

Topic	Issue	Sub Issue	Sub ID	Sub Point	Name	Inclination	Summary	Decision Req
PC73-01: Section 32	1: General		1	1	NZ Transport Agency	Support with Amendment	NZTA supports financial contributions on roading, including strategic roads to promotes sustainable management of physical resources	Retain Plan Changes 73, subject to the amendments sought in other submission points.
			3	1	S & L Consultants Ltd	Support with Amendment	Support the principle of reducing financial contributions to facilitate affordable housing.	Retain Plan Change 73, subject to the amendments included in this submission.
			5	1	Veros Property Partners	Support with Amendment	In general, the decision to review of financial contributions imposed on subdivision is supported. The proposed plan change is a significant step in making development more affordable in the greater Western Bay region	Retain Plan Changes 73, subject to the amendments on included submission points.
			5	2	Veros Property Partners	Oppose	The table provided, at the end of the proposal, is complicated to follow. Under the proposal development is charged, more or less, on a per hectare ratio. However, the table is complex and results in a per square meter rate for developable area with no definition. It would be simpler to understand and calculate if it was based on a value per developable hectare with the option to use a per lot value	A definition for developable land would be required. This methodology would be consistent with modelling and does not assume development efficiency (net developable area), as this ranges significantly from development to development.
			5	5	Veros Property Partners	Oppose	The table provided, at the end of the proposal, is complicated to follow. Under the proposal development is charged, more or less, on a per hectare ratio. However, the table is complex and results in a per square meter rate for developable area with no definition. It would be simpler to understand and calculate if it was based on a value per developable hectare with the option to use a per lot value.	A definition for developable land would be required. This methodology would be consistent with modelling and does not assume development efficiency (net developable area), as this ranges significantly from development to development.
			6	1	Charley Farley Ltd	Support	Proposed Plan Change 73 is supported.	Retain proposed Plan Change 73
			7	1	Omokoroa Developments Ltd	Support	Proposed Plan Change 73 is supported	Retain proposed Plan Change 73
			8	1	The Grange Joint Venture	Support	Proposed Plan Change 73 is supported.	Retain proposed Plan Change 73.
			9	1	Neil Construction Ltd	Support	Support the principle of reducing financial contributions to facilitate affordable housing.	Retain Plan Changes 73, subject to the amendments on included submission points.
			10	1	ACCO Building Limited	Support	Proposed Plan Change 73 is supported	Retain proposed Plan Change 73
			11	1	Classic Group Oxford Limited	Support	Proposed Plan Change 73 is supported	Retain proposed Plan Change 73
			12	1	Dorr Bell Limited	Support	Proposed Plan Change 73 is supported	Retain proposed Plan Change 73
			13	1	Young, Bill	Support	Proposed Plan Change 73 is supported.	Retain proposed Plan Change 73.

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			14	1	Reynolds, Graeme	Support	Proposed Plan Change 73 is supported.	Retain proposed Plan Change 73.
	3: Residential		2	1	Lomay Properties Limited	Support with Amendment	Per hectare size is not in line with market demand.	Increase lot size.
	5: Timing of Payment		5	4	Veros Property Partners	Oppose	Financial Contributions should be split over subdivision and building consents. This is more reflective on actual or 'real' demand for infrastructure.	Pay some of the financial contributions at subdivision consent stage and the rest at building consent stage.
			6	4	Charley Farley Ltd	Oppose	Although the quantum of FINCO's payable per lot is proposed to be reduced under Plan Change 73, the timing applied to the payment will continue to have a significant impact on the number of sections created. In addition to the options considered, Council should consider the option of changes to the charging mechanisms in the context of this timing of charging.	Defer some of the financial contributions to building consent stage.
			7	4	Omokoroa Developments Ltd	Oppose	Although the quantum of FINCO's payable per lot is proposed to be reduced under Plan Change 73, the timing applied to the payment will continue to have a significant impact on the number of sections created. In addition to the options considered, Council should consider the option of changes to the charging mechanisms in the context of this timing of charging.	Defer some of the financial contributions to building consent stage.
			8	4	The Grange Joint Venture	Oppose	Although the quantum of FINCO's payable per lot is proposed to be reduced under Plan Change 73, the timing applied to the payment will continue to have a significant impact on the number of sections created. In addition to the options considered, Council should consider the option of changes to the charging mechanisms in the context of this timing of charging.	Defer some of the financial contributions to building consent stage.
			10	4	ACCO Building Limited	Oppose	Although the quantum of FINCO's payable per lot is proposed to be reduced under Plan Change 73, the timing applied to the payment will continue to have a significant impact on the number of sections created. In addition to the options considered, Council should consider the option of changes to the charging mechanisms in the context of this timing of charging.	Defer some of the financial contributions to building consent stage.
			11	4	Classic Group Oxford Limited	Oppose	Although the quantum of FINCO's payable per lot is proposed to be reduced under Plan Change 73, the timing applied to the payment will	Defer some of the financial contributions to building consent stage.

## Summary Report - Plan Change 73 - Financial Contributions

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							continue to have a significant impact on the number of sections created. In addition to the options considered, Council should consider the option of changes to the charging mechanisms in the context of this timing of charging.	
			12	4	Dorr Bell Limited	Oppose	Although the quantum of FINCO's payable per lot is proposed to be reduced under Plan Change 73, the timing applied to the payment will continue to have a significant impact on the number of sections created. In addition to the options considered, Council should consider the option of changes to the charging mechanisms in the context of this timing of charging.	Defer some of the financial contributions to building consent stage.
			13	4	Young, Bill	Oppose	Although the quantum of FINCO's payable per lot is proposed to be reduced under Plan Change 73, the timing applied to the payment will continue to have a significant impact on the number of sections created. In addition to the options considered, Council should consider the option of changes to the charging mechanisms in the context of this timing of charging.	Defer some of the financial contributions to building consent stage.
			14	4	Reynolds, Graeme	Oppose	Although the quantum of FINCO's payable per lot is proposed to be reduced under Plan Change 73, the timing applied to the payment will continue to have a significant impact on the number of sections created. In addition to the options considered, Council should consider the option of changes to the charging mechanisms in the context of this timing of charging.	Defer some of the financial contributions to building consent stage.
PC73-02: Changes to Section 11 - General	1: General		1	2	NZ Transport Agency	Oppose	It is unclear how this plan change seeks to change the financial contribution elements of the recent Post Harvest agreements. Provision 11.3(b)(vi) states that a financial contribution is required for "land use consent applications for significant expansion to the Post Harvest Zone". It is unclear if this provision is a rule or how it fits within the existing rule framework, particularly within the context of Post Harvest Zone Rule 22.4.1(r) and 22.4.3 that trigger a financial contribution for any increase in throughput above the consent level or for the upgrading and storage of crops other than kiwifruit or avocado.	Clarify when and how financial contributions would apply to a Post Harvest Zones, and what a "significant" expansion to the Post Harvest Zone is, or retain existing provisions unchanged.

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PC73-03: Section 11.4 - Calculation of Financial Contributions as included in Council's Fees and Charges	1: Section 11.4.2 - Infrastructure to which Financial Contributions apply		2	7	Lomay Properties Limited	Support	New provisions are proposed to recognise situations whereby on site methods are utilised to mitigate the effects of additional run off. These provisions are appropriate and necessary particularly in cases where Council's stormwater network does not have additional capacity.	Retain 11.4.2
			4	1	Harrison Grierson Consultants Ltd	Support	New provisions are proposed to recognise situations whereby on site methods are utilised to mitigate the effects of additional run off. These provisions are appropriate and necessary particularly in cases where Council's stormwater network does not have additional capacity.	Retain 11.4.2
PC73-04: Section 11.5 - Calculation of Financial Contributions for dwellings and minor dwellings	1: Inside Identified Growth Areas - General		2	2	Lomay Properties Limited	Oppose	The provision for reductions and waivers (section 11.3 (d)) is not proposed to be amended however this seems to conflict with the new provisions which allow for specific assessment of the financial contributions through the resource consent process.	It is considered appropriate that there is a mechanism through the resource consent process to consider and determine the appropriate level of contributions in line with specific resource consent and development proposals for all financial contribution levies.
			2	4	Lomay Properties Limited	Support with Amendment	Any system of charging contributions needs to be effective and simple to administer and be capable of being updated and implemented across development and infrastructure planning over the long term. We note that the application of financial contributions based on a per ha assessment will need to be recorded and applied to future development to avoid double counting. This will present some difficulties for implementation and may open the process up to manipulation.	Council will need to be satisfied that this model can work effectively in terms of future demand on services.
			3	2	S & L Consultants Ltd	Oppose	For clarity it is desirable to have planning maps clearly identifying which areas come within the urban growth areas specified.	Provide FINCO 'catchment' maps clearly identifying areas subject to different FINCO regimes.
	2: Contributions based on 12 dwellings/ha		2	3	Lomay Properties Limited	Oppose	Due to the shape and size of a parent lot, a subdivision often results in a number of back lots with a common access strip. As these access strips are part of the lot, it will result in a larger average lot size, which impact on financial contributions (which is based on an average lot size).	Increase the standard 625m <sup>2</sup> lot size or exclude the area of a lot that is solely used for access from the average lot size calculation.

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			2	8	Lomay Properties Limited	Support with Amendment	While this average land area will not necessarily provide a practical average for all development sites, the 625m <sup>2</sup> is a much superior standard than the earlier provision which was previously notified. This new average area should be maintained or increased.	Maintain or increase the standard 625m <sup>2</sup> area for a household equivalent.
			3	3	S & L Consultants Ltd	Oppose	It would be useful to clearly show how the formula works to calculate actual FINCO's within the Plan. Although reasonably clear in the supporting documentation to ensure certainty of interpretation the formula should be explicitly stated for residential developments.	Provide formula/method to clearly demonstrate how FINCO's will be calculated.
			3	4	S & L Consultants Ltd	Support with Amendment	To ensure that the intent is clear it would be useful to make explicit that the "additional lot" is only in regard to residential lots.	Amend 11.5.2 (ii) to read as follows: "Each additional lot for residential purposes or dwelling ....."
			3	5	S & L Consultants Ltd	Support with Amendment	The Proposed Plan Change states that: "Financial contributions for a subdivision with an average lot size smaller than 500m <sup>2</sup> shall be determined by a special assessment".  It is understood from discussion with Council staff that this is intended to be applicable to "Residential" zoned land only rather than "Medium Density" zoned land where the density is required to be less than 500m <sup>2</sup> and the zoning has taken into consideration infrastructure requirements. This is not explicitly stated in the Plan Change.	Amend Section 11.5.2 to ensure that this provision does not apply to Medium Density zoned land. The second sentence should read: "In the Residential Zone, financial contributions for a subdivision with an average lot size smaller than 500m <sup>2</sup> ...." Or words to that effect.
			3	6	S & L Consultants Ltd	Oppose	The Proposed Plan Change states that: "Financial contributions for a subdivision with an average lot size smaller than 500m <sup>2</sup> shall be determined by a special assessment".  There is no obvious assessment criteria stated as to what the basis for the "special assessment" will be and it is unclear as to whether this changes the status of an application or how it is to be addressed. For infill subdivisions it is likely that they will often result in lots less than 500m <sup>2</sup> and there needs to be greater certainty as to what FINCO quantum's will apply. These are unlikely to lead to any increased pressure on infrastructure than already anticipated.	Provide assessment criteria and clarify any implications to activity status.  Exempt infill subdivision from special assessment requirements.
			3	8	S & L Consultants Ltd	Support with Amendment	The FINCO formula has been derived to give effect to a 12 lot per hectare yield basis. However there are situations where this density is being	Ensure that any development that meets the 12 lot per hectare of developable land basis has FINCO's that are no greater than

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							met but the formula results in a much higher FINCO than the 'current quantum' which is inconsistent with the intent. A FINCO 'ceiling' needs to be provided. These situations will be when the developments do not need to provide public roading and the lots on average will be larger than 625m <sup>2</sup> . With larger lots these are likely to have better capacity for on-site stormwater management by having proportionally a larger area of pervious surfaces and less need for public reserve areas while still likely to generate the same effects on roading, water and sewerage systems as smaller sites. Although the general philosophy of a more compact urban footprint is supported it is still desirable to have a mix of urban form and there is a risk of a 'sameness' of design based on minimising FINCO costs.	the 'base' area FINCO.
			4	2	Harrison Grierson Consultants Ltd	Oppose	In some cases developers will undertake a staged subdivision to create land blocks designed for future subdivision, These blocks may be on sold to other developers. Financial Contributions should not be levied on 'development' blocks as this would artificially inflate the level of contributions on the initial stage of the subdivision which will not in itself provide the final development yield.	Provide a mechanism to exclude lots from paying a per ha contribution where the subdivision potential is reserved for a future stage. A land area threshold may be necessary to implement this rule, for example 1 ha.
			5	3	Veros Property Partners	Oppose	A per hectare (or similar) ratio with no controls encourages small lot subdivision and does not encourage diversity of section size.	An implemented cap at a suitable level (\$25,000 per lot) would ensure the value difference does not prejudice section size.
			9	2	Neil Construction Ltd	Oppose	It would be useful to clearly show how the formula works to calculate actual FINCO's within the Plan. Although reasonably clear in the supporting documentation to ensure certainty of interpretation the formula should be explicitly stated for residential developments.	Provide formula/method to clearly demonstrate how FINCO's will be calculated.
			9	3	Neil Construction Ltd	Support with Amendment	To ensure that the intent is clear it would be useful to make explicit that the "additional lot" is only in regard to residential lots	Amend 11.5.2 (ii) to read as follows: "Each additional lot for residential purposes or dwelling ....."
			9	4	Neil Construction Ltd	Support with Amendment	The Proposed Plan Change states that: "Financial contributions for a subdivision with an average lot size smaller than 500m <sup>2</sup> shall be determined by a special assessment".  It is understood from discussion with Council staff that this is intended to be applicable to "Residential" zoned land	Amend Section 11.5.2 to ensure that this provision does not apply to Medium Density zoned land. The second sentence should read: "In the Residential Zone, financial contributions for a subdivision with an average lot size smaller than 500m <sup>2</sup> ...." Or words to that effect.

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							only rather than "Medium Density" zoned land where the density is required to be less than 500m <sup>2</sup> and the zoning has taken into consideration infrastructure requirements. This is not explicitly stated in the Plan Change.	
			9	5	Neil Construction Ltd	Oppose	The Proposed Plan Change states that: "Financial contributions for a subdivision with an average lot size smaller than 500m <sup>2</sup> shall be determined by a special assessment". There is no obvious assessment criteria stated as to what the basis for the "special assessment" will be and it is unclear as to whether this changes the status of an application or how it is to be addressed.	Provide assessment criteria and clarify any implications to activity status.
	3: Land Use Consent for a Retirement Village Dwelling or Independent Apartment		4	3	Harrison Grierson Consultants Ltd	Support with Amendment	<p>This rule provides a standard reduction from the HHE for 1 and 2 bedroom units in a retirement village. This approach is supported and it is widely recognised that retirement units place a lower demand of infrastructure networks per unit than residential dwellings.</p> <p>However, it is considered that individual assessments should be undertaken based on the nature and type of retirement village which is proposed. Retirement villages will provide a range of villa/unit typologies ranging from 'lifestyle' units for young retirees right through to full medical care units.</p> <p>The plan provisions should therefore enable specific assessment of retirement village applications based on the actual scale and nature of villas and units proposed.</p>	That the rule be amended to enable specific assessment of retirement villages based on a case by case assessment.
	4: Definition of Net Developable Area		2	6	Lomay Properties Limited	Oppose	In a number of situations, there will be geotechnical constraints on a site and these will be addressed by building line restrictions, consent notices for specific designs and/or specific recommendations on foundation design, i.e. mandatory pile foundation. The current definition will lead to some ambiguity as to what area is included and what is excluded. It is not clear whether the exclusion apply to post development or pre development. In many cases the geotechnical constraints will be mitigated by site earthworks and geotechnical recommendations for future development.	Clarify in more precise terms the exclusion for areas that are geotechnically constrained.

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			3	7	S & L Consultants Ltd	Oppose	The Plan includes a definition for Net developable hectare which for the most part has been taken into consideration in the FINCO rules. However as currently written the method for calculating the applicable FINCO does not explicitly exclude "geotechnically constrained" land which may often be incorporated into lot areas. This results in the land area being 'inflated' and similarly the applicable FINCO charge.	Amend method to explicitly exclude geotechnically constrained land for purposes of calculation.
			9	6	Neil Construction Ltd	Oppose	The Plan includes a definition for Net developable hectare which for the most part has been taken into consideration in the FINCO rules. However as currently written the method for calculating the applicable FINCO does not explicitly exclude "geotechnically constrained" land which may often be incorporated into lot areas. This results in the land area being 'inflated' and similarly the applicable FINCO charge.	Amend method to explicitly exclude geotechnically constrained land for purposes of calculation.
PC73-05: Section 11.6 - Calculation of Financial Contributions - Commercial and Industrial	1: List of Activities that have to undertake an Integrated Transportation Assessment		1	3	NZ Transport Agency	Oppose	Financial contributions provide the ability to mitigate effects through the contribution of land or money or both (S. 108(9) of the RMA). By excluding Industrial and Commercial zone subdivisions and activities Council is limiting the ability to mitigate effects from a development where a financial contribution may be appropriate. While some specific activities have been included to undertake an Integrated Transport Assessment, it is unclear why only these activities have been identified. The proposed approach does not facilitate a 'beneficiary pays' approach.	That Council include provisions to require financial contributions (being land/money or both) for activities and subdivisions located in industrial and commercial zones.  That Council undertake additional Section 32 analysis that demonstrates the rationale for the approach taken.
PC73-06: Miscellaneous	1: Miscellaneous		2	5	Lomay Properties Limited	Oppose	Financial contributions in the District are significant higher than other area and therefore a disincentive for development.	Look at means to reduce financial contributions
			6	2	Charley Farley Ltd	Support with Amendment	There is still a significant imbalance in the "cost" of developing a section between Tauranga City and the Western Bay of Plenty District. Until this cost imbalance is corrected and the cost to produce a section in the District is on par with Tauranga, the growth of Katikati will continue to struggle when Tauranga is a more affordable alternative.	Make it more affordable to develop in the District.
			6	3	Charley Farley Ltd	Support with Amendment	Ensure that there are no items included in Structure Plans that are not a priority.	Review the capital projects included in Structure Plans and their timing for construction.



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			7	2	Omokoroa Developments Ltd	Support with Amendment	There is still a significant imbalance in the "cost" of developing a section between Tauranga City and the Western Bay of Plenty District. Until this cost imbalance is corrected and the cost to produce a section in the District is on par with Tauranga, the growth of Katikati will continue to struggle when Tauranga is a more affordable alternative.	Make it more affordable to develop in the District.
			7	3	Omokoroa Developments Ltd	Oppose	Ensure that there are no items included in Structure Plans that are not a priority.	Review the capital projects included in Structure Plans and their timing for construction.
			8	2	The Grange Joint Venture	Support with Amendment	There is still a significant imbalance in the "cost" of developing a section between Tauranga City and the Western Bay of Plenty District. Until this cost imbalance is corrected and the cost to produce a section in the District is on par with Tauranga, the growth of Katikati will continue to struggle when Tauranga is a more affordable alternative.	Make it more affordable to develop in the District.
			8	3	The Grange Joint Venture	Oppose	Ensure that there are no items included in Structure Plans that are not a priority.	Review the capital projects included in Structure Plans and their timing for construction.
			10	2	ACCO Building Limited	Support with Amendment	There is still a significant imbalance in the "cost" of developing a section between Tauranga City and the Western Bay of Plenty District. Until this cost imbalance is corrected and the cost to produce a section in the District is on par with Tauranga, the growth of Katikati will continue to struggle when Tauranga is a more affordable alternative.	Make it more affordable to develop in the District.
			10	3	ACCO Building Limited	Oppose	Ensure that there are no items included in Structure Plans that are not a priority.	Review the capital projects included in Structure Plans and their timing for construction.
			11	2	Classic Group Oxford Limited	Support with Amendment	There is still a significant imbalance in the "cost" of developing a section between Tauranga City and the Western Bay of Plenty District. Until this cost imbalance is corrected and the cost to produce a section in the District is on par with Tauranga, the growth of Katikati will continue to struggle when Tauranga is a more affordable alternative.	Make it more affordable to develop in the District.
			11	3	Classic Group Oxford Limited	Oppose	Ensure that there are no items included in Structure Plans that are not a priority.	Review the capital projects included in Structure Plans and their timing for construction.
			12	2	Dorr Bell Limited	Support with Amendment	There is still a significant imbalance in the "cost" of developing a section between Tauranga City and the Western Bay of Plenty District. Until this cost imbalance is corrected and	Make it more affordable to develop in the District.

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			12	3	Dorr Bell Limited	Oppose	Ensure that there are no items included in Structure Plans that are not a priority.	Review the capital projects included in Structure Plans and their timing for construction.
			13	2	Young, Bill	Support with Amendment	There is still a significant imbalance in the "cost" of developing a section between Tauranga City and the Western Bay of Plenty District. Until this cost imbalance is corrected and the cost to produce a section in the District is on par with Tauranga, the growth of Katikati will continue to struggle when Tauranga is a more affordable alternative.	Make it more affordable to develop in the District.
			13	3	Young, Bill	Oppose	Ensure that there are no items included in Structure Plans that are not a priority.	Review the capital projects included in Structure Plans and their timing for construction.
			14	2	Reynolds, Graeme	Support with Amendment	There is still a significant imbalance in the "cost" of developing a section between Tauranga City and the Western Bay of Plenty District. Until this cost imbalance is corrected and the cost to produce a section in the District is on par with Tauranga, the growth of Katikati will continue to struggle when Tauranga is a more affordable alternative.	Make it more affordable to develop in the District.
			14	3	Reynolds, Graeme	Oppose	Ensure that there are no items included in Structure Plans that are not a priority.	Review the capital projects included in Structure Plans and their timing for construction.