

Submission on WCC development contributions policy

30 November 2021

Inner City Wellington (ICW) seeks that the development contributions policy helps to achieve the goals of the green network plan in the inner-city residential area (policy mapzone q), by way of:

- further increasing the parks and reserves catchment specific charge; and
- broadening the base of this charge by requiring a parks and reserves catchment specific charge for non-residential development.

The draft green networks plan, adopted on 27 October 2021, highlights: 'there are few incentives or requirements for private development contributions to the city's green network'. However, there is no reference to this in any of the consultation documentation for this policy, which we consider a key omission that requires further consideration.

Increasing the catchment specific charge

When comparing the proposed parks and reserves catchment specific charge for the inner city residential area to the existing policy, there is only an increase of \$507 per equivalent housing unit. Considering the heavy lifting the inner city residential area has been doing over the since the policy was last updated 6 years ago, and is forecast to keep doing over the coming years, this increase seems a bit light – especially considering how much inner city land values have likely risen over the past 6 years which makes it even harder to use these contributions towards acquiring land for new inner city parks and reserves.

We also note that both the current and proposed development contribution charges are much lower than other cities in New Zealand, particularly in relation to reserves contributions. We request that the green networks plan, with some urgency of meeting its goals on a limited council budget, is taken fully into account when setting this final charge.

Broadening the base

Wellington City Council does not require a parks and reserve contribution from non-residential development, only residential development – in both the current and proposed policy. This is the case city wide but differs from Hutt City Council's ethos as they do require reserves contributions from both residential and non-residential development, as they consider this all puts extra pressure on parks and reserves. We

consider that the council should reconsider their position, particularly in relation to the inner city residential area where the highest proportion of residential growth is anticipated.

We also noted that an 2019 <u>amendment</u> to the Local Government Act 2002 (LGA) repealed Section 198A which restricted councils from requiring reserves related development contributions for non-residential development. We see this as a blessing from central government that councils should not exclude non-residential development from providing for reserves – especially in high growth areas such as the central city.

Indexing of charges

We support the proposal that charges may be adjusted for inflation annually as permitted by the LGA, and go further by requesting that this does happen every year.

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