTS, we might then get to a zero rates payment , and how cool would that be.

Graham Holloway

A handwritten signature in blue ink, appearing to read 'Graham Holloway', with a long horizontal flourish extending to the right.

Development Contributions Policy 2024

Submission # 812

Speaking

First name: **Stephen**
Last name: **Lace**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Neutral

Submitter Comments: You have not provided enough information. Also, the incoming GOVT has said that it will require Councils to consent / identify enough land to cater to 30 years of growth. Surely your policies and charges need to take account of changed Government policy and a presumed desirability of making home ownership much more affordable?

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Agree

Submitter Comments: I agree that the burden on the city occupants should be spread more equitably unless there is good reason to incentivise development in a particular area. However, Councils costs requiring contributions must be well managed.

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Agree

Submitter Comments: I agree that larger homes should pay a higher levy/contribution. However, this also raises the question of whether all properties should at least in part be rated based upon number of occupants.

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- | | | |
|-----|-----------------------------|----------------|
| i) | Community groups and trusts | Neutral |
| ii) | Social housing | Neutral |

Submitter Comments: You have not provided enough detail on the level of remission.

Supporting documents

Development Contributions Policy 2024

Submission # 725

Speaking

First name: **Jessica**
Last name: **McKenzie**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Neutral

Submitter Comments:

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Agree

Submitter Comments: Seeing the Mill Road area expanding is great!

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Agree

Submitter Comments: Totally agree. Same with the old census info gathering. A larger house with more people required more everything right! Makes sense.

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- | | | |
|-----|-----------------------------|----------------|
| i) | Community groups and trusts | Neutral |
| ii) | Social housing | Agree |

Submitter Comments: Hello, tent city. It's sad. There are people living ON and IN St John's Hill. And along the river by the train sculpture. Something needs to change. Not a good look, but more importantly, I have heard people have been intimidated walking along the river. Makes a cycle/walkway a waste of money, if that tent town gets any bigger, no one will be using it eh.

Supporting documents

Development Contributions Policy 2024

Submission # 196

Speaking

First name: **William**
Last name: **Morrell**
Organisation: **Bullocks Group**

Consultation Question	Submitter Feedback
-----------------------	--------------------

Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates? **Agree**

Submitter Comments:

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area? **Agree**

Submitter Comments:

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions? **Agree**

Submitter Comments:

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- i) Community groups and trusts **Neutral**
- ii) Social housing **Neutral**

Submitter Comments:

Supporting documents

Bullocks%20Group%20Submission%20to%20WDC%20on%20Development%20Contribution%20Policy%20-%20%202%20May%202024.pdf

2 May 2024

Bullocks Group Submission on the Proposed “Development Contribution Policy”

First and foremost, the Bullocks Group would like to thank the Whanganui District Council for opportunity to comment on the proposed ‘Development Contribution Policy’.

While Bullocks are supportive of the Council’s intent to introduce development contributions, we do have some concerns which largely revolve around the complexity/readability of the policy, the lack of adequate consultation and the intended speed of implementation. We are not convinced that the Council has adequately drawn-in a range of development stakeholders into the development of this policy which we feel needs to be implemented in more reasonable timeframes to ensure that it does not lead to perverse outcomes for the Whanganui community, nor work against national efforts to build new and affordable homes.

We provide some high-level feedback below:

Consultation and Proposed Introduction:

1. We do support the introduction of Development Contributions that are affordable, fair and introduced in a reasonable timeframe.
2. In general, however we do not think the general public, designers and construction companies have been adequately informed of the proposed policy and how it may affect the community, city growth, business confidence, and potential clients.
3. The relatively short consultation timeframe between submission close-off and the proposed introduction date of the new policy casts a shadow on the sincerity of the present consultation process. It appears that Council is set on quickly implementing a DC policy and we query the little time they have to adequately address, integrate and consult on submission feedback within the proposed timeframes?
4. The short implementation period does not reflect that many development/subdivision projects that are currently underway have been initiated and budgeted in the absence of development contribution fees which form another barrier to housing development in our community.

Case Example: we have found the Council engagement process with our proposed subdivision in Bedford Avenue to be difficult and protracted. While we appreciate that the Council is resource constrained, turn-around times for advice have been slow and the quality and timeliness of policy, roading and infrastructure advice has at times been inconsistent. The development process has been further confounded by Council staff who have encouraged us to consider intensification of our proposed development in the absence of adequate WDC guidelines and policies for this type of infill. Outcome =

protracted lead times for a project that was hatched and budgeted long before the development of this newly proposed DC policy.

Working Group Approach:

5. To garner buy-in and ensure fairness we also believe that the Council should consider a working group style approach to finalise the DC policy. As it stands the draft policy, in our view, lacks pragmatism and is not an easy read for those who do not have a planning or policy background.

Concern at the added cost to development and building:

6. The proposed introduction of development contribution comes at a precarious time for many developers, businesses and construction companies. With a depressed housing market, escalating building costs and high interest rates, we believe that Council should take a slow and/or staged approach with the introduction of fees which will ultimately increase the cost of new builds and further discourage building and buyers.

Infill subdivision and intensification:

7. We feel that the proposed policy does not adequately reflect the policies and intent of the 2020 *National Policy Statement for Urban Development* that attempts to encourage intensification and urban infill. We consider the proposed costs for urban infill subdivision and subdivision of non-green field development to be unreasonably high.

Flexibility and site development costs:

8. All subdivisions are located within unique locations that will have different draws on services and different development benefits for the communities. In this context we strongly encourage the Council to avoid a one-size fits all approach to the application of development contributions. Council must have a robust and pragmatic approach to each subdivision as they consider the level of DC costs.
9. While Council will be keen to simplify the application of development fees we strongly encourage a robust mechanism that gives consideration to the draw on services and the extent to which the given development/subdivision supports infrastructural development and the community. *For example, it would be unfair to expect a development located right next to the river to necessarily contribute the same DC fees to a more remote development that intensively relies on new or existing SW infrastructure. A similar argument could be made around proximity to waste water mains or roading infrastructure.*

In closing: In our 95 years of experience, subdividing land is a difficult, expensive, complex and protracted exercise. While land development can be profitable there is a high level of risk when the market falls – a risk that is fully born by the developer. While we fully appreciate the need to spread the burden of infrastructure and service costs we believe the Council needs to take a slower and more consultative approach to ensure that this proposed policy has stronger buy-in and does not adversely impact Whanganui businesses, developers and would-be home owners. We believe that the new policy must carefully reflect established urban development policies, strongly encourage high-quality development, and retain a high-degree of flexibility and pragmatism.

Bullocks Group

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Gonville
Whanganui

Contact Person:

Willy Morrell



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Development Contributions Policy 2024

Submission # 193

Speaking

First name: **Jamie**
Last name: **O'Leary**
Organisation: **Jamie O'Leary Builders Ltd**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Disagree

Submitter Comments: Even Council staff are unable to give me a clear & concise answer as to how/where these levies/fees will be applied & implemented. While fees increase over time due to inflation and associated costs it is pointless to increase development contributions to offset the burden of rates when rates will continue to increase in coming years at the current levels being notably higher than the rate of inflation.

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Disagree

Submitter Comments: Make this new pathway too difficult & expensive, it will 'discourage' not encourage development. Cost is critical for any development. A committee needs to be setup to work through all issues & end up with a robust and workable levy system that is palatable to all parties. The general public is very unaware of what is being proposed or the significant cost impact it will have on them in the future. A committee should be setup to clarify and improve all aspects of the proposed policy, if it must go ahead in some way, to ensure things are introduced in a manageable way, to ensure the public and industry clearly knows what they are in for and that they understand clearly how future fees and charges will impact their development planning

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Disagree

Submitter Comments: The calculation system for that has been proposed has been rushed and put together in such a way that is too hard to understand - its simply too much too fast and too soon. Feedback also suggests Council staff are not fully verse and able to answer queries and provide consistent answers on what final levies would be in some instances. Its also counter intuitive to introduce new levies to simple alteration and extension work where an additional room will incur extra fees to Council - this will simply make those jobs too expensive in many cases and the end result will be a lack of growth in these areas.

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- i) Community groups and trusts
- ii) Social housing

Neutral

Neutral

Submitter Comments: Development benefits the City & the community. This proposal/levy needs careful consideration & consultation. This is way too fast and not at well thought out & it will end badly. For every action there will be a reaction. We need considerably more dialogue, consultation, discussion & input from all affected parties. This is imperative.

Supporting documents

Development Contributions Policy 2024

Submission # 232

Speaking

First name: **Anthony**
Last name: **O'Leary**
Organisation: **Stonewood Homes Whanganui**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Disagree

Submitter Comments: While fees increase over time due to inflation and associated costs it is pointless to increase development contributions to offset the burden of rates when rates will continue to increase in coming years at the current levels being notably higher than the rate of inflation. There is no transparency on how development levies will be spent to verify its solely used for infrastructure development and not general Council project and asset management

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Disagree

Submitter Comments: For high development areas it makes some sense to have some form of development levies. For areas of little or slow growth this seems pointless. Why impose further penalties and charges on infill development when there are already significant extra compliance aspects to navigate already adding significant costs quality infill development options should be being encouraged by Council - by adding further costs it will simply discourage this from happening in the future meaning the projected increase in dwellings will not hit Council forecast targets. The general public is grossly unaware of what is being proposed or the significant cost impact it will have on them in the future. A committee should be setup to clarify and improve all aspects of the proposed policy, if it must go ahead in some way, to ensure things are

introduced in a manageable way, to ensure the public and industry clearly knows what they are in for and that they understand clearly how future fees and charges will impact their development planning

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Disagree

Submitter Comments: The calculation system for that has been proposed has been rushed and put together in such a way that is too hard to understand - its simply too much too fast and too soon. Feedback also suggests Council staff are not fully verse and able to answer queries and provide consistent answers on what final levies would be in some instances. Its also counter intuitive to introduce new levies to simple alteration and extension work where an additional room will incur extra fees to Council - this will simply make those jobs too expensive in many cases and the end result will be a lack of growth in these areas. The general public is grossly unaware of what is being proposed or the significant cost impact it will have on them in the future. A committee should be setup to clarify and improve all aspects of the proposed policy, if it must go ahead in some way, to ensure things are introduced in a manageable way, to ensure the public and industry clearly knows what they are in for and that they understand clearly how future fees and charges will impact their development planning

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- i) Community groups and trusts
- ii) Social housing

Neutral
Neutral

Submitter Comments: Any development has a certain amount of community benefit and a benefit to the Council as a whole. By offering relief to some projects and not others is a slanted view on holistic benefit. There is no way to properly gauge the community benefit and cost benefit to the city of Whanganui. A consistent approach to any relief on levies should be applied to assess the benefit to the

community of any project based widely agreed
standards and parameters

Supporting documents

Development Contributions Policy 2024

Submission # 111

Speaking

First name: **William**
Last name: **Payne**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Agree

Submitter Comments: If a developer wants to build a neighborhood and they require power and plumbing infrastructure for it than they should be liable for some of the cost. I wanted 3-phase electricity installed on my house and I paid for it because I wanted it.

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Agree

Submitter Comments: If a developer wants to build a neighborhood and they require power and plumbing infrastructure for it than they should be liable for some of the cost. I wanted 3-phase electricity installed on my house and I paid for it because I wanted it.

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Neutral

Submitter Comments: My issue with this is that if a larger dwelling has the same infrastructure requirement as a smaller dwelling for example power and waste than why should it pay more. I would need to look further into this subject.

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- | | | |
|-----|-----------------------------|--------------|
| i) | Community groups and trusts | Agree |
| ii) | Social housing | Agree |

Submitter Comments: We do need to do something to allow these groups to have developments. Especially when developers are often not marketing towards lower economic groups.

Supporting documents

Development Contributions Policy 2024

Submission # 1287

Speaking

First name: **Matt**
Last name: **Perks**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Disagree

Submitter Comments: I recognize the importance of Development Contributions in supporting the growth and infrastructure of our city. Given the substantial increase from \$0 to \$17,025 per Household Equivalent Unit (HEU), it is evident that developers are already contributing significantly to the funding of necessary infrastructure. This increase should logically alleviate some of the financial pressures on the city's rates. However, I believe it's essential to carefully assess the current impact of these contributions on offsetting rate burdens before considering any further increases. It's crucial to ensure that we maintain a fair balance that supports growth without disproportionately affecting developers or ratepayers.

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Agree

Submitter Comments:

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Agree

Submitter Comments: I support the shift from a site-based to an occupancy-based assessment for

residential development, as it aligns more accurately with the actual impact that different sized dwellings have on the city's infrastructure. However, to fully support this approach, I believe it is essential to add more clarity around the assessment criteria for multi-unit and infill housing developments. These types of developments are becoming increasingly common and present unique challenges and impacts on infrastructure. Clear, detailed guidelines on how development contributions are calculated for these dwellings will help ensure that all developers are on a level playing field and understand their contributions towards community growth. This will not only promote equity but also encourage thoughtful residential planning, leading to more sustainable urban development practices.

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- i) Community groups and trusts
- ii) Social housing

Disagree
Disagree

Submitter Comments: I have reservations about the fairness of this approach. While social housing initiatives are crucial and support vulnerable segments of our community, the financial relief provided to these projects shifts a disproportionate amount of the financial burden onto other developers, including the average hardworking Kiwi. In my view, if social housing projects receive remissions, there should be a more balanced approach to ensure that the costs are equitably distributed. It's important that all members of the community contribute fairly to the infrastructure they use. Therefore, I believe we need a revised framework that still supports social housing but also considers the broader impact on all developers and homeowners in the community. This could involve a tiered or partial remission system that balances support for social housing with a reasonable contribution to community resources, thereby maintaining fairness for all parties involved.



To Whom It May Concern,

I am writing to formally request the opportunity to speak at the upcoming council hearing scheduled for May 14-15. My presentation will focus specifically on the need to introduce incentives for sustainable stormwater management in our development contributions policy.

While I have completed the questionnaire concerning various aspects of the Development Contributions Policy, I wish to address the council in person regarding a crucial aspect not covered by my previous responses: incentivizing the use of soak pits for stormwater management in residential and commercial developments.

Proposal for Stormwater Management Incentives

Our city has a significant opportunity to improve environmental outcomes and infrastructure efficiency by adopting soak pits for stormwater disposal. These systems allow for the natural absorption of stormwater back into the earth, alleviating pressure on our municipal stormwater systems and enhancing groundwater recharge.

Suggested Amendment to Policy

I propose that the council introduces an amendment to the Development Contributions Policy that provides a rebate or reduction in stormwater-related contributions for developers who install soak pits or similar sustainable stormwater management systems. This initiative would recognize and financially reward the efforts of those contributing positively to our community's environmental health and infrastructure resilience.

Benefits of the Proposal

- **Environmental Sustainability:** Encourages practices that support natural water cycles and reduce urban runoff.
- **Long-term Cost Savings:** Potentially decreases the need for expensive upgrades and expansions of municipal stormwater facilities.
- **Innovation in Development:** Supports and incentivizes developers to consider advanced, eco-friendly technologies in their projects.
- **Community Engagement:** Demonstrates the council's commitment to sustainable development practices, enhancing community support and involvement.

Conclusion

By speaking at the hearing, I aim to highlight the importance of forward-thinking policies that align with both our community's environmental goals and the practical needs of development. I believe that providing incentives for sustainable stormwater management will serve the long-term interests of Whanganui, fostering a more resilient and environmentally conscious urban landscape.

Thank you for considering my request. I am keen to contribute to this important discussion and share insights that could benefit our community and council planning.

Development Contributions Policy 2024

Submission # 45

Speaking

First name: **George**
Last name: **Russell**
Organisation: **Projoin Developments Ltd**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Submitter Comments:

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Submitter Comments:

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Submitter Comments:

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- i) Community groups and trusts
- ii) Social housing

Submitter Comments:

Supporting documents

Submission.pdf

2 May 2024

WDC PROPOSED DEVELOPMENT CONTRIBUTIONS POLICY (2024)

Submission - PROJOIN DEVELOPMENTS LTD

In consideration of the policy introduction presented at the “Developers Forum” held 2 April 2024 and subsequent circulation of 38 the page PDC Policy Document .

Firstly we acknowledge the considerable work that has been done and the opportunity to now comment on the proposed policy before its implementation. We also acknowledge the need to generate funds for growth outside of ratepayer revenue and therefore support the **concept of** Development Contributions .

We do however have concerns regarding the process of consultation and speed proposed introduction. We also have concerns around a one size fits all approach in regard Urban Infill Developments.

Feedback points

1. The time line from WDC sharing the policy document / receiving feedback submission / public hearing / consideration of submissions through to implementation does not reflect a sincere motivation by council to adequately engage with developers in the process.
Was there any direct consultation with local developers during the policy writing phase ?
2. The length of time a development project may take from “the idea” through to an RC application can be measured in years not weeks or months.
There will no doubt be many projects in planning phase with a financial model without existing budget for development contributions. The speed of implementation of new DC policy could well tip the viability balance on these projects.
3. We note the DC for Urban Infill is lower than other areas however the blanket approach in assessing by the same formula within UI group is not fair and reasonable. It may well make it easier for council implement but will also potentially hold back some projects from even starting due to the borderline financial outcome.
The council must fully consider case by case situations and the true cost / burden on council funding to support any given project.
4. With a national policy and apparent local enthusiasm for development of medium density housing within urban infill areas care needs to be taken that DC

implementation doesn't discourage developers further. Especially given current economic downturn and increased development & building costs. Growth within the city and residential land / housing development relies on development **companies and individuals** who are prepared to **invest** - money, a lot of time and energy and take on risk.

Projoin Developments Ltd
37 Bedford Ave
Whanganui

Contact – George Russell

Mobile [REDACTED]

Email [REDACTED]

Development Contributions Policy 2024

Submission # 1486

Speaking

First name: **Bradley**
Last name: **Slater**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates? **Agree**

Submitter Comments:

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area? **Agree**

Submitter Comments:

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions? **Disagree**

Submitter Comments:

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- | | | |
|-----|-----------------------------|----------------|
| i) | Community groups and trusts | Neutral |
| ii) | Social housing | Neutral |

Submitter Comments:

Supporting documents

Development Contributions Policy 2024

Submission # 125

Speaking

First name: **Anthonie**
Last name: **Tonnon**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Neutral

Submitter Comments: I'd just say we need to incentivise more development in brownfields and be careful not discourage that.

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Agree

Submitter Comments: I'd like to see higher contributions in an area like this where it makes infrastructure and PT more expensive to provide

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Neutral

Submitter Comments: Concerned about this initially as I'd like to see more density.

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- | | | |
|-----|-----------------------------|--------------|
| i) | Community groups and trusts | Agree |
| ii) | Social housing | Agree |

Submitter Comments:

Supporting documents

Development Contributions Policy 2024

Submission # 1366

Speaking

First name: **David**
Last name: **Watson**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Agree

Submitter Comments: My understanding is that development contributions are ring fenced for the provision of infrastructure so can't be used to offset rates. That said I think that they should be leveraged to promote better buildings practices that reduce the need for more infrastructure (in particular stormwater).

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Agree

Submitter Comments: Anything that puts pressure on public infrastructure or services should pay development contributions.

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Disagree

Submitter Comments: We need to be encouraging denser development closer to the city centre such as flats and duplexes. We also need more multi-generational homes. Yes we should be charging higher fees to large under-occupied buildings (but the size per occupant not the overall size) or buildings that use a lot of land such as lifestyle blocks.

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- | | | |
|-----|-----------------------------|--------------|
| i) | Community groups and trusts | Agree |
| ii) | Social housing | Agree |

Submitter Comments: There should be a mechanism to determine the value of the community benefit on a case by case basis and the discount should reflect that.

Supporting documents

Development Contributions Policy 2024

Submission # 3

Speaking

First name: Terry
Last name: Wycherley

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates?

Disagree

Submitter Comments: The council needs to seriously consider what they are doing. Increased council development contributions will only increase the price of building and discourage people from moving to Wanganui.

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area?

Agree

Submitter Comments: I agree that contributions should be extended to all areas, but the fee should be the same for all.

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions?

Disagree

Submitter Comments: All fees should be the same.

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

i) Community groups and trusts **Neutral**

ii) Social housing

Neutral

Submitter Comments:

Supporting documents

Development Contributions Policy 2024

Submission # 110

Speaking

First name: **Peter**
Last name: **Zolno**

Consultation Question	Submitter Feedback
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Off-setting Rates

Do you agree that the amount of Development Contributions collected should be increased in order to offset the burden on rates? **Agree**

Submitter Comments:

Extension of areas

Do you agree with the extension of the Development Contributions Policy to the whole of Whanganui District – this includes all existing suburbs and the Mill Road Industrial Area? **Agree**

Submitter Comments:

Residential Development

Do you agree with a change from a site-based to an occupancy-based assessment for residential development, with larger dwellings paying higher levels of development contributions? **Neutral**

Submitter Comments:

Remissions

Please indicate your level of agreement with the inclusion of the following remissions within the Development Contributions Policy.

- i) Community groups and trusts **Agree**
- ii) Social housing **Agree**

Submitter Comments: Kainga Ora needs to match a higher bar to receive these funds – true community engagement in their plans, rather than dumping

them on the community. They have a horrible track record on this

Supporting documents