From:

Lindsay [lindsay.richards@xtra.co.nz]

Sent:

Saturday, 25 June 2011 11:05 pm

To:

11-12 Annual Plan

Subject:

Submission for Draft Annual Plan . . .

Attachments: WRA Submission.doc

MDA Culturianian des

Dear Sir/Madam

Attached is a submission from the Westmorland Residents Association, relating to traffic management in the Westmorland area, that we would like to be considered as part of the Draft Annual Plan.

We have also sent a copy of the submission to the Riccarton-Wigram Community Board, and their representative will speak to the submission, on our behalf, at the Draft Annual Plan hearing next week.

Many thanks, and kind regards

Lindsay Richards

Lindsay Richards On behalf Westmorand Residents Association



22 Penruddock Rise Westmorland CHRISTCHURCH 8025

24 June 2011

### SUBMISSION TO COUNCIL ON TRAFFIC ISSUES RELATING TO WESTMORLAND

The Westmorland Residents' Association would like to make representation to Council on the lowering of the speed limit on Cashmere Road, between Oderings Nursery to Hendersons Road. In addition, the Association requests traffic management measures be put in place to better facilitate the increased amount of traffic on that stretch of roadway, particular in so far as it relates to traffic entering and exiting the Westmorland subdivision.

The Association has long advocated lowering the speed limit on this particular stretch of Cashmere Road, but previous approaches to Council have been denied on a variety of grounds, including comparisons with other roads in similar situations, and study findings from such bodies as the NZTA and the NZ Police.

On this occasion however, the Association believes that both a reduction in the speed limit and the introduction of traffic management measures are needed to address problems which are occurring as a result of changed traffic patterns in the area.

An increase in the number of Westmorland residents joining or leaving Cashmere Road on a daily basis, and a significant increase in the amount of traffic using Cashmere Road generally, due to changed traffic flows, now make some action necessary, the Association believes.

In response to previous submissions, Council has argued that the Cashmere Road speed limit is consistent with that of similar roads, such as Milns Road. The Association notes, however, that the Milns Road speed limit has now been reduced to 50kph. It is our contention that Cashmere Road is no more rural than Milns Road, yet carries far more traffic by comparison.

In the interests of better traffic flow, and the safety of our residents, we strongly urge Council to consider the following:

- Reduce the speed on Cashmere Road, between Oderings Nursery and Henderson Road, to 50kph.
- Extend the length of what the Association imagines is supposed to be a "merging lane" on Cashmere Road (at the intersection of Penruddock Rise), so that it allows traffic heading towards the city on Cashmere Road, and traffic turning right from Penruddock Rise, to merge without incident and reduces the traffic buildups that occur at present.

 Position prominent signage on Penruddock Rise, and on Cashmere Road (either side of the junction) to warn traffic of the existence of the merging lane, and provide simple instructions on how to use it properly.

The Westmorland Residents' Association appreciated the opportunity to make this submission to Council, and looks forward to a favourable outcome.

Yours faithfully

Lindsay Richards

On behalf <u>Westmorland Residents' Association</u>



From:

Geoff & Cherie Barnes [geoff.barnes@xtra.co.nz]

Sent:

Sunday, 26 June 2011 10:57 am

To:

11-12 Annual Plan

Subject: Annual Plan Submission

Submission on the Draft Annual Plan 2011/2012

### **Rating Policy**

1. The proposed Rating Policy does not disclose the assessed impact of the reduced rates payable by those rating units where demolition has or will occur. The policy acknowledges that rates will reduce but gives no indication of the fiscal impact. The majority of the proposed demolitions are scheduled and estimates of the other property to be demolished can be made.

In the past this was allowed for by setting rate decimals 0.25% higher than the strict calculation would require allowing for extra unaccounted for rates revenue. However these are extraordinary times and full disclosure in the Annual Plan of the extent the possible rating revenue shortfall should be made with an explanation of how the revenue will be achieved.

### Submission:

That the Annual Plan Funding Impact Statement includes an assessment of the impact of building demolitions on rates revenue and how the Council proposes to make up the shortfall.

### 2. Uniform Annual General Charge

The UAGC remains at \$100 plus GST. It has been at this level for many years.

Under the proposed system the increase in rates proposed will fall unfairly on higher valued properties due to two factors:

- Total rates required has increased (significantly) yet the UAGC portion remains fixed
- Demolitions following the earthquake will reduce the capital values resulting in a shift in incidence in General rates (by capital values) to those properties remaining intact.

The time is appropriate for a modest increase in the UAGC – say an additional \$100 (plus GST) per rating unit. The current policy will result in rates increasing by a high percentage resulting in several hundred dollars on some ratepayers many of whom are experiencing the same difficulties as ratepayers in lower valued properties.

#### Submission:

That the UAGC increase to \$200 plus GST for the 2011/2012.

**Geoff Barnes** 

35 Overdale Drive

Cashmere

From: victoria andrews [andrews.davis@clear.net.nz]

**Sent:** Sunday, 26 June 2011 5:38 pm

To: 11-12 Annual Plan

Cc: Richardson, Pam (Private); Reid, Claudia Subject: a brief submission in support of CCC libraries

I would like to strongly support the current or an enhanced level of funding for all CCC libraries. As a rural ratepayer our Akaroa library is critical to the area and outer bays especially now following the 22 February earthquake. The library is a lifeline of books, magazines, DVDs/CDs and internet service for those unable to get into the City.

As petrol prices continue to increase the fact that we have an active and well run library provides much more than just books. The Akaroa Library is a focal and meeting point for individuals in the community, many of whom are elderly and cannot drive far.

I have visited most of the libraries in Christchurch over the past few months and note that they have all been full of adults and children using all available services on offer. At all times the librarians serve members of the public in a kind and professional manner even when bursting with visitors. You should be very proud of both the level of service and by the usage of these Council operated public facilities.

Please continue to support or possibly increase funding to all Christchurch and Banks Peninsula libraries in the annual plan. I read recently that some Councillors were considering cutting funding. Doing so would be most unwise. Libraries bind families and communities together. Money is tight not only for the Council but for most ratepayers many of whom have children and elderly parents to contend with and provide for. Libraries provide an economic service at a reasonable cost to the Council and ratepayers.

I understand there will be a 'Beach' created along Cashel Mall for Show Weekend in an effort to attract shoppers to the area. I cannot see the point of spending money on such an activity especially when there are so many real beaches in proximity to residents. Given our current situation with it would seem prudent to redirect this funding to where it can do the most good, give more money to Christchurch libraries.

Thank you for your consideration of this submission. Victoria Andrews
PO Box 102
Akaroa 7542
03-304-7769

From: Michael Patterson [michaeljuly@windowslive.com]

Sent: Sunday, 26 June 2011 6:22 pm

To: 11-12 Annual Plan

11 - AnnualPlan@ccc

Drucilla Kingi - Patterson Tuatara\_films

\$10.000 New logo for Christchurch City

\$ 60.000 Establishment of Canterbury Earthquake Museum Trust

\$60.000 Establishment of Canterbury Olympic & Commonwealth Games Association Trust Start fundraising for covered 50m pool 4million for Christchurch - pool 20million Put team together to put in a bid for 2026 Commonwealth Games in Christchurch

2016 Develope New Regent Street into a film set

Develope Cathedral square.

( more detail send by mail )

From: Cheryl Andrew [cherylandrew@slingshot.co.nz]

**Sent:** Sunday, 26 June 2011 6:25 pm

To: 11-12 Annual Plan

Subject: feedback on rates remission

To Whom it may Concern,

I would like to urge the Christchurch City Council to provide a 100% remission on rates for residents that have lost their homes and had their land severely damaged due to the earthquakes suffered from September onwards. It is unacceptable and unfair to collect rates for services that are not being used, due to residents that have been forced to leave the city based on the above mentioned devastating events.

Yours Sincerely Cheryl Andrew



From: ChristchurchCityCouncilOnlineForm@ccc.govt.nz

**Sent:** Sunday, 26 June 2011 7:24 pm

To: 11-12 Annual Plan

Cc: katie\_nimmo@hotmail.com
Subject: Draft Annual Plan 2011/12

Are you completing this feedback	For yourself
If you are representing a group or organisation, how many people do you represent?	
My feedback refers to	Summary version
Page no(s)	
Contact name	Katie Nimmo
Organisation name (if applicable)	
Organisation role (if applicable	
Contact Address	152 MacKenzie Ave Roimata
Postcode	
Phone Number (day)	027 4144 058
Phone Number (evening)	3890 115
Email (if applicable)	katie_nimmo@hotmail.com
Email Address for Copy of Submission	katie_nimmo@hotmail.com
Date	26 June 2011
Please be as specific as possible to help us understand your views. What do you want the Council to consider? What specific action do you	1) a lot of people - including kids and Mums with push chairs cross Ensors Road from Charles St to MacKenzie Ave. It's the quickest way to get kids to the Woolston Primary school, and many don't bother to go to the wee crossing further up the road. Can anything be done to make this spot safer?
think the Council should take? Why should this be done? Please refer to the specific page(s) of the draft Annual Plan 2011/12.	2) Woolston village has been badly affected by the earthquake and there is a lot of potential for long term betterment and regeneration for the area. An urban planning process not dissimilar to the ones taking place for Sydenham and Lyttleton will have a lot of value. The 'Share an Idea' process worked very well for the city centre and could be replicated in, and for Woolston village. It is now a familiar brand and people understand how it works.
	3) there has been lot of discussion about the Avon river and how cycle ways and walk ways could be built along side in areas damaged by the earthquake. There has been no corresponding discussion about the Heathcote river. However there is real potentia for significant recreation opportunities, improved amenity values, better cathment management, and increased awareness of industria heritage sites if cycleway and walkways are developed north of the Opawa bridge along the river to the estuary. There needs to be better linking of cycle way and walk ways along the entire length of

better linking of cycle way and walk ways along the entire length of

the Heathcote river. These improvements can be made alongside any subsequent engineering activities required to manage the river post earthquake damage.

\*

This electronic email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed.

The views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Christchurch City Council.

If you are not the correct recipient of this email please advise the sender and delete.

Christchurch City Council http://www.ccc.govt.nz

\*

From:

 $Christ church City Council Online Form @\,ccc.govt.nz$ 

Sent:

Sunday, 26 June 2011 7:40 pm

To: Cc: 11-12 Annual Plan tribeco@xtra.co.nz

Subject: Draft Annual Plan 2011/12

Are you completing this feedback	For yourself
If you are representing a group or organisation, how many people do you represent?	
My feedback refers to	Full version
Page no(s)	,
Contact name	Rodney Tribe
Organisation name (if applicable)	
Organisation role (if applicable	
Contact Address	19 Compton Street Woolston Christchurch
Postcode	8062
Phone Number (day)	021 2261258
Phone Number (evening)	
Email (if applicable)	
Email Address for Copy of Submission	tribeco@xtra.co.nz
Date	26 June 2011
Please be as specific as possible to help us understand your views. What do you want the Council to consider? What specific action do you think the Council should take? Why should this be done? Please refer to the specific page(s) of the draft Annual Plan 2011/12.	My submission on the Draft Annual Plan is as follows  (1) I oppose the recommendation of council Earth Quake Levy  My opposition is due to my belief that council have not, in their determinations, taken into account all possible avenues of funds available through potential grants, nor have they taken sufficient steps to look at overall costs of council to reduce the burden to ratepayers in these unprecedented time.  I also oppose any levy which is not specifically time bound, the current recommendation is open ended, if councils figures and assumptions are correct then a time constraint is appropriate.  If Council do resolve to strike a levy, I further feel this should be specific for the purposes outlined. That it should be used only when alternative sources of funding for the intended use are not available of prove unsuccessful (eg the CEAT, Mayoral Fund, and any other Trusts and or Funds setup as a result of the Canterbury Earthquakes). And that upon completion of envisaged works any

(2) I oppose the options in relation to the \$45M V-Base debt transfer and further funding

My opposition is that council have not given due consideration to (s.62) and (s.63) of the LGA in proposing these options. I have communications from council that opinions on these areas were deemed not relevant and as such were not included in the earlier proposals to council. The communication further stated that Council were assuming responsibility for repayment of the debt, it is not providing a guarantee (s.62). I have also been advised that this is viewed as an equity investment, My contention here is that council assuming responsibility for repayment of the debt in whatever context this is being proposed must trigger (s.62) of the LGA â? oProhibition on guarantees etcâ? also stipulates indemnity and securities and as such I believe was relevant.

I also consider the transfer of debt to council relevant under s.63 which clearly states;

â?oA local authority must not lend money, or provide any other financial accommodation, to a council-controlled trading organisation on terms and conditions that are more favourable to the council-controlled trading organisation than those that would apply if the local authority were (without charging any rate or rate revenue as security) borrowing the money or obtaining the financial accommodation.â?

I believe that the transfer of debt/ equity investment is providing a â? ofinancial accommodationâ? to a CCTO on terms far more favourable that council could in fact obtain the same accommodation, in fact if council could obtain said accommodation this debt transfer would be rates neutral.

From this and noting that the \$9M capital injection into V-Base is recorded as having a cost on rates, it is my assertion that this in turn also indicates that council have not given due consideration to (s.63) as if the funds were to be in accordance with (s.63) this should also be rates neutral.

While I have now heard three separate comments in relation to the main V-Base debt, Debt Transfer/Assuming responsibility for the repayment of the debt and Equity Investment, the only one of these I have found referred to in council papers is  $\hat{a}$ ?oTransfer of Debt $\hat{a}$ ? $\Box$ . While council have advised they did not see s62 or s63 as being relevant I find no mention of this within any council papers from which Councillors could satisfy themselves that this is the case. In fact the V-Base item within the DAP papers was placed post the legal considerations section.

My final point of opposition to this is that any rating amount should be dealt with as a separate  $\hat{a}$ ?otargeted $\hat{a}$ ? rate for the specific purpose to allow full and open transparency. And that as council have advised that the decision to enter into a contract to assume of Management of V-Base was resolved prior to the DAP discussions, I would assume that all councillors who voted in favour of this resolution, those either holding or named to take up directorships, are conflicted in terms of being able to vote on any matters in relation to V-base or funding thereof. I have sought comment from council in respect of this but as at the time of writing have had no response.

This electronic email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed.

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

The views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Christchurch City Council.

27/06/2011



From: ChristchurchCityCouncilOnlineForm@ccc.govt.nz

**Sent:** Sunday, 26 June 2011 8:28 pm

To: 11-12 Annual Plan

Cc: lynchs007@yahoo.co.nz Subject: Draft Annual Plan 2011/12

Are you completing this feedback	For yourself
If you are representing a group or organisation, how many people do you represent?	
My feedback refers to	Summary version
Page no(s)	
Contact name	Mr Lynch
Organisation name (if applicable)	
Organisation role (if applicable	
Contact Address	11 longview place
Postcode	8083
Phone Number (day)	03-3523782
Phone Number (evening)	
Email (if applicable)	lynchs007@yahoo.co.nz
Email Address for Copy of Submission	lynchs007@yahoo.co.nz
Date	26 June 2011
Please be as specific as possible to help us understand your views. What do you want the Council to consider? What specific action do you think the Council should take? Why should this be done? Please refer to the specific page(s) of the draft Annual Plan 2011/12.	Earthquake costs resulting in rate increases.  Regarding additional council costs resulting from the earthquake and rates, many residents of christchurch are under exceptional financial hardship in the same way the council is, especially those in the "Red Zones".  While council does have a rate remission scheme, many impacted residents experiencing significant hardship don't qualify for this. Increasing rates in this current time does not send the right message.  More particularly most ratepayers would probably join with me in the thinking that council should tighten its belt in the current circumstances, so it can concentrate on the earthquake spending to restore the city to its former glory.  Exceptional times call for exceptional measures to rain in costs.  i would like to propose some or all of the following suggestions.  1. Council impose a 10% to 15% unspecified cut to all departments for the forth comming year as a means to fund the deficit. The council can then work diligently toward finding these cuts within its operation and reducing the proposed rate increase.  2. Council instruct CCHL to pay a one off dividend of \$50 to \$75

million to the council for funding the earthquake deficit. This would reduce the impact on rate payers during this exceptional time.

- 3. Council review every special fund it has with regards to the earthquake, and if the purpose of the fund is still relevant in the current environment
- 3. All properties in the "Red zones" be levied at a half rate, till ownership changes hands to the government. This would reflect the hardship on these specific residents untill they vacate there land.
- 4. or a combination of the above.

thank you for consideraing this feedback

This electronic email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed.

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

The views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Christchurch City Council.

If you are not the correct recipient of this email please advise the sender and delete.

27/06/2011

From: ChristchurchCityCouncilOnlineForm@ccc.govt.nz

**Sent:** Sunday, 26 June 2011 8:48 pm

To: 11-12 Annual Plan

Cc: lynchs007@yahoo.co.nz Subject: Draft Annual Plan 2011/12

Are you completing this feedback	For yourself
If you are representing a group or organisation, how many people do you represent?	
My feedback refers to	Full version
Page no(s)	,
Contact name	Mr Lynch
Organisation name (if applicable)	
Organisation role (if applicable	
Contact Address	11 longview Place
Postcode	8083
Phone Number (day)	3523782
Phone Number (evening)	as above
Email (if applicable)	lynchs007@yahoo.co.nz
Email Address for Copy of Submission	lynchs007@yahoo.co.nz
Date	26 June 2011
Please be as specific as possible to help us understand your views. What do you want the Council to consider? What specific action do you think the Council should take? Why should this be done? Please refer to the specific page(s) of the draft Annual Plan 2011/12.	capital valueation for rating purposes.  There are enomalies in the council rating valuation database resulting from no review of capital values.  Properties constructed after 2007 seem to have incorrect valuations applied to them, or there values have been wound back to a 2007 value.  My particular property was added to the rating database in calender year 2010, yet its land value is \$35k below the actual prices paid to the developer. This house improvement valuation is also some \$35k below actual construction costs.  This is the same for the whole street and proberly the whole subdivision.
	Given the government red zone package announcement and the statement of the need to protect owners equity. The Council needs to urgently investigate/ correct and report valuation errors for properties constructed after 2007 in the Red Zone. This needs to be reported to home owners / Government / Cera so home owners are not disadvantaged or financially wiped out as in my case by these inaccurate valuation numbers.

### Council please help and champion this issue!!

This electronic email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed.

\*

The views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Christchurch City Council.

If you are not the correct recipient of this email please advise the sender and delete.

27/06/2011

From:

Wayne and Madeleine Findley [waymad1@xtra.co.nz]

Sent:

Sunday, 26 June 2011 8:57 pm

To:

11-12 Annual Plan

Subject:

Draft Annual Plan - submission from W Findley

Attachments: WEF submission to 2011-12 Draft Annual Plan.pdf

The submission is attached as a PDF.

Name: Wayne Findley

Address: 14c Aston Drive, Waimairi Beach 8083, Green Zone

Please formally acknowledge receipt.

Kind regards, Wayne Findley

### CCC 2011 Draft Annual Plan - Submission of Wayne Findley

### **Summary of Submissions**

- 1. I ask that Development Contributions and associated fees be waived altogether for an extended period: five to ten years.
- 2. I ask that this be applied with immediate effect to subdivisions currently inprocess or proposed.

### Preamble

In a UK context, a 2007 Times article<sup>1</sup> by Lord Rees-Mogg made this assertion about the local, equally grave, housing unaffordability issue for what he termed the '20-20' generation – in their 20's, earning in the 20's salary bracket:

"If one asked a competent graduate of a business school to design a business plan for a national cartel to raise house prices to the maximum, it would have four elements, all of which exist in our present system. It would license housebuilding, so that no one could build a new house without a licence, or even rebuild an old house or a redundant barn. It would encourage developers to maintain large land banks in order to benefit from rising prices. It would leak out new permissions only after long periods of delay. It would combine this with an unlimited flow of mortgage credit and relatively low rates of interest. If you restrict supply below the market clearing level and increase funding, you will inevitably create a bubble and you will lock people out of the market."

These have historically been the precise features of the Christchurch new-home market. Except for Builder licensing, the rest - building inspections and the consequential death of DIY, the obvious land-banking in and around Christchurch, and the interminable consenting processes and their accompanying fees which then incur opportunity or financing costs - are all under direct CCC control.

Council's credibility as an economic actor is on the line here. Its past economic and planning policies have supported land speculators (who operate cost-plus, and simply pass on time=money costs), and banks (via mortgages based on thus-elevated prices). The entire bill for this planning and consent process, if the mess could have charitably been so described, was then foisted on section or lot buyers, as a significant chunk of their mortgages. This was assuredly no way to ensure the 'economic well-being' of the community.

Housing unaffordability in Christchurch is self-inflicted. It is, in Rees-Mogg's terms, a classic housing bubble, which locks people out of the market. This certainly runs counter to Council's Local Government Act 2002 mandate: the economic, social, cultural and environmental wellbeing of its citizens. In the current times, it is clear that the earthquake sequences have crystallized the losses consequent upon the housing property bubble, to households in the red zone now, and will do so for some fraction of the orange zones in future. They are being offered 2007 values – determined at the height of the housing bubble – and will still find that in far too many cases, the payout even at that generous assessment of value, will not start to get them into a replacement house-plus-land package.

<sup>&</sup>lt;sup>1</sup> URL: http://www.timesonline.co.uk/tol/comment/columnists/william\_rees\_mogg/article1657963.ece

And with the current need to relocate thousands of households via new subdivisions, one of the main planks of Development Contribution (DC) justification – that of increased or incremental demand on limited facilities - is surely rendered invalid. After all, the relocation will not add in any way to aggregate demand: it will simply shuffle the sources of that demand to other suburbs.

It is thus economically daft for the Council to be budgeting for any Development Contributions at all.

- The facilities, particularly of infrastructure, lie in various states of ruin where they are available at all. They will be rebuilt from insurance and Central Government funds. Where local funds are needed, they will be a mixture of rates a wide base and loans. There is no need to saddle new subdivisions and hence households and businesses, with the usual imposts.
- There will assuredly be no shortage of reserves for citizens to recreate in 350 ha along the Avon alone from the current Red Zone. Getting this into order will be the immediate task: the reserves expansion is 'baked in the cake' already.
- Incremental demand will take, by my reckoning, a decade or two to become an issue. In the immediate future, relocated, existing demand is the only player.

Simply put, if the Council does not rapidly act to become the most attractive destination for those displaced people and their rebuild funds, there will be plenty of other local authorities with their hand up. Paid-out Red zoners' money is fungible. It is not some CCC-specific token which must be spent within the City urban boundaries (whatever They might be tomorrow...). And as Christchurch is an unaffordable house-and-land package market (in terms of median multiple ratios, at 5 or 6, where a reasonable ratio is south of 3.5), it runs a high risk of inducing its cashed-up casualties to fly the coop, if it seriously expects to continue Business as Usual in its DC revenue line.

The success of Rolleston, Pegasus Town, iZone, and Ashburton, to name just a few of the recent-growth areas, is eloquent testimony to the fungibility of investment capital. Spot the pattern.

Christchurch, in short, has quite some adjustment to reality to accomplish, before it is automatically competitive for the hearts, minds and buy-out dollars of its displaced citizens.

My submission therefore is quite simple.

- 1. I ask that Development Contributions and associated fees be waived altogether for an extended period: five to ten years.
- 2. I ask that this be applied with immediate effect to subdivisions currently inprocess or proposed.

### 1 - Waiver of DCs and other associated fees.

This is intended to address the CCC-controlled impost on new lot prices for households and businesses. While it is reasonable for pure processing costs to be passed on, my preamble (above) should make it quite clear that I regard DC and similar lot fees as being completely unjustifiable for the next five to ten years. If Christchurch is to retain a significant fraction of its cashed-up households, it must compare itself with its peers, and take steps to become competitive. 'Become', for it is assuredly not at present.

Five years is the length of term for CERA. Most commentators and firms also regard this as a reasonable time for completion of the bulk of the immediate reinstatement effort. Ten years, and perhaps there will be the start of growth in absolute numbers, demand and pressure on DC-funded infrastructure. Hence – five to ten years waiver.

I point out (yet again) the mechanism by which front-loaded fees such as DC's, become a surprising multiple from their time of collection, to the time of eventual lot purchase. A worked example follows.

DC's are Revenue to the Council, but Debt to the end consumer - and Debt compounds. All land development is debt-funded because it ties up real cash in DC's, planning fees, consultants, and all this is spent well before the consent issues, and actual construction starts: it is front-loaded, in the jargon. This carries an opportunity cost even if not actually borrowed: because time=money – the cash could have been invested elsewhere, and would have been earning.

Assume a modest DC of \$10,000 per lot as an up-front cost to a developer. Assume a 12% interest rate - and that the lot takes 6 years to sell from the time the contribution was paid over. At that point, via compounding (6 years at 12%, rule of 72), the cost doubles. It has now cost the developer \$20,000. Developers operate cost-plus, so overheads plus a profit margin will be added - say 25% or \$5000.

The original \$10,000 DC revenue item to CCC has now turned into a \$25,000 component of the cost of sale of that single lot. But the home or business lot buyer will fund that purchase via debt or, if cash, an opportunity cost is incurred. So there is more interest, and more compounding. Over the typical life of that loan, as much will be paid for interest as will be repaid as principal. So, the original cost doubles again. That \$10,000 contribution, seen by CCC as Revenue, has cost a single household or business \$50,000 over the life of that loan or foregone investment.

This is the end effect of that single development contribution, so easily pencilled in in a CCC Draft Annual Plan, and as easily spent. It has multiplied by a factor of 5, by the time the end consumer has finished paying.

This economic multiplier can be reduced in three ways:

- 1. Smaller initial impost.
- 2. Shorter conception-to-birth time for the lot. This reduces the compounding effect.
- 3. Lower interest rates.

Clearly, CCC can control the first two via its policies, processes and plans.

I focus only on reducing the impost (point 1). Efficiencies or takeover will see to length of process.

If the DC and associated fee impost were to be zero, it would take a very significant part of the per-lot cost away, and instantly make Christchurch that much more competitive in terms of residential or business lot prices (assuming that developers pass it on. But as land sales work in an open market, developers tune their prices to ensure that they and not a competitor gets the sale. Lessened input costs will assuredly translate to lower prices).

The challenge for CCC is to ensure that these input costs are reduced by the maximum reasonable in our now very much altered circumstances. Reduced to Zero is a good starting-place.

### 2 – Application to existing proposals

Clearly, there is no point, in terms of Christchurch's competitiveness, in applying this waiver only to Future proposals. As extensive media coverage has stated, there are several thousand sections in various stages of the consent marathon right now, accumulating carrying costs.

To provide that instant market effect – of reducing section prices to a competitive level with other authorities, and affordable for relocated buyers – it will be necessary to apply the policy to all existing proposals. There will no doubt be some boundary effects: subdivisions fully consented, just starting construction etc – the question of retrospective refunds must needs be pursued on an individual case-by-case basis, and I do not aim to cover every eventuality here.

But the application to in-process subdivisions and developments, which by definition await their goahead – would be simple: advise of the new, zero impost, and add a condition that this be costed in to section or lot pricing in some transparent fashion (such as by direct disclosure to the prospective buyers).

After all, if an itemised account for a section were to be presented to a purchaser – what would it contain? Another worked example could be instructive. The full costs, then itemized per lot.

Nature of cost	Cost	Accumulated
Purchase cost of original land (20 hectares, then zoned Rural):	200,000	200,000
10 years in land bank while rezoning is eventually recognized, at	200,000	400,000
10% opportunity cost per annum and zero legal/consultant/rates		
Subdivision upfront fees for 200 lots : DC fees per lot \$10,000	2,000,000	2,400,000
Elapsed time – 6 years. Add interest at 12% commercial rate	2,400,000	4,800,000
Construction – say \$50,000 per lot, done over last 2 years	10,000,000	14,800,000
Construction funding interest at 12% (assume equal spread 5 + 6)	1,800,000	16,600,000
Marketing costs at \$10,000 per section (assume last year – 6)	2,000,000	18,600,000
Developer margin 10% on accumulated spend to date	1,860,000	20,460,000
Total raw costs: per lot, and total	102,300	20,460,000
GST at 15%	3,069,000	23,529,000
Purchaser cost: per lot, and total	117,645	23,529,000

So the itemized bill per lot for the purchaser will read:

Land cost	4,000
CCC Fees	20,000
Construction	59,000
Marketing	10,000
Margin	9,300
Tax	15,345
Total	117,645

The CCC impost, front-loaded and subject to interest from day 1, is greater than the developer's margin and marketing costs combined in this simple example.

My submission would remove the CCC line altogether: a saving on the per-lot compounded DC impost price of \$20,000 on a total of \$117,645, or 17%.

Universal application to all existing subdivision proposals in-process, might just be enough to give Christchurch the edge it so desperately needs, and so retain the bulk of its relocated citizens. It would certainly add to the Social, Economic, Cultural and Environmental well-being of those citizens. Which is, after all, what CCC is here for, in the first place.



From: Glenn Boyle [glenn.boyle@canterbury.ac.nz]

Sent: Sunday, 26 June 2011 10:06 pm

To: 11-12 Annual Plan

Subject: Submission P3 of the Summary states:

> "Even with the premium applied, average Christchurch City Council rates will be 22 percent below the average of other New Zealand cities."

This is not only wrong, it's also very misleading.

The 22% figure isn't derived from 'average rates' at all – it refers only to the rates paid by the household living in the average-priced Christchurch house (as compared to the rates paid by the household living in the average-priced house in other centres). Such a comparison is meaningless, because it ignores (i) the rates paid by all households living in houses other than the average-priced house and (ii) variation in the prices – and qualities – of the average-priced house across different cities.

Let me explain. First, focusing on a single household (the owner of the average-priced house) reveals nothing about the overall rates burden – it tells us only about the circumstances of a single household. In determining whether the overall (or even the average) rates burden is higher or lower in Christchurch, one needs to take account of the rates paid by all households, not just one.

Second, the statement above seems clearly designed to give the impression that a given household pays 22% less in rates by living in Chch than it would if it upped sticks and lived somewhere else. But a household wouldn't move from the average house in Chch to the average house in another city – it would move (typically) to a house of comparable price to the one it sold in Chch. So the only valid comparison is with a house of the same value in another centre, not with a house of the same status in the local pecking order.

Taking account of inter-city variation in average house prices can lead to very different conclusions. Residential Rates are a property tax, so one valid way of comparing rates burdens is to compare effective tax rates. The statement on p3 of the Summary implies that Wellington rates, for example, are 35% greater than in Christchurch. Yet when expressed as an effective tax rate, the opposite is true – Wellington rates equate to a 0.35% tax rate on the average house while the corresponding rate in Christchurch is 0.37%.

Statements such as those on p3 of the Summary are sloppy at best, and bordering on dishonest at worst. They have no place in an official CCC document.

Glenn Boyle 167 Wilsons Rd St Martins Chch 8022

\_\_\_\_\_\_

"Nothing is impossible if you don't have to do it yourself"

Glenn Boyle Professor of Finance University of Canterbury Private Bag 4800

ph 64 3 364 3479 027 3333 067 glenn.boyle@canterbury.ac.nz

### Submission

Christchurch 8140
NEW ZEALAND

This email may be confidential and subject to legal privilege, it may not reflect the views of the University of Canterbury, and it is not guaranteed to be virus free. If you are not an intended recipient, please notify the sender immediately and erase all copies of the message and any attachments.

Please refer to http://www.canterbury.ac.nz/emaildisclaimer for more information.

From: Melanda Slemint [mslemint@43below.co.nz]

**Sent:** Sunday, 26 June 2011 10:31 pm

To: 11-12 Annual Plan

Cc: Daly, Jo

Subject: FW: Annual Plan Submission

Submission from Mt Pleasant Residents Association on Draft Annual Plan as follows:

### Changes to capital program

Item ref 4 – new footpaths. We do not support deletion from budget, feel it is especially important in this time without CBD, and without buses on Mt Pleasant, to have footpaths on both sides of all roads where possible and especially on hills, where crossings often have to be made on blind corners to access school or shops.

Item ref 272 – cycleways improvement programme – do not support reduction in budget for similar reasons to above, cycling even more important at the moment with limited recreational opportunities, and important in long term with renewed focus on cycle friendly cbd, which ultimately to be successful must also be accessable by cycle from suburbs.

**Item ref 329 main rd 3 laning** — we ask council to defer this until the ferry rd/main rd masterplan is completed. Furthermore, the urgency has gone because there is less traffic, we have more people who are working from home and fewer people currently living in the badly damaged residential areas of mt pleasant, redcliffs and sumner.

Item ref 351 352 & 353. pedestrian safety initiatives, road safety at schools, and safe routes to schools —thanks for not cutting budgets.

We would like to thank council for supporting ferry rd-main rd masterplan under the suburban centres program, and request further support for masterplanning the badly damaged ferrymead commercial hub.

We also ask that as much support be given to strengthening communities as possible in the badly damaged hagley ferrymead ward. Of particular importance to our Mt Pleasant Community are a temporary gathering hub, and the long term rebuild of our community centre.

Thanks
Melanda Slemint
On behalf of
Mt Pleasant Residents' Association

Christchurch City Council Osl Draft Annual Plan. Zoil to 12. Its Your City: - Have Your Say!

Submitters:

DavidLee and family, supporters, Sparks Rd Garden L+D,

The Lee family,

Landowner in the Henderson Basin,

and other Plus 100s

Address: 288 sparks Rd. Halswell Christchurch

Ph: 021983392

Postal Adress: 288 sparks Rd Halswell Christchurch.

Date. 26-6-2011

Page: - Pagel., Page2, Page3

To be Heard Yes

Christchurch is Living through, an Extremely Large Earthquake Disaster never experence before and may Continue for some time. We are all hurting from stress and financially. Some of us are at breaking points

## 1) Issue you want the Council to Consider:

:- To help us, all rate increases must be. Frozen for 2 years to give us time to rebuild our own Lives.

Upgrade the outfall the Cashmere stream and the Heathote river. To increase storm water flow Capacity That will keep pace with ur ban Developments and stop and reduce stormwater flooding in the Heathcote Catchment.

# what specific action you think the council should take:

Freeze the rate increases for the next 2 years

Remove the Sludges and Liquefaction sands. Remove overgrown Bushes and trees that have grown. Remove the banks that have fallen-in widen stream and Banks where possible.

## Why that should be done.

To reduce the stress and to reduce the financial stress.

The outfall the cashmere stream and the Heathcote is there for a special purpose, it is there to reduce the storm water flooding in the Heathcote Catchment which include the southwest area and area around and along the length of the Cashmerk stream and the Heathcote river. It has very poor stormwater flow rate Capacity Cause by all these restriction. To Avoid a second major Disaster. Cause by stormwater flooding. We must be a town water flooding.

Bob parker has said on t.V. The south west area will sapply a Large number of section for the earth guake rebuild.

Daging big hole in the ground to hold stormwater like the Douglas Clifford Basin at Halswell road is a waste of Land resources. That Could be used for new section. There are other better ways to Control Stormwater like increasing the stormwater flow Capacity in The out fall the Cashmeres stream and the Heathcote river.

The south west area is the highest part of the Heathcote catchment which is 8 to 9 metre, above sea Level and has very little. Land Problems compare with the East side of the City.

### Conclusion

If we work together, have a positive program to solve these stormwater flooding problem it will reduce the possibility of a National Disaster Cause by major restriction that has impede storm water flow Capacity.

Thank You David Lee From: ChristchurchCityCouncilOnlineForm@ccc.govt.nz

**Sent:** Sunday, 26 June 2011 10:38 pm

To: 11-12 Annual Plan
Cc: nchefz@xtra.co.nz

Subject: Draft Annual Plan 2011/12

Are you completing this feedback	For yourself
If you are representing a group or organisation, how many people do you represent?	
My feedback refers to	Summary version
Page no(s)	, 1,3
Contact name	Gary Miller
Organisation name (if applicable)	
Organisation role (if applicable	
Contact Address	22 Ombersley Terrace Opawa
Postcode	8023
Phone Number (day)	0220771650
Phone Number (evening)	
Email (if applicable)	
Email Address for Copy of Submission	nchefz@xtra.co.nz
Date	26 June 2011
Please be as specific as possible to help us understand your views. What do you want the Council to consider? What specific action do you think the Council should take? Why should this be done? Please refer to the specific page(s) of the draft Annual Plan 2011/12.	To whom it may concern.  Please find my comments/submission regarding the CCC DAP for 2011/2012  Pg 3 of the financial overview (attachment ii) - The recommended option for 1.76% EQ Levy over five years is in fact not time bound it is a permanent rate that could be removed after 5yrs if council chose, or could be used for other purposes. Yet on Pg 3 of the DAP Summary signed by Mayor Bob Parker it categorically states that this rate would be imposed for a limited period of 5 years.  Such a rate should be time bound, specific, the funds held separately and any funds not utilised for the intended purpose refunded to ratepayers or put against future rating requirements to reduce levels of increase.  I would ask that point three of the Pros of this recommendation be struck out and it be categorically stated that this levy is for a limited period of 5 years, as per Mayor Parkers statement on the summary of the DAP.  Other considerations: LG Rating ACT stipulates that all other

sources of funding must have been explored before striking a rate, have other sources of funding been explored?

There is no mention of either the Mayoral Fund or Christchurch Earthquake Appeal Trust within the papers to councilors, And given Council are fully aware of both of these funds there should have at least been mention within the overall \$\$ so in my view the EQ Levy does not meet the requirements to strike a rate.

â?¢ Reduced Parking Revenue\*. Parking revenue has been reduced by \$1.265 million to align with actual revenue received over the past two years. And yet within the EQ figures they claim a reduction in parking revenue of \$6.9m, seems that this may not be Quake related at all as it appears parking has been decreasing over the last 2 years and that would also indicate a reduction in enforcement fees.

Therefore a shortfall of \$5m would be more reasonable.

Pg 3 of Summary - When was the decision to take management control of V-Base venues made? Was it made prior to the DAP meeting? Was this within a publicly excluded segment of council meetings? It would appear so.

Given the fact that it has been reported in the media that Mayor Parker, Deputy Mayor Button and Councilor Gough are to become the â?~Newâ?T board of Vbase, along with CCC CEO Tony Marryatt then to ally an perceptions of Conflict of interest they excuse themselves from the voting and any discussion around Vbase and the debt acquisition by the council.

Further, has the entire \$45M debt transfer had legal considerations passed to councilors in relation to sec62 and sec63 of the LGA. Did council see this as relevant? Sec63 clearly states council cannot offer financial accommodation outside of set criteria, where sec62 precludes the offering of guarantees, indemnities etc. Are council assuming responsibility of the repayment of the debt is not a guarantee under sec62, if the council are proposing to "assume responsibility of the repayment of the debt" to me that is an indemnity and very relevant.

I would propose that council loan the monies to Vbase at the best possible rate that they themselves could achieve.

There is also a cost within the financials for interest associated with the \$9M support to V-base, Surely this would be neutral in terms of rates if it were appropriately loaned to V-Base under sec63 of the LGA? As repayments of this amount would not have a rating impact.

Why has the V-base (AMI) \$45M simply been factored into and overall rate rise% and not set as a targeted rate? Is it simply to keep compounding future rates rises on top of this and build reserves... which is not the purpose of rating.

Pg 3 of Summary - I will also add, that the references to other districts (only those with higher % rates) in the "Full description" are in fact unwarranted as they have no bearing as to the CHCH annual plan process, people should not be fed a line to try and dissuade them in a consultation notification on the CCC website, if this was balanced then there should also be reference to other authorities who actually have lower levels.

Sincerely Gary Miller

This electronic email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are

\*

 $\textbf{From:} \hspace{0.5cm} \textbf{ChristchurchCityCouncilOnlineForm@ccc.govt.nz} \\$ 

**Sent:** Sunday, 26 June 2011 10:43 pm

To: 11-12 Annual Plan

Cc: a.gough@herefordholdings.co.nz

Subject: Draft Annual Plan 2011/12

Are you completing this feedback	On behalf of a group or organisation
If you are representing a group or organisation, how many people do you represent?	
My feedback refers to	Summary version
Page no(s)	,
Contact name	Antony Gough - Chairman CCBA
Organisation name (if applicable)	Central City Bussiness Association (CCBA)
Organisation role (if applicable	To represent, cordinate and promote the Central City of Christchurch
Contact Address	30 Heaton Street Christchurch
Postcode	8052
Phone Number (day)	03 355 6855
Phone Number (evening)	03 355 6855
Email (if applicable)	a.gough@herefordholdings.co.nz
Email Address for Copy of Submission	a.gough@herefordholdings.co.nz
Date	26 June 2011
Please be as specific as possible to help us understand your views. What do you want the Council to consider? What specific action do you think the Council should take? Why should this be done? Please refer to the specific page(s) of the draft Annual Plan 2011/12.	1. Rates for 2011/2012.  We are realistic and support the 5.3% increase in rates for this year.  2. Earthquake levy.  We do not support the 1.76% increase in rates for five years to fund the short fall in revenue the council expects for the next five years.  We believe that this should be funded by a levy of \$106 per rate payer over the next five years.  The reason for this is that a percentage rates levy falls more heavily on the central businees area because its capital values are substantially higher than the average residential property and the central city is likely to loose 80% of its floor area and so will not have the income to pay a higher percentage of this shortfall. The loss of income and earthquake problems affect the city as a whole and so should be spread more evenly over the whole city rather than putting a substantial part of this special levy on the business sector that will have substantial areas with no buildings or income for many years ahead. The worst affected areas for council repairs are in the eastern suburbs and the decimated central city should not be asked to bear the brunt of these costs. An even levy of \$106 per ratepayer is a fairer way to fund this short fall.  3. Funding for the Central City Business Association.  \$150,000 was put aside for two years last year for funding this organisation. It was to be reviewed at this time after the first year to

ensure the city was getting value from this funding. The CCBA only employs one person, Paul Lonsdale the CCBA manager, and all other people give their time at no charge to the CCBA. This orgainsation was vital in communicating with Central City Businesses during this total upheaval after the earthquakes. It works closely with all council staff for the betterment of the central city and in the past had run the daytime City Ambassador program seven days a week from this funding. We anticipate we will need to do this again once the CBD opens as well as doing major promotions to assist the central city that has been closed down for many months now. We are in very dangerous times with no CBD or active heart to Christchurch. We all will need a functioning organisation to be the link between Council, CERA and businesses as the city reopens. Without this funding the CCBA will have to cease and this is not the time for us to allow this to happen. It is critical that this \$150,000 is continued to assist the re-establishment of the CBD as it reopens and brings retailers, businesses and shoppers back to Central Christchurch.

4. Balance of 2011/2012 Draft Annual Plan. The CCBA supports the balance of the 2011/2012 Draft Annual Plan for the Christchurch City Council.

Antony Gough - Chairman CCBA.

This electronic email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed.

\*

The views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Christchurch City Council.

If you are not the correct recipient of this email please advise the sender and delete.

27/06/2011



### CCC110626 AP submission

### Submission on the CCC Draft Annual Plan 2011-12 from David Close

### 1.0 Introduction

- 1.1 I wish to acknowledge that the City Council has never before had to prepare a budget or annual plan in such difficult circumstances. The earthquakes have created an unprecedented demand for expenditure coincident with a sudden drop in revenue. Moreover, planning is based on fairly speculative assumptions.
- 1.2 I am pleased that, despite the circumstances, the Council decided to allow a period for submissions from the public. However, as a result of considerable personal inconvenience caused by the June 13<sup>th</sup> quake, I have had very limited time to scrutinise the documents provided by the Council for the Annual Plan process.
- 1.3 This submission is personal; it is not made on behalf of or in association with any organization.

### 2.0 The need for honest recognition of the costs of the earthquakes

- 2.1 The city has suffered huge losses from the quakes. A large proportion of the cost to residents, business and the Council will be covered by insurance, but there will be a significant residual cost. The Council in its Annual Plan appears to estimate the residual cost to be an additional \$81 a year for five years for the median ratepayer \$1.56 a week, not enough to buy a cup of coffee or an ice cream, and barely enough for a loaf of bread on special. <sup>1</sup>
- 2.2 This outcome is counter-intuitive. It will be regarded with incredulity by other cities and could lose Christchurch the sympathy which has been generously given us by the rest of New Zealand.
- 2.3 In the Summary of the Draft Annual Plan a statement attributed to the Mayor claims that it is "prudent" to borrow "to cover the costs of the earthquake". There are some problems with this statement. The first is that the deficit is not caused by the "costs" of the earthquake, but by the reduction in revenue from parking and dividends. The second is that the \$27.2m of borrowing to which the Mayor's statement refers is only part of \$111.6m the Council is proposing to borrow. The ratepayer should be told quite clearly that, in addition to the \$81 extra he is paying rates, the Council will be borrowing about \$800 on his behalf.

### 3.0 The ironies of the Parks Budget

<sup>&</sup>lt;sup>1</sup> My initial assumption was that the increase of 1.76% was one-off. Later calculations showed it to be cumulative. See 6.3 below.

3.1 Considerable damage was done to parks, but the rates levied for parks is \$7.2m less than last year, mainly because borrowing increases by \$12.7m.

### 4.0 The ironies of the Streets Budget

- 4.1 In Streets and Transport rates contributed \$67.4m to **operational costs** last year. This year the entire operational cost of \$108.7m is met from non-rating sources: earthquake cost recoveries, subsidies and fees and charges.
- 4.2 Last year rates contributed \$43m to capital costs. This falls to \$15.7m in this year's plan, whilst borrowing doubles from \$17.7m to \$34.2m.
- 4.3 To summarise, spending on roads from rates will be \$15.7m compared with \$110m last year. Earthquake costs are not putting rates up; earthquake recoveries are bringing rates down, and additional borrowing is bringing rates down further still. With earthquake recoveries of \$167.7m, and the rates contribution to streets lower than it has been for decades, it is hard to see the logic for increased borrowing in this budget.

### 5.0 Refuse, waste water, water supply

5.1 These budgets follow a generally similar pattern of reduced spending from rates, and increased borrowing, compared with last year. (See Attachment, Table 1, for a summary of the source of funds of the major budgets.)

### 6.0 Conclusions

- 6.1 As explained above, I have not had sufficient time to analyse the draft plan in detail, nor do I have all the documents necessary for such an analysis. In particular, I have not seen any forward projections, though such documents may exist somewhere on the website. The reserve fund, mentioned in the text but which I have not seen in the figures, may make some difference to my calculations. Nevertheless I conclude that:
  - (i) costs resulting from the earthquake have not put pressure on rates in the major budgets because the increased costs are more than covered by earthquake recoveries
  - (ii) the operating deficit results not from increased costs but from reduced revenue
  - (iii) rates contributions to capital spending have been reduced to an unprecedented level, and borrowing increased
  - (iv) the artificially low contribution of rates to major activities in the draft plan creates a risk in future years of an unsustainable operating deficit, or unsustainable borrowing, or excessively large rate increases.
- 6.2 It is imprudent to borrow for an operational deficit in the hope that it will be eliminated in three years. As the Mayor's statement says, significant costs lie ahead and the extent of those costs is uncertain. It is much better to be honest with the public and tackle the operating deficit before it gets out of control.

- 6.3 The document "Financial Strategy for Earthquake Costs" is not clear. If a surcharge of 1.76% is to raise \$81.7m over five years, I assume that the surcharge is cumulative, that is, 1.76% in Year 1, 3.52% in Year 2, and so on, rising to 8.8% in Year 5. I do not think the public will have grasped that. That will result in double-digit increases when other costs are added on.
- 6.4 It would be more prudent, and more acceptable to the public, to bite the bullet now. A significant one-off increase of, say, 11% (5.32 + 5.68) would deal with the deficit quickly, avoid significant interest costs, allow for modest increases in the future, and avoid dragging out the pain.
- 6.5 It will also be necessary to curb borrowing for capital expenditure because every \$100m borrowed will result in a rate increase of about 2.5%. The Council is not heavily indebted at present, but, if the current pattern of borrowing persists, that will change within a few years.

David Close

388.0151

8 Seafield Place, South Brighton, Christchurch 8062.

david.close@xtra.co.nz

26 June 2011.

CCC110627 AP submission

Table 1 Sources of funding - major budgets 2010-11 and 2011-12

	Opex funder	d by rates	Capex funder	d by rates	Capex funde	Capex funded by borrowing
	2010-11 2	011-12	2010-11 20	11-12	2010-11 20	11-12
Parks	38.5	37.5	12.1	4.6	12.7	24.99
Refuse	31.33	30.9	0.31	0.81	0.74	7.13
Streets and transport	67.36 -0.39	-0.39	43.1 15.7	15.7	17.7	34.2
Waste water		-102.8	7.65	4.68	41.6	18.8
Water	18.4	7.6	9.5	1.8	1.35	5.43
Total \$m	182.79	-27.19	72.36	27.59	74.09	90.55

# SUBMISSION

FEDERATED FARMERS

TELEPHONE 0800 327 646 I WEBSITE WWW.FEDFARM.ORG.NZ

To:

Christchurch City Council

Submission on:

Draft Annual Plan 2011/12

Date:

27 June 2011

Contact:

**ANNA MACKENZIE** 

POLICY ADVISOR

Federated Farmers of New Zealand PO Box 1992, Christchurch, New Zealand

P 03 357 9452 M 027 551 1629 F 03 357 9451

E amackenzie@fedfarm.org.nz

SUBMISSION TO CHRISTCHURCH CITY COUNCIL ON THE DRAFT ANNUAL PLAN 2011/12

## 1. Key Submissions

Federated Farmers congratulates Christchurch City Council for its response to the Earthquake, and offers support through the years of rebuilding effort ahead.

Federated Farmers acknowledges the need to borrow to fund the 2010/11 deficit, but cautions against borrowing for operating expenditure in the future.

Federated Farmers is keen to be involved in any funding policy review or stakeholder discussion group regarding the future of Christchurch.

Federated Farmers supports option (a) Earthquake levy of \$106 per ratepayer for five years, to fund the recovery costs of the Earthquake, as the most efficient and equitable means of funding Earthquake recovery costs.

As a second preferred option, our Christchurch members support option (f) Rates increase 'premium' of 1% for ten years plus \$100 earthquake levy for 10 years.

#### 2. General Comments

Federated Farmers congratulates Christchurch City Council for its response to the Earthquake, and offers support through the years of rebuilding effort ahead.

This submission recognises that "business as usual" is not an option for the City, it's Council, or it's residents. The rebuild is likely to be an adaptive process, and the Annual Plan process and the plan's proposals for the years ahead need to reflect the new reality Christchurch finds itself in, needing to adapt as planning, progress and myriad other factors unfold.

In this light, funding policy may appear to be of secondary importance in comparison to "just getting on with it". Federated Farmers and our Christchurch members consider it is nonetheless important to ensure that all aspects of the rebuild, including the method in which the rates portion of the rebuild costs are funded, are implemented as well as possible.

Federated Farmers acknowledges there is significant uncertainty, urgency and fluidity to Council's recovery work, and a need to reflect the community's current state of disarray. We therefore acknowledge the decision to borrow to fund the 2010/11 deficit as a reasonable response given the circumstances.

Our members are concerned at the precedent that borrowing to fund operating expenditure may set. Federated Farmers supports prudent use of debt to fund the costs of Capital expenditure over the useful life of an asset to ensure that the ratepayers of today do not shoulder the total cost of capital expenditure. However, for operating expenditure it is not (as a rule) appropriate to cover the cost through borrowing rather than shouldering the cost at the time. Therefore we submit that capital expenditure should be loan funded in significant part from loans, operating expenditure through current funds.

We note Councils accumulated operating surpluses of \$23.8 million since 2006/07, of which \$20.8 million was applied to reducing Council debt. Our members congratulate Council for this foresight and are expectant similar plans will be put in place in the future to reduce the overall financial impact of debt

associated with the 2010/11 deficit, and to ensure that any "out of the ordinary" borrowing (particularly for operating expenditure) is for this year only.

Federated Farmers is keen to be involved in any funding policy review or stakeholder discussion group regarding the future of Christchurch, over 2011/12.

## 3. Earthquake recovery rate

Funding for costs associated with the Earthquakes should aim to encourage maximum possible growth for the city, in a manner that is equitable, and impacts as little as possible on the City's residents. Therefore Federated Farmers supports a Uniform Charge levy for the funding of the Earthquake recovery, and opposes the funding of costs associated with Earthquake recovery through a property value based rate for the reasons outlined below.

<u>Distribution of benefits of the rebuild in general</u> – S101 (3) (a) (ii) of the Local Government Act 2002 requires councils to consider, among other factors, "the distribution of benefits between the community as a whole, any identifiable part of the community, and individuals". Federated Farmers considers the significant majority of the costs associated with the rebuild to be of benefit to the Christchurch community as a whole, to this end a flat per property charge is the correct funding tool to reflect relative benefit. Rebuilding from the earthquake is a community activity.

<u>Nature of the activities funded</u> – As above, the nature of the costs to be recovered offer significant community benefit. A Uniform Charge is an appropriate funding tool for these activities; a property value based rate is not.

Broad based, low rate — Christchurch will also be relying on those with relatively higher property values to assist relatively more in the rebuild, for instance commercial operations, industry and farms will all provide the basis for Canterbury's economic recovery, and the ability to retain residents relies on those residents being able to find good, long term employment. A property value based rate in no way recognises the importance of Christchurch's major employers to the rebuild. A broad based, low rate levy for Earthquake costs approach is warranted.

Higher property values already pay their fair share — Of Council's \$330,353,000 forecast rates take for the year 2011/12, 87.5 percent is reliant on (differentiated) property value as a basis (the General rate, Water supply targeted rate, Land drainage targeted rate and Sewerage targeted rate). Of these, the General rate itself comprises 62 percent of the total rates take. The substantial portion of Christchurch's current funding policy is already reliant on property value as a basis, with those with relatively higher property values already paying more than their fair share of the City's rates.

Higher property values will shoulder the cost of a reduced ratepayer base -, As indicated on page 1 of the supporting document, *Financial Strategy for Earthquake costs* (page 1), "the earthquake is also expected to impact negatively on the growth of the rating base, which has the consequential impact of increasing the rates required from the existing ratepayers". As outlined above, the impact of the reduced rating base will be felt significantly more by those with relatively higher property values, given Council's reliance on property value based rates, as Council will not be able to reduce expenditure at the same rate as loss of revenue due to departing residents.

Percentage Rates increases not felt equally – Indicative increases of the property value based options do not tell the total picture of the effects of these increases. For a ratepayer paying \$1,550 in rates, a ten percent increase represents a nominal increase of \$155. For a ratepayer paying \$6,000 in rates, the percentage increase of 10 percent represents a nominal increase of \$600. Options which encourage a percentage increase impact in a significantly different manner than a flat per property charge.

<u>Property value as ability to pay</u> – Federated Farmers strongly disputes the assumption that the property value basis for rating correlates sufficiently with the ratepayer's ability to pay. In Christchurch, this correlation is even more tenuous, given the significant possibility of disruption to earnings and income. Many ratepayers with relatively higher property values will be facing having to pay debt on those properties, with a disrupted income stream. Given these factors, Council cannot with any confidence claim that the use of a property value based levy would sufficiently capture a ratepayer's relative ability to pay, it would only capture the relative cost of that rateable property. It is important Councillors recognise these as two very distinct measures. In this instance a Uniform Charge cannot be assumed to be regressive.

Rates rebate scheme and rates remissions – Federated Farmers supports the use of rates remissions for those most affected in the City, as a means of targeting assistance to those with the greatest need. We also support Central Government's Rates Rebate scheme, which targets a ratepayer's genuine ability to pay, not through the blunt assumption of property value based rating, but through an assessment of that ratepayer's income, in conjunction with the amount of rates to be paid. Given the ability to directly target the ratepayer's ability to pay, the Rates rebate scheme is the appropriate method of dealing with any concerns over the regressive nature of a Uniform Charge, not funding policy.

<u>Flat charges regarded as equitable</u> – Both Waimakariri District Council and Selwyn District Council have recognised the equity in funding Earthquake recovery costs through a Uniform Charge; in the two council's respective 2011/12 draft Annual Plans.

Given these factors, Federated Farmers supports option (a) Earthquake levy of \$106 per ratepayer for five years, to fund the recovery costs of the Earthquake, as the most efficient and equitable means of funding Earthquake recovery costs. Our members consider that it is entirely appropriate to fund the earthquake recovery rate on a uniform basis across the entire City, for reasons outlined below. As a second preferred option, our Christchurch members support option (f) Rates increase 'premium' of 1% for ten years plus \$100 earthquake levy for 10 years.

#### 4. About Federated Farmers

Federated Farmers welcomes the opportunity to comment on the Christchurch City Council's 2011/12 draft Annual Plan.

<sup>&</sup>lt;sup>1</sup> While the 2007 Rates Inquiry outlined a correlation between *residential* property values and relative ability to pay, it did not have sufficient data to conclude that this correlation held across ratepayer categories. The correlation does not hold across ratepayer categories, particularly in the case of farming with a reliance on land as the major capital input and a relatively low return on assets.

Federated Farmers of New Zealand is a voluntary, member-based organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.

The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

From:

Christchurch City Council Online Form@ccc.govt.nz

Sent:

Monday, 27 June 2011 9:49 am

To:

11-12 Annual Plan

Cc:

maryc@dop.co.nz

Subject: Draft Annual Plan 2011/12

Are you completing this feedback	On behalf of a group or organisation
If you are representing a group or organisation, how many people do you represent?	
My feedback refers to	Full version
Page no(s)	
Contact name	Highfield Park
Organisation name (if applicable)	
Organisation role (if applicable	
Contact Address	C/O - Davis Ogilvie, PO Box 589 Christchurch
Postcode	
Phone Number (day)	033661653
Phone Number (evening)	
Email (if applicable)	maryc@dop.co.nz
Email Address for Copy of Submission	maryc@dop.co.nz
Date	27 June 2011
Please be as specific as possible to help us understand your views. What do you want the Council to consider? What specific action do you think the Council should take? Why should this be done? Please refer to the specific page(s) of the draft Annual Plan 2011/12.	File No 28914  24 June 2011  SUBMISSION TO THE CHRISTCHURCH CITY COUNCIL ANNUAL PLAN 2011/12  â?~Highfield Parkâ?T represents a group of landowners who own the land within the block contained within Hill and Hawkins Road to the east, QEII Drive to the south, the Styx River to the north and the suburb of Redwood to the West.  The land in question was included within the RPS PC1 Urban limits via the Commissioners Decision on PC1, and hence was deemed suitable for a large scale residential development.  The Group are now seeking to rapidly progress their plans to develop the block for residential purposes in order to assist the Council to meet the increased demand for sound residential land

supply as a result of the Canterbury Earthquakes of September, February and June. The Group considers that the Mills/Hills Block will be able to provide the sort of quality living environment that displaced residents deserve, in a location that is well located to benefit from easy access to commercial areas, the central city, and the damaged eastern suburbs.

A private plan change is currently being prepared to allow the development of the land. It is expected that this application will be submitted to the Council shortly. The development will involve the rejuvenation of Horners Drain, which currently runs through the site, a mix of residential densities and some small scale commercially zoned areas to allow for the integration of community facilities and services to be provided in the newly zoned land.

A detailed analysis of the requirements for the servicing of the land is currently underway and this servicing strategy will inform the plan change process. Provision must be made in the Annual Plan to cater for the Councilâ?Ts share of the upgrading required to develop this land. Provision within the Cityâ?Ts Annual Plan should consider the inclusion of the development of the land when considering budgets for:

â?¢ Upgrading of sewer and stormwater networks, both adjoining the site and further afield, to allow the site to have an unfettered ability to be developed

â?¢ Provision of recreation infrastructure and the ongoing costs associated with this

â?¢ Consideration of the proposed development area in determining the development potential of land within the Cranford Basin â?¢ Provision of a public transport route through the site, and the associated infrastructure related to this

â?¢ Upgrading of local roading infrastructure to support the establishment of the Northern Arterial Motorway corridor to be constructed along the western boundary of the site. This includes the four laning of critical roads as identified in the NROSS report.

The Council, when determining this years Annual Plan, must allow for the rapid development of Highfield Park and ensure that the Annual Plan provisions cater for the level of growth predicted to occur in the Mills/Hills area, to be known as Highfield Park.

It is considered, that given the importance of this site for the rebuild of Christchurch, that ongoing research should be undertaken into the servicing of the site, and that flexibility and contingency is built into the Annual Plan to allow for the development of this site to occur in an efficient manner.

This electronic email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed.

\*

The views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Christchurch City Council.

If you are not the correct recipient of this email please advise the sender and delete.

Christchurch City Council http://www.ccc.govt.nz

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

ADDITIONAL SUBMISSIONS RECEIVED





Friday, 24 June 2011

RE: CCC ANNUAL PLAN 2010-11

#### SUBMISSION FROM SPOKES CANTERBURY

Thank you for the opportunity to make this submission. Spokes Canterbury is a cycling advocacy group with approximately 1,500 members that is affiliated with the national Cycling Advocates Network (CAN). Spokes is dedicated to including cycling as an everyday form of transport in the greater Christchurch area.

We would like the opportunity to appear at any hearing that is held to consider submissions on this draft annual Plan. Should there be an officer's report or similar document(s) we would appreciate a copy(s).

## Our submission is

**Cycling conditions were poor over much of Christchurch prior to the earthquakes, and have deteriorated since**. This is due to a history of inadequate funding for cycle infrastructure, the effect of the earthquakes quakes on roads, paths and other cycling infrastructure, and post-quake activity including road closures, removal of cycle lanes, construction works, and impacts from parking, lack of enforcement, and traffic.

Despite the effects of the earthquakes large numbers of people are still cycling, or would like to cycle. Health and fitness considerations and a desire to adopt a more sustainable mode of transport are important drivers for taking up cycling. However, there has been as additional impetus post-quake from congested roads, high fuel prices, and a desire by people to "do their bit" to address congestion and aid the recovery. While figures are not available for current cycling numbers, anecdotal evidence and a recent ECAN survey<sup>1</sup> indicate that these have held up well when compared with public transport use, which has fallen by up to 40%.

There has been a clear desire expressed through the Share an Idea and Central City Plan processes for enhancing cycling in Christchurch. There is strong public support for:

- A rebuilt central city cycling that is cycling friendly;
- Provision of separated cycle ways, cycle boulevards and paths;
- A fully integrated city wide cycle network, and
- Traffic management and street layouts that create a safer and more pleasant cycling and walking environment.

<sup>&</sup>lt;sup>1</sup> Metro System Audit May 2011



These aspirations were also strongly supported through the outcomes of all the CCC Central City Plan Transport Workshops held in late May and early June.

Post-quake cycling levels and the outcomes of the Share an Idea process indicate that the proposed reduction to the active transport target in Appendix 5(a) of the plan is inappropriate. The target is based on a figure which was already overly pessimistic about cycling's potential in

terms of total trips, and that did not reflect the targets in the Regional Land Transport Strategy. The 2006 Census Journey to Work mode share for cycling was over 6% of work trips, which exceeded those undertaken using public transport (approximately 5%). This gap may have widened post-quake given the fall in public transport use, and the potential for some of these users to have switched to cycling. Given the post-quake disruption and uncertainty around public transport services and shifts in employment and retailing, cycling is often the only transport alternative to cars for many people. Despite this, public transport continues to attract a disproportionate share of Annual Plan funding when compared with cycling.

Action to give effect to the Share an Idea process aspirations for cycling improvements should not be delayed until the central city is rebuilt. In fact it cannot wait if the clear preference arising from that process for an integrated network serving the central city and suburbs is to be implemented. Infrastructure improvements such as separated cycleways on major routes (including along the four avenues and to the University) could be commenced almost immediately. In most instances they could also be incorporated during the rebuild of earthquake damaged roads. Separated cycleways can be built relatively inexpensively, and often do not require complex design and engineering - an example of a simple, low cost design for a separated cycleway from Melbourne is attached. In addition, a number of proposed cycling improvement projects have been mooted over the years (such as railway cycle paths, utilisation of the Avon and Heathcote river corridors and the estuary edge, and the proposed City to Sumner route) that are entirely consistent with public aspirations expressed through the Share an Idea process. Planning, design and implementation of these cycleway projects prior to, and during the central city rebuild would mean that improved cycling links would be in place once the central city has re-opened.

The recommendation in the draft annual plan that the Cycleways Improvement Programme budget (272) be cut by 87% from \$574,000 to \$75,000 is entirely inconsistent with need to repair and improve cycling facilities in Christchurch. It also flies in the face of public aspirations for improved cycling infrastructure that have been clearly expressed through the Share an Idea process. Rather than being cut, cycling expenditure needs to be substantially increased so that the City is able to begin implementing the necessary cycling facilities to meet these aspirations. For Council to reduce funding to the recommended level would be a clear signal that it intends to ignore the overwhelming and clearly expressed public preference for a significant level of improvement to cycling infrastructure.

No provision appears to have been made under the capital or operational programmes for Travel Demand Management (TDM) to address traffic congestion. Significant changes have occurred in both residency and work location as a result of the earthquakes and these are reflected in changed transport patterns and levels of traffic congestions. It is therefore surprising that there has been virtually no emphasis post- quake on TDM, and in particular on implementation of travel plans around major employment centres. To address traffic congestion, greater emphasis should be

placed on reducing the number of single occupancy vehicles on the roads, and encouraging commuters to use alternative modes such as public transport, cycling, or ride-sharing. Additional funding should be incorporated in the Annual Plan to provide for a meaningful level of TDM and travel planning to address traffic congestion problems in Christchurch. A TDM strategy for the central city could also assist in returning businesses to the CBD, and must be a vital part of the rebuild planning and implementation.

#### **Decisions sought**

- 1. Retain the LTP 2011/12 budget figure of \$574,000 in the Cycleways Improvement Programme.
- 2. Include a new budget line item for the design and implementation of separated cycle ways and other facilities that aid and encourage cycling, with an appropriate level of funding.
- 3. Include a new budget line item to provide for a meaningful level of TDM and travel planning to address travel congestion in Christchurch.
- 4. Increase the target for active transport as a percentage of total trips in Appendix 5(a) in the annual plan to 3%.

If you require further information or there are matters requiring clarification, please contact our Policy and Strategy Convenor Dirk De Lu in the first instance. His contact details are:

38 Thorrington Road Cashmere, Christchurch 8140

Phone: 337 1790

Email: dirk4@paradise.net.nz

**Keith Turner** 

Chairperson, Spokes Canterbury

Attachment: Examples of inexpensive separated cycle lane approaches from Melbourne





# CCC ANNUAL PLAN 2011-2012 SUBMISSION BY BECKENHAM NEIGHBOURHOOD ASSOCIATION INCORPORATED

## INTRODUCTION

- 1 The BNA deeply appreciates the fact that, despite the extraordinary difficulties created by the ongoing seismic disaster, the City Council has nevertheless afforded the public an opportunity to comment on this year's Draft Annual Plan.
- The most recent major aftershocks and their further impact on the fabric of our city and its infrastructure may already have had the effect of rendering the estimates contained in the draft plan out of date through further necessary costs and further diminished rate revenue. Nevertheless, some kind of plan has to be put together, however susceptible it may be to being further overtaken by seismic events, and we address the present draft with that understanding in mind.
- A further general consideration underlying this submission is that, precisely because of the seismic impact on the rich cultural, social and environmental amenities that in the past have contributed to Christchurch being such a pleasant place to live, it is vital that the Council seek to make living here as attractive as possible in the circumstances, in order to stem the outflow of residents in what may be termed a "Cantabrian Diaspora". This has implications for service levels. If Christchurch is to remain attractive as a place to live, then it is essential to maintain and build a ratepayer base that can enable proper funding of the amenities that are essential to making it so. While ultimately we must look to attract new residents to the city, the first step must be to minimize any migration from the city in the short term; any scaling back of levels of service will be counterproductive to achieving this objective.

## OPTIONS FOR FUNDING DEFICITS

- A No ratepayers can be expected to welcome rate increases; however, we recognize that their necessity in the present circumstances has to be accepted in principle, and options assessed in terms of how close they are seen to come to making the best of a bad situation. Support should not be mistaken for enthusiasm.
- In that spirit, we support preference for option (e), for the reasons set out in the draft plan:

(e) Rates increase 'premium' of 1.76% for five years to recover operating
deficits over five years. This option raises \$81.7 million in revenue over five
years and covers the repayment of the operating deficits plus \$7.8 million in
interest costs incurred.
Pros:
☐ Simple to understand and levies the same percentage increase on all
ratepayers.
☐ Repays three years of operating deficits plus interest costs in five years.
☐ Increases the rates base permanently which then allows Council to decide
after five years to decrease rates, increase debt repayments or increase
capital spending on renewals or other projects.
$\hfill\Box$ The premium is progressive in its incidence – it results in a higher cost to a
higher capital value asset in a similar way to the general rate.



- 5 However, in our view the time limit of 5 years should be strictly adhered to, and in the absence of compelling reasons we will oppose any proposal in future annual plans to extend the imposition of this premium beyond the 5-year limit.
- Option (c), funding each year's current deficit with long-term debt, might be considered to have a certain immediate appeal, but would conflict with the principle of intergenerational equity (namely that long-term borrowing should be used to fund long-term major capital projects that will benefit future ratepayers who will be servicing the debt), which we understand to be one of the core principles of the council's current borrowing policy.
- As regards Option (g), covering deficits by reducing service levels: in addition to the excellent counter-arguments presented by staff, the viewpoint set out in para.3 above leads us to be absolutely opposed to this. While we recognize that the present situation is bound to have an impact on levels of service, drastic reductions on the scale required to cover the anticipated deficits would in our view be nothing short of catastrophic.

## **RATES REMISSIONS**

- 8 We support the proposal to seek an Order in Council allowing the City Council to reduce the rates on a demolished building with effect from the date of demolition rather than base the assessment on its value as at the previous 31 July.
- We also support extension of the current earthquake-related rates remissions policy (Option 1).

Amount	Criteria				
	on of Current Policy tial & Other Unable to be occupied	\$0.478	\$0,000	\$0.000	\$0.478
Busines	5.	*		,	*
30% 30%	Unsafe Unsafe due to adjacent property	\$0.775 included above	\$0.520	\$0.310	\$1.605
30%	Within Cordon	\$1.159	\$0.580	\$0.232	\$1.971
		\$2.412	\$1.100	\$0.542	\$4.054

# CHANGES IN SERVICE LEVELS

- 9 As indicated above, we recognize that the post-earthquake situation has inevitable implications for levels of service. However, we have concerns under this heading as indicated below.
- Service Centres: Although we note the absence of any proposals to close service centres or to reduce their number, we wish to state for the record that we will vigorously oppose any such proposals should they ever be considered. The present situation in our view makes it all the more important for the Council to maintain, and if possible increase, the number of points of face-to-face contact with the public.

- South West Area Plan: Rather than a change in frequency of reporting on implementation of the SWAP, we are of the view that present circumstances make it more appropriate to suspend implementation of the SWAP altogether pending a fundamental review of the plan in the light of the impact of earthquakes on the assumptions (especially the demographic assumptions) on which it is based, and of the implications that planning for the re-development of Christchurch as a whole may have for the future of the SWAP.
- Strengthening Communities: We are particularly concerned at the sharp reduction in the levels of activity under this heading (facilitation of community networking forums reduced from 110 to 25; facilitation of engagement projects reduced from 15,600 hours to 13,650 hours). Given the ongoing impact on communities throughout the city (especially in those hardest hit by the impact of earthquakes), Strengthening Communities is surely an area calling for more activity rather than less. We make this plea principally on behalf of communities in parts of the city that have been immeasurably worse affected by seismic disaster than our own.
- 13 **Heritage Protection:** We are concerned to see that activities under this heading are proposed for suspension or re-evaluation, and hope that it will be found possible to retain the original target.
- Neighbourhood Library Opening Hours: The recent increase that we have observed in the usage of Christchurch South Library leads us to the thought that for many residents local libraries may be making a more greatly valued contribution than hitherto to the quality of life in the circumstances currently besetting Christchurch. We therefore question the desirability of the proposed reduction in minimum library opening hours from 43 to 36.

#### HEATHCOTE RIVER LINEAR PARK PROJECT

- 15 This is the one local matter on which we feel bound to make a plea for local capital spending.
- Prior to 4 September 2010, this proposed project represented an item of additional capital expenditure.
- We would argue that the seismic events of and subsequent to 4 September 2010, especially the 22 February and subsequent quakes, and the resulting damage to riverside roads and to riverbanks, mean that the Linear Park Project could, and in our view should, be incorporated into the carrying out of work that now needs to be done in any case, namely the reinstatement of damaged roads and banks. We therefore ask the Council to treat this project not as a dispensable extra but as part of a task rendered necessary by earthquake damage.

## IN CONCLUSION

- We recognize the enormous challenges confronting staff and Council members at this time, and would reiterate our appreciation of the opportunity to comment on this year's Draft Annual Plan.
- 19 Given the extraordinary current and future circumstances, we also recognize that unforeseen events may well have an impact on the assumptions on which the plan has been based and that in

consequence *force majeure* may compel the Council to depart from or even to abandon some of the intentions expressed in the plan. Equally, unforeseen opportunities may arise to do more than the plan envisages, and we hope that such opportunities will be grasped. In either case, with the proviso that emergencies should not be used as a pretext for diminishing local democracy, we would like to assure the Council that, even where we may see cause for criticism, our underlying intention will be to contribute constructively to the affairs of our community and our City.

Beckenham Neighbourhood Association Incorporated

Direct Contact:

Peter Tuffley (Chairperson)

114 Birdwood Avenue

Beckenham

**CHRISTCHURCH 8023** 

Tel 332-7951

021-0123-2134

Email <a href="mailto:ptuffley@xtra.co.nz">ptuffley@xtra.co.nz</a> OR <a href="mailto:peter.tuffley@gmail.com">peter.tuffley@gmail.com</a>

# SUBMISSION ON CHRISTCHURCH CITY COUNCIL DRAFT ANNUAL PLAN 2011/2012 24 June 2011

**Duncan Cotterill**Solicitor acting: Hans van der Wal
PO Box 5, Christchurch

Phone +64 3 379 2430 Fax +64 3 379 7097 h.vanderwal@duncancotterill.com



## To: Christchurch City Council

- This submission is made on behalf of the Fairhaven Trust, which owns a property at 149 Claridges Road, Harewood (Lot 2 DP 51202) (the Property), which is liable for Council rates.
- This submission addresses the circumstances in which the rural rate differential is to be applied, as proposed in the Funding Impact Statement and Rating Policy section of the Draft Annual Plan 2011/2012, under the heading "Rates for 2011/2012", sub-headings "General Rates" and "Differential Rates".
- 3. This submission seeks a minor amendment to the current wording of the rural rating differential policy as currently worded in the 2009-2019 LTCCP rating policy, to address inconsistencies and inequities resulting from the current wording of the conditions that need to be met for the differential to apply.
- 4. The current wording does not ensure that all properties in rural areas which place a significantly lower demand on council services per dollar of capital value, fairly or equally receive the benefit of the rural differential. The current wording undermines the intent of the differential; that properties in rural areas with a lower demand on Council services have this reflected through a differential rate.
- 5. The Draft Annual Plan, and in particular the Rates Policy section, proposes no change to this aspect of the rural differential criteria. It is submitted that the Annual Plan should address the above issue by amending the wording of the LTCCP rating policy as sought in this submission.

#### Background

- 6. The current LTCCP Rating Policy includes a number of policies relating to the charging of rates to ensure that rates are set on a fair basis. In particular a Rural (farming and forestry) differential rating is used for a rating unit which is:
  - (a) Zoned residential or rural in the City Plan administered by the Council and situated outside of the sewered area, and where the rating unit is:
    - (i) Used solely or principally for agricultural, horticultural, pastoral or forestry purposes or the keeping of bees or poultry; or

## (ii) Vacant land not otherwise used.

- These rating units are charged 75% of the General rate that a property in the Residential sector is charged. The 2011/2012 Draft Annual Plan proposes to continue this approach unaltered.
- 8. The reason for the differential applying to the Rural (Farming and Forestry) sector is described in the Rating Policy as being because<sup>1</sup>:

of the low level of demand for Council services, per dollar of capital value, generated by farming and forestry blocks.

9. The 2011/2012 Rating Policy specifically includes:

"A reduced general rate applied by capital values for the Rural sector to reflect generally the remote location from services and the assumed lower consumption of services for each rating unit. The reduced rates are 75% of the general rate applicable to the residential and other sector."

- 10. The words "Used solely or principally for agricultural, horticultural, pastoral or forestry purposes or the keeping of bees or poultry" in Clause (a)(i) of the existing policy is a prerequisite for the rural differential. Their effect is that a property in a rurally zoned area, outside the sewered area, with a high capital value, cannot qualify for the differential unless its principal assessed use is a commercial rural use, irrespective of the actual demand per dollar of capital value.
- 11. This excludes any property that has a higher capital value than comparably sized or located commercial rural properties, places a lower or no greater demand on the council's services than such commercial properties, but is deemed to be used principally for residential purposes. It fails to achieve the aim of the policy, which is to provide a reduced rate on the basis of a low demand *per dollar of Capital value*. That result is demonstrably unjust and in conflict with the Council's broad fiduciary duty to act responsibly towards ratepayers.

2

<sup>&</sup>lt;sup>1</sup> Page 29.

- 12. This unfairness is graphically illustrated by the property at 149 Claridges Road. The Property is 2.23 hectares in size and is zoned Rural 5 (Airport Influence)<sup>2</sup>. The Property includes a house and a plant nursery. There are approximately 800 rhododendrons, and 2,200 other plants on site that have been grown for the nursery business.
- 13. As of 1 July 2009 the Property was determined by the Council to fall within the wording of the residential differential, because its principal use was considered by the Council to be residential, rather than commercial horticulture.
- 14. The general rate covers a whole raft of services. The demand placed on these services by the Property is no greater than the demand that would result from properties used principally or solely for horticultural purposes. Such properties would generally be in a rural area and would contain one residential dwelling it is these two characteristics that would primarily dictate the demand on services and these characteristics are also common to the Property in question. A further feature is that generally the owners of properties used principally or solely for horticultural services would work on the property, as is also the case with the Property under consideration.
- Other properties in the immediate vicinity of the Property in question benefit from the differential rate for rural properties, for example 132, 135 and 147 Claridges Road.
- 16. The basis for the differential applying to the rural sector in the Rating Policy is that the rural sector places a low level of demand on Council services per dollar of capital value. As set out above, the demand on services arising from the Property is no greater than the demand arising from fully commercial agricultural and horticultural properties which do benefit from the reduced rural differential rating.
- 17. Where the Property places no greater demand on services, it is fundamentally unfair for it not also to benefit from that differential in the same way.

<sup>&</sup>lt;sup>2</sup> Due to the airport reverse sensitivity issues at the heart of the Rural (Airport Influence) zone, it is highly unlikely ever to become residential; it is required to remain rural.

18. This unfairness is further emphasised in the current circumstances, considering the reference in the applicable policy to the words "*per dollar of capital value*", as is considered below.

#### Capital Value

- 19. The capital value of the Property for rating purposes is \$6,000,000.
- 20. We have attached a report from Ford Baker Valuation Limited (the Report) which demonstrates that:
  - 20.1 There would be no horticultural operation on the Property that would be viable which would have or exceed a \$6,000,000 capital value. Therefore it is not the case that it is the horticultural element that means the capital value is disproportionate to the demand placed on services. Rather the Report demonstrates that the value of the property would not exceed \$6,000,000.
  - 20.2 With reference to the table at page 2 of the Report, the capital value of other properties of a similar size (between approximately 1.6 4 hectares) within the Christchurch rating area, principally or solely used for horticultural purposes, are of significantly lesser value (with the next highest capital value listed being only \$2,660,000). Therefore the rates are even more disproportionate here than is the case with properties receiving the benefit of the rural differential.
  - 20.3 With reference to the table annexed to the Report, and the conclusions at page 3, the average capital value of Christchurch residential properties utilising Council services is approximately \$350,000; significantly less than the property in question. Therefore the benefit per dollar of capital value that these properties receive from the Council services is on average many times greater, yet they pay significantly less
- 21. The Rating Policy anticipates that the low level of demand on Council services together with a high capital value is a characteristic of a rural property. However as set out above these factors also apply to the Property in question. Therefore although the rates would result in an unfair burden this is not recognised in any of the specific rating differential categories in their current wording.

22. The Rating Policy states that capital value is used as a basis for setting rates as:

Research shows the use of capital value helps to ensure rating equity because there is a strong correlation between capital value and household income and therefore ability to pay rates.

23. It is recognised that in using capital value there may be an element of an approximation of capacity to contribute. In this regard, it should be noted that even if the 75% rate were to apply, the subject Property will still pay annual rates many times higher than the average residential property which places a higher level of demand on Council services. Even with the 75% differential, the subject Property will make a contribution that more than adequately reflects an increased ability to pay rates.

#### Relief/Proposed Wording

24. It is submitted that this inequity can be simply and effectively addressed by adding to the criteria for the applicability of the rural differential a new clause (b) to follow clause (a)(ii) Vacant land not otherwise used, to be worded as follows:

"(b) Zoned rural in the City Plan administered by the Council and situated outside of the sewered area, and where the rating unit is not used solely or principally for agricultural, horticultural, pastoral or forestry purposes or the keeping of bees or poultry, but where the demand on council services per dollar of capital value is no higher than if it were principally used for such purposes."

- 25. It is acknowledged that the Council could rely on its powers under s85 Local Government Rating Act 2002 and the remission policy at pg.101 of the Christchurch Long Term Council Community Plan 2009 2019 to provide a specific remission on fairness grounds. That policy specifically provides for the Council to, "by specific resolution, remit any rate or rates penalty when it considers it just and equitable to do so". An application for a remission of 25% of the full residential rate levied on the Property since 1 July 2009 has already been lodged with the Council.
- 26. Nevertheless, the Council's rating policy would be demonstrably more equitable and in line with the Council's duties under the Local Government Rating Act

2002, if the wording of the differential policy itself did not result in unfair situations that have to be redressed by such remission applications.

- 27. The suggested amendment to the wording achieves this and should be adopted.
- 28. We request that we be heard in support of this submission.

J M van der Wal

Solicitor for the Fairhaven Trust

Property Valuers and Advisors

FordBaker Valuation Limited Level 3, 48 Fitzgerald Avenue PO Box 43, Christchurch 8140 New Zealand Tel: +64 3 379 7830 Fax: +64 3 366 6520 Email: fordbaker@fordbaker.co.nz

> Errol Saunders Richard Chapman John Radovonich Simon Newberry Terry Naylor

15 June 2011

Duncan Cotterill Lawyers PO Box 5 CHRISTCHURCH 8140

**ATTENTION: JULIETTE DERRY** 

Dear Juliette

RE: 149 CLARIDGES ROAD, CHRISTCHURCH FAIRHAVEN FAMILY TRUST

This report has been prepared by Terrence John Naylor, B Com, SPINZ, ANZIV, MPMI, who has been in private practice as a Registered Public Valuer since 1989, working as an Urban and Rural Valuer primarily in the Canterbury/Westland Province.

Pursuant to your instructions of 1 June 2011 regarding the rates remission application for our mutual client.

We have reviewed our previous file and you have asked to make the following comments:-

1. Whether the property value would increase above \$6,000,000 if the property was used principally or solely for horticultural purposes.

We have looked at all specific horticultural uses of an intensive nature in Christchurch. These include market gardening, glasshouse production, viticulture, berry fruit, orcharding etc.

If there was an intensive glasshouse operation or viticulture operation it would require substantial capital input over and above the existing improvements that on site. This would therefore reflect the overall capital value and it is the writers opinion who has canvassed Senior Valuers within his firm in that there would be no horticultural operation that would be viable which would have or exceed a \$6,000,000 capital value.





2. The capital value of other properties of similar size within Christchurch rating area which are principally or solely used for horticultural purposes.

We include evidence as follows:-

Roll	Asse.	Full Address	Categ	Lnd.A	Flrm2	C Capital\$	Land\$	IV
21916	23003	68 JOHNS RD	HPE	3.2794	460	XT 1930000	468000	1462000
21918	47600	691 MARSHLAND RD	HPE	1.6693	150	705000	403000	302000
21800	49503	410 MARSHLAND RD	HMC	1.7664	733	980000	428000	552000
23652	11100	73 AVOCA VALLEY RD	НМВ	1.7877	70	774000	644000	130000
23652	1900	35 HOROTANE VALLEY RD	HFE	1.7882	880	WI 806000	571000	235000
21909	22701	6 STANLEYS RD	HBB	1.9585	8700	WI 1540000	675000	865000
21918	41201	744 MARSHLAND RD	HPE	2.0145	200	819000	403000	416000
23510	46800	508 BUCHANANS RD	HGB	2.0234	940	995000	316000	679000
21909	22801	62 STANLEYS RD	HGB	2.0234	6870	WI 994000	618000	376000
23510	32000	391 POUND RD	HME	2.0234	120	540000	24000	516000
21918	41200	740 MARSHLAND RD	HPB	2.1200	340	685000	420000	265000
23652	2700	50 HOROTANE VALLEY RD	HSE	2.1549	470	WI 882000	630000	252000
23510	47500	301 HASKETTS RD	HGE	2.1592	1020	882000	316000	566000
21800	49500	410 MARSHLAND RD	HMB	1.7664	140	980000	428000	552000
21909	22700	32 STANLEYS RD	HBB	2.2701	16400	2660000	630000	2030000
23652	6000	241 PORT HILLS RD	HFB	1.9537	4600	1030000	770000	260000
21800	54600	2 QUAIDS RD	HME	2.4274	80	602000	560000	42000
21800	52100	464 MARSHLAND RD	HMB	2.5124	180	780000	600000	180000
23652	3402	30 HOROTANE VALLEY RD	HGE	1.7324	1220	904000	468000	436000
21800	19100	297 MARSHLAND RD	HGB	2.5672	120	806000	428000	378000
23652	2200	49 HOROTANE VALLEY	HPE	2.6532		795000	595000	200000
23652	2500	<b>62 HOROTANE VALLEY</b>	HGE	2.8277	850	756000	595000	161000
21924	1000	63 GRASSMERE ST	HMB	2.8379	260	860000	850000	10000
21800	30700	251 MARSHLAND ROAD	HMB	2.8680	230	882000	504000	378000
21918	41600	706 MARSHLAND RD	HME	2.8705	240	BT 819000	467000	352000
21918	41700	704 MARSHLAND RD	HMF	2.8993	40	604000	442000	162000
21800	494000	404 MARSLAND ROAD	HMB	2.9970	160	819000	453000	366000
23510	43100	132 OLD WEST COAST RD	HGB	3.3210	1040	CI 1030000	331000	699000
21918	46300	587 MARSHLAND RD	HPC	3.3630	140	718000	441000	277000
21800	21100	46 WALTERS RD	НМВ	2.6190	0	1000000	501000	499000
21924		503 CRANFORD ST	HMC	3.4247	0	856000	856000	0
21916	21606	19 CLEARWATER AV	HPF	3.5010	0	1765000	1750000	15000
21800		365 PRESTONS RD	HMD	3.6027	0	590000	588000	2000
21800	26100	116 PHILPOTTS RD	HMB	3.6422	1510	1760000	1380000	380000
21916	22505	102 JOHNS RD	HPF	3.6450	0	370000	295000	75000
21916		JOHNS RD	HPF	3.7612	0	380000	300000	80000
21916	22506	140 JOHNS RD	HPF	3.8088	0	380000	300000	80000
21800	55800	275 PRESTONS RD	НМВ	3.8167	150	510000	450000	60000
21916	22501	JOHNS RD	HPF	3.8681	0	930000	900000	30000
21800	30600	263 MARSHLAND ROAD	HMB	3.9227	80	522000	424000	98000
21800	52300	478 MARSHLAND RD	HMD	3.9646	120	908000	645000	263000
21800	52500	512 MARSHLAND RD	HMD	3.9692	0	1200000	645000	555000
23512	43401	350 A MARSHS RD	HSF	4.0000	0	1380000	504000	876000
21800	83102	162 BELFAST RD	HMB	4.0399	130	695000	595000	100000

The above table shows a cross section of Horticulture Blocks in Christchurch.

15 June 2011 149 Claridges Road, Christchurch

Lnd.A =

Land Area of block

Flrm2 =

Floor Area in M2 of improvements

Capital =

Capital Value in \$

Land =

Land Value in \$

IV =

Improvements Value

3. The average capital value of Christchurch residential properties utilising Council services.

We have been given the following data from a reliable source and the table is included in the appendix. Please note that the values do include ALL categories not just residential. An interesting statistic is that for sales in the 2010 year, 8111 sales were recorded with an average Capital value of \$344,702.

We believe if all other categories (other than residential) were taken out of the total number of properties included in the appendix then the average would be less, and would be more in line with the above figure of approximately \$350,000.

We hope this correspondence is of assistance to your case, if you have queries or require us for further consultation and advice, please do not hesitate to contact the writer.

Yours faithfully

FORDBAKER VALUATION

T J NAYLOR - B COM SPINZ (ANZIV)
REGISTERED PUBLIC VALUER

DIRECTOR

DDI: Email: +64 3 964 4156 terry@fordbaker.co.nz

Matter Ref:

36264/1

File Ref:

TN149CLARIDGES.LTR

Capital Value

Capital Value										
Suburb	Count		nimum		Average		Maximum			
ADDINGTON	2796	\$	1,050	\$ \$ \$ \$	503,112	\$	52,200,000			
ADDINGTON NTH	17	\$	840	\$	422,826	\$	3,090,000			
ADDINGTON STH	59	\$	56,700	\$	638,300	\$	11,700,000			
AKAROA	1547	\$	580		593,734		5,550,000			
AKAROA STH	11	\$	412,000	\$	814,091	\$	1,420,000			
ARANUI	1658	\$	1,500	\$	221,656	\$	2,460,000			
AVONDALE	1351	\$	4,000	\$	351,304	\$	7,500,000			
AVONHEAD	3994	\$	140	\$	426,036	\$	12,825,000			
AVONSIDE	1324	\$	1,180	\$	325,614	\$	11,600,000			
BALMORAL HILL	104	\$	1,960	\$	661,470	\$	1,830,000			
BECKENHAM	1077	\$	4,000	\$	423,519	\$	6,650,000			
BELFAST	3436	\$	140	\$	488,618	\$	69,400,000			
BEXLEY	934	\$	170	\$	276,805	\$	3,940,000			
BIRDLINGS FLAT	223	\$	3,500	\$	177,713	\$	2,430,000			
BISHOPDALE	3769	\$	460	\$	359,118	\$	6,240,000			
BRIDGEND	33	\$	3,780	\$	1,013,418	\$	2,930,000			
BROMLEY	2191	\$	2,000	\$	349,178	\$	71,260,000			
BROOKLANDS	598	\$	1,960	\$	300,220	\$	3,220,000			
BROOMFIELD	407	\$	4,000	\$	295,006	\$	1,980,000			
BRYNDWR	3032	\$	1,150	\$	393,282	\$	10,000,000			
BURNSIDE	2299	\$	2,250		449,269	\$	42,400,000			
BURWOOD	3162	\$	150	\$	396,119	\$	35,400,000			
CASEBROOK	1203	\$	4,000	\$	332,101	\$	4,620,000			
CASHMERE	2738	\$	1,160	Carl Tuesday	575,077	\$	33,500,000			
CHANEYS	29	\$	4,000	\$	653,590	\$	1,720,000			
CITY	5513	\$	460		1,117,483	\$	308,000,000			
CITY ARCA	2	\$	629,000	\$	671,500		714,000			
CITY EAST	164	\$	16,800	diament of the later of	389,950	\$	3,510,000			
CITY NTH	112	\$	4,000	C. C. C. C. C. C.	1,287,422	\$	22,600,000			
CITY STH	22	\$	38,700	A 50 0000	1,986,123	\$	12,900,000			
CITY WEST	37	\$	399,000	mineral contracts	981,730		5,780,000			
CLIFTON	529	\$	2,250		660,956		4,000,000			
DALLINGTON	1922		1,180		339,711	\$	6,930,000			
DIAMOND HARBOUR	1254	Sec 40 to	1,600		435,493					
DUVAUCHELLE	423	Commence of the Santon	1,170		508,152					
FENDALTON	2723		1,470		849,776		28,500,000			
FENDALTON EAST	3	3.	67,200				21,500,000			
FERRYMEAD	314		4,000							
GLASNEVIN	78		3,920				729,000			
GOVERNORS BAY	471		300	and the same of			the state of the s			
HALSWELL	2239		700				16,250,000			
HAREWOOD	1062		700				123,000,000			
HAREWOOD NTH	1002		4,520,000				49,400,000			
HAREWOOD STH	1		972,000				972,000			
the property of the state of th	1016		230				3,550,000			
HEATHCOTE	1150		700				3,150,000			
HEI HEI	547		4,000		the state of the s		\$ 2,520,000			
HILLMORTON	774		70				\$ 22,500,000			
HILLSBOROUGH	2999		2,10				\$ 12,550,000			
HOON HAY	453		1,00	COMPANY THE PARTY.	many and the second		\$ 6,750,000			
HOON HAY VALLEY			1,00		548,87		\$ 62,930,000			
HORNBY	4184		3,78		510,99		\$ 3,890,000			
HUNTSBURY	109	1	3,76	Telephone 14	500,78	11/12-	\$ 2,920,000			
HYDE PARK	683			and the same			\$ 378,140,000			
ILAM	2349	9 \$	2,24	U .	\$ 740,71	٧	Ψ 370,140,00			

ISLINGTON	873	\$	700	\$	368,893	\$	18,300,000
LE BONS BAY	153	\$	9,150	\$	468,469	\$	3,570,000
LINWOOD	4353	\$	1,400	\$	310,154	\$	87,400,000
LITTLE RIVER	554	\$	650	\$	363,047	\$	5,900,000
LYTTELTON	1799	\$	260	\$	516,489	\$	88,200,000
MAIREHAU	853	\$	140	\$	351,260	\$	13,100,000
MARSHLAND	258	\$	140	\$	661,847	\$	21,800,000
MASHAM	242	\$	4,000	\$	337,290	\$	742,000
MCCORMACKS BAY	390	\$	3,990	\$	473,185	\$	2,390,000
MERIVALE	1860	\$	4,000	\$	796,390	\$	53,008,640
MIDDLETON	500	\$	2,800	\$	1,051,471	\$	15,800,000
MONCKS BAY	241	\$	4,000	\$	598,576	\$	5,250,000
MONCKS SPUR	398	\$	140	\$	611,543	\$	4,300,000
MOTUKARARA	203	\$	1,260	\$	604,163	\$	3,250,000
MT PLEASANT	952		2,100	\$	551,772	\$	3,750,000
NEW BRIGHTON	3020	\$	510	\$	317,683	\$	12,900,000
NORTH BEACH	33	\$	170,000	\$	434,030	\$	655,000
NORTH LINWOOD	1035	\$	4,000	\$	304,627	\$	4,750,000
NORTH NEW BRIGHTON	1792	\$	4,000	\$	291,638	\$	4,980,000
NORTH SHORE	112	\$	210	\$	489,298	\$	1,400,000
NORTHCOTE	754	\$	200	\$	289,888	\$	4,660,000
OAKLANDS	2182	\$	80	\$	409,902	\$	27,810,000
OKAINS BAY	247	\$	190	ŝ	451,325	\$	3,770,000
OPAWA	1165	\$	140	S	430,184	\$	9,330,000
OURUHIA	118	\$	6,000	S	803,164	\$	4,760,000
PAPANUI	4739	\$	700	S	507,323	\$	249,000,000
PARKLANDS	276	\$	2,100	5	472,877	\$	3,410,000
PHILLIPSTOWN	629	\$	1,400	\$	412,937	\$	12,800,000
PIGEON BAY	149	\$	1,950	\$	584,576	\$	6,800,000
PORT LEVY	141	\$	1,440	\$	461,897	\$	4,160,000
QUEENSPARK	42	\$	32	\$	204,571	\$	583,000
REDCLIFFS	727	\$	210	\$	584,058	\$	4,920,000
REDWOOD	3055	\$	510	\$	360,836	\$	24,900,000
REDWOOD PARK	66	\$	4,000	\$	492,212	\$	621,000
RICCARTON	3674	\$	2,100	\$	623,024		391,000,000
RICCARTON EAST	11.	\$	151,000	\$	409,364	\$	719,000
RICCARTON PARK	411	\$	4,000	\$	343,203	\$	21,600,000
RICCARTON WEST	64	\$	4,000	\$	735,984	\$	1,660,000
RICHMOND	2217	\$	2,500	\$	344,447		14,900,000
RICHMOND HILL	134	\$	4,000	\$	599,642	\$	1,600,000
RUSSLEY	1014		4,000	\$	365,644	\$	5,990,000
SCARBOROUGH	510	\$	2,250	\$	785,043		5,000,000
SHIRLEY	1920	\$	580	150	408,807		190,000,000
SOCKBURN	1351		700	S	764,305		23,600,000
SOMERFIELD	1206	\$	1,280	3	341,438	\$	3,200,000
SOUTH NEW BRIGHTON	1436		4,000	\$	329,333		4,000,000
SOUTHSHORE	646	\$ \$ \$	4,000	(4)	437,441		1,390,000
SPENCERVILLE	269	\$	980	\$	473,441		5,040,000
SPREYDON	5044	\$	820	\$	337,511		21,800,000
SPREYDON STH	2	\$	4,000	\$	182,000		360,000
ST ANDREWS HILL	611	\$	4,000	\$	596,594		2,990,000
ST. MARTINS	1455	\$	980		389,146		4,750,000
ST. MARTINS STH	157	\$	183,000	\$	433,178		10,700,000
ST.ALBANS	8466		1,000		403,563		20,420,000
ST.ALBANS EXT	1	\$	10,500		10,500	1 Transmit 1 19 1 1	10,500
ST.ALBANS NTH	46		259,000	\$	498,130	\$	2,730,000
The second secon							

STYX	375	\$ 420	\$	762,381	\$ 12,300,000
SUMNER	1352	\$ 3,640	\$	519,422	\$ 8,230,000
SYDENHAM	3189	\$ 420	\$	404,314	\$ 27,400,000
SYDENHAM EAST	27	\$ 158,000	\$	290,222	\$ 1,070,000
SYDENHAM STH	44	\$ 4,000	\$	799,482	\$ 3,920,000
SYDENHAM WEST	90	\$ 4,000	\$	277,380	\$ 3,010,000
TEMPLETON	853	\$ 2,100	\$	562,719	\$ 101,000,000
TRAVIS	109	\$ 140	\$	838,225	\$ 31,900,000
UPPER RICCARTON	3574	\$ 1,270	\$	432,765	\$ 41,700,000
WAIMAIRI BEACH	136	\$ 1,000	\$	443,711	\$ 3,620,000
WAINONI	2358	\$ 2,290	\$	288,571	\$ 13,500,000
WAINUI	384	\$ 2,500	\$	524,965	\$ 3,250,000
WALTHAM	1409	\$ 100	\$	389,092	\$ 67,000,000
WALTHAM EAST	55	\$ 115,000	\$	254,455	\$ 1,140,000
WENTWORTH PARK	268	\$ 4,000	\$	454,624	\$ 2,220,000
WESTHAVEN	213	\$ 700	\$	472,474	\$ 2,315,000
WESTLAKE	334	\$ 4,000	\$	463,460.	\$ 2,670,000
WESTMORLAND	753	\$ 1,400	\$	515,237	\$ 10,200,000
WOOLSTON	3887	\$ 500	\$	330,291	\$ 18,200,000
YALDHURST	522	\$ 2,000	\$	603,884	\$ 8,500,000
Total	154607	32	\$ 0	479,237	\$ 391,000,000