Plan Change 12 – Enabling Housing: Part 3 Other Appendices

Appendix 3.2 Financial Contributions

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Introduction

Purpose of this report

This report sets out detailed reasoning and the modelling and assumptions behind the provisions proposed in Hamilton City Council's Intensification Planning Instrument (IPI) Plan Change 12 – Enabling Housing. While the provisions are evaluated in the section 32 evaluation report, this report explains in more detail the issues with the current framework and how the proposed policy framework takes a holistic approach to dealing with intensification, as well as the modelling and assumptions behinds the provisions.

Background

In December 2021 the Resource Management (Enabling Housing Supply) Amendment Act (the Act) was passed into law, which requires Tier 1 territorial authorities to fast track the supply of greater housing choice. The Act introduced a suite of amendments to the Resource Management Act (RMA) and the National Policy Statement on Urban Development (NPS-UD), including the ability to collect a financial contribution for any activity other than a prohibited activity (section 77E).

Previously financial contributions could only be collected through the resource consenting process, whereby a condition of consent could be imposed under RMA s108(2) requiring a contribution of money or land in order to avoid, remedy, mitigate or offset the adverse effects of development, or to provide positive effects of development. The fundamental difference is that financial contributions can now be collected for permitted activities – that is all developments that do not require resource consent.

RMA section 77E Local authority may make rule about financial contributions

1) A local authority may make a rule requiring a financial contribution for any class of activity other than a prohibited activity.
2) A rule requiring a financial contribution must specify in the relevant plan or proposed plan-
    a) The purpose for which the financial contribution is required (which may include the purpose of ensuring positive effects on the environment to offset any adverse effect); and
    b) How the level of financial contribution will be determined; and
    c) When the financial contribution will be required.
3) To avoid doubt, if a rule requiring a financial contribution is incorporated into a specific territorial authority's district plan under section 77G, the rule does not have immediate legal effect under section 86B when an IPI incorporating the standard is notified.
4) In this section and section 77T, financial contribution has the same meaning as in section 108(9).

Section 77T Review of financial contributions provisions

Each specified territorial authority may, if it considers it appropriate to do so, include financial contributions provisions, or change its financial contributions provisions (as applicable) in the district plan, and, if it does so, may notify them in the IPI required to be notified in accordance with section 80F.

Section 108 Conditions of resource consents

1) Except as expressly provided in this section and subject to section 108AA and any regulations, a resource consent may be granted on any condition that the consent authority considers appropriate, including any condition of a kind referred to in subsection (2).
2) A resource consent may include any 1 or more of the following conditions:
    a) Subject to subsection (10), a condition requiring that a financial contribution be made:

…

9) In this section financial contribution means a contribution of-
    a) Money; or
    b) Land, including an esplanade reserve or esplanade strip (other than in relation to a subdivision consent), but excluding Maori land within the meaning of Te Ture Whenua Maori Act 1993 unless that Act provides otherwise; or
    c) A combination of money and land.
10) A consent authority must not include a condition in a resource consent requiring a financial contribution unless-
    a) The condition is imposed in accordance with the purposes specified in the plan or proposed plan (including the purpose of ensuring positive effects on the environment to offset any adverse effect); and
    b) The level of contribution is determined in the manner described in the plan or proposed plan.

Financial contributions are provided for in Chapter 24 of the Operative District Plan. The operative framework enables Council to recoup up to 100% of the infrastructure costs of development through the collection of financial contributions for the following purposes:

i. Providing and/or upgrading public network utility services and transport infrastructure.
ii. Providing and/or upgrading public reserves.
iii. Securing environmental compensation generating positive effects to offset any adverse effects of the subdivision, use or development that cannot be avoided, remedied or otherwise mitigated.

Since the provisions were made operative in 2017, they have not been utilised and financial contributions have not been collected through resource consents. Since development contributions have been utilised more over time and Council's Development Contributions Policy (DC Policy) has been tested through the courts, the use of financial contributions to fund growth has fallen away. There are also gaps in the framework that restrict what financial contributions can be collected for that would otherwise provide a funding source for other forms of infrastructure that are essential for supporting growing communities.

Through PC12 Council proposes changes to Chapter 24 that will offset the adverse effects of the scale of intensification enabled by the plan change, and will fund the installation of soft infrastructure necessary for growing communities. PC12 proposes to delete the existing chapter and replace it with provisions related to three general purposes that financial contributions will be used for:

1. Improving streetscape amenity and access to open green space
2. Ensuring the objectives of Te Ture Whaimana o Te Awa o Waikato/The Vision and Strategy for the Waikato River are met.
3. Local network infrastructure renewals

Proposed Policy Framework

This section explains in more detail the reasons for including the three new general purposes in Chapter 24 and the types of activities they are anticipated to be spent on. This section also provides and explains the proposed charges and their justification.

Intensifying since 2016

Hamilton has been promoting infill and intensification since the last District Plan review became operative in 2017. Changes to the plan enabled duplex developments down to 200m^2 sites as a non-notified, restricted discretionary activity across the General Residential Zone. The Intensification Zone discourages single detached dwellings while enabling duplexes, terraced housing, and apartments down to 150m^2 sites. These provisions have been very well taken up by the development community and individual property owners wishing to intensify their sites, so much so that the city reached its goal of 50% of all new housing to be infill well ahead of schedule.

This rapid rise in infill development has not been without its challenges. The side-effects of such rapid redevelopment have included:

- Loss of tree canopy cover and private and public amenity
- Increased perception of lack of privacy
- Increased built form and hard surfaces in residential areas
- Increased problematic on-street parking
- Inability of three waters networks to keep up with capacity and demand for water and wastewater services
- Increased stormwater runoff
- Insufficient public open and green space to meet the needs of growing communities.

This is not an exhaustive list of the consequences of development in brownfield areas, but they are difficult and costly to rectify and as development, both infill and greenfield, continues they begin to compound.

Purpose of Financial Contributions

The original intent of the NPS-UD was to create well-functioning urban environments, increase the competitiveness of land and housing markets and improve the resilience of urban areas to the effects of climate change. This still stands with the changes brought by the Act, however the force of the Act is behind enabling greater supply of housing, especially in highly urbanised areas. As Hamilton continues to intensify and becomes more urbanised, community and social infrastructure must keep pace with the rate of change, yet mechanisms to identify and fund this softer infrastructure are lacking. Hamilton City Council proposes to utilise financial contributions to fill this gap and to ensure that sense of place is retained, urban amenity is enhanced, and the adverse effects of increased built form are mitigated. To achieve this, financial contributions will be collected for three general purposes-

1. Streetscape and amenity enhancement
2. Giving effect to Te Ture Whaimana objectives; and
3. Renewal of local network infrastructure.

Application of the Policy Framework

Section 77T of the Act enables Council to pursue amendments to Chapter 24 through its IPI using the Intensification Streamlined Planning Process (ISPP) however, the proposed provisions do not have legal effect until decisions on submissions have been released.

In practice, potentially all developments, residential and non-residential, consented and non-consented, are eligible to pay financial contributions under the new policy framework. This results from the amendment in the Act which now allows financial contributions to be collected for any activity other than a prohibited activity.

Contributions will be calculated over a 10-year period on a city-wide catchment basis and distributed city-wide. For developments not requiring resource consent, financial contributions will be payable on the earlier of either building consent or service connection. Developments requiring resource consent will be required to pay financial contributions as set out in the conditions of consent. Residential developments will require financial contributions on a per-bedroom basis, while non-residential developments will require financial contributions on a per-100m^2 gross floor area (GFA) basis.

The proposed financial contributions are as follows and are explained in greater detail in the remaining sections.

Table 1. Summary of financial contribution charges.

Purpose	Per bedroom cost ($)	Per dwelling cost* ($)
Streetscape amenity		
Enhancing tree canopy cover	165.00	495.00
Upgrading parks	824.24	2,472.72
Te Ture Whaimana	581.74	1,745.22
Local network infrastructure*		
Renewals	35.09	105.27
Total	**1,600.41**	**4,801.23**

*Does not include connection costs which are 100% recovered from the developer.

In addition to urban amenity, the financial contributions policy framework empowers Council to uphold its obligations in giving effect to Te Ture Whaimana, builds climate change resilience, and is supported by the Nature in the City Strategy and He Pou Manawa Ora.

Purpose One – Streetscape and Amenity Enhancement

The scale of intensification required by the NPS-UD and the Act is such that it has the potential to drastically alter the look and feel of the city. The NPS-UD acknowledges that increasing intensification and densities in some areas may change the appearance and amenity of a neighbourhood or street, however this cannot be considered an adverse effect to prevent housing development or to decline a resource consent. The NPS-UD expects neighbourhoods to change over time and that amenity values will be subjective. Public amenity and the unique characteristics of certain streets and neighbourhoods are to be protected through urban design provisions in PC12 and provisions and scheduled items in Plan Change 9 – Historic Heritage and Natural Environments (PC9). Financial contributions are another tool that can be used to enhance and maintain streetscapes and neighbourhoods.

The purpose of the streetscape and amenity charge is to offset the adverse effects of residential intensification and provide positive impacts of developments. It will achieve this by collecting ~$3000 per additional dwelling or ~$1000 per additional bedroom to be used for increasing tree canopy cover and upgrading neighbourhood and community/sports parks. This contribution is applicable to all residential developments that result in additional residential units. These charges are derived from the costs of procuring and planting street trees and the costs of designing, constructing and landscaping of upgrades to neighbourhood parks.

*Based on a 3 bedroom dwelling

Purpose Two – Giving Effect to Te Ture Whaimana objectives

Te Ture Whaimana o te Awa o Waikato / The Vision and Strategy for the Waikato River (Te Ture Whaimana) is the primary direction-setting document for the river and has the legal weighting of a national policy statement. All territorial authorities within the catchment of the river must give effect to Te Ture Whaimana in their planning documents. Te Ture Whaimana is also explicitly recognised in section 77I of the Act as a qualifying matter that may modify Council's implementation of the Medium Density Residential Standards (MDRS). PC12 makes amendments that ensure Te Ture Whaimana is appropriately provided for in the District Plan and that land use, activities and subdivision do not contribute to further degradation of the river.

Te Ture Whaimana contains a suite of objectives for the betterment of the Waikato River. The objectives that are most relevant to the financial contribution provisions are:

a. The restoration and protection of the health and wellbeing of the Waikato River.
b. The restoration and protection of the relationship of Waikato-Tainui with the Waikato River, including their economic, social, cultural and spiritual relationships.
d. The restoration and protection of the relationship of the Waikato region's communities with the Waikato River including their economic, social, cultural and spiritual relationships.
e. The integrated, holistic and coordinated approach to management of the natural, physical, cultural and historic resources of the Waikato River.
l. The promotion of improved access to the Waikato River to enable better sporting, recreational, and cultural opportunities.

In the past all kinds of development, from urban to rural development, have had an impact on the river which has led to degradation of the water, the flora and fauna that rely on it, its banks, flood plains, receiving environments, and communities that rely on it and have a relationship with it. Te Ture Whaimana does not call for development to stop, rather that development results in the betterment of the river and its constituent parts. Infill development and intensification will have potential or actual adverse effects on the Waikato River that relate to increased stormwater runoff; infill and development in gullies; increased pollutants from the urban environment discharging to the river; increased pressure on water supply; reduced physical and visual connection with the river; and reduced habitat for native species, amongst others.

PC12 contains a suite of provisions that will lead to infill and intensification achieving betterment of the Waikato River through on-site controls that minimise impacts of development on water quality and provide better stormwater management solutions. Financial contribution provisions will enable Council to work towards achieving the objectives contained in Te Ture Whaimana, particularly in ways that have a less direct impact on the river, such as Objective (d). Financial contributions will be collected on residential and non-residential developments, city-wide, for the following specific purposes:

- Riparian enhancement
- Enhancing and maintaining public access to the Waikato River, gullies, streams and lakes
- Gully restoration and ecology and biodiversity enhancement
- Education initiatives.

The proposed contribution for this charge is ~$1700 per additional dwelling or ~$555 per additional bedroom. This cost is based on the required expenditure, both capital and operational, of undertaking the above list of activities throughout the city's entire gully network. These costs were developed for the Nature in The City programme and accepted for this review as it is an established Council programme and most likely to be responsible for undertaking the work to utilise the funds collected.

Purpose Three – Renewal of local network infrastructure

Local infrastructure networks wear out over time and require renewal. These costs are in addition to capital costs associated with growth, such as network extensions and capacity upgrades. These renewal projects are often prompted by new development occurring within a particular area.

To ensure that much-needed pipe upgrades are occurring at the local level, PC12 proposes to collect part of the cost of renewing local network infrastructure through financial contributions. Therefore, ratepayers would no longer pay for the full cost of renewing assets, as part of those costs would transfer to developers through a financial contribution. Renewals have been calculated to cost $5,700,000 over the next 10 years, and these costs have been split 50/50 between the ratepayer and developers, resulting in a financial contribution of $106 per dwelling or $35 per bedroom. This charge will mean that renewals will be able to occur as they are needed and efficiently while development is occurring.

Modelling and Charge Calculation

The financial contribution charge is calculated by distributing the total projected cost of capital spending over 10 years equitably between developments in the city. Financial contributions are divided into three general purposes. Both residential and non-residential developments will be required to pay financial contributions for Te Ture Whaimana and local network renewals, however the streetscape amenity contribution is only required by residential developments.

The contribution any development might be required to pay is calculated based on the following four components. Each will be explained in further detail.

- The number of bedrooms for residential developments and/or GFA for non-residential developments.
- The equity multiplier
- The Projected Unit of Demand (PUD) Cost
- Inflation Factor

The formula to be used to calculate a financial contribution can be described as:

$$\left[Number\ of\ bedrooms\ or\ \frac{GFA\ (m2)}{100}\right] \times [Equity\ Multiplier] \times [PUD\ Cost] \times [Inflation\ Factor]$$

Bedrooms and GFA

The basis for a financial contribution charge is the number of bedrooms for residential developments and GFA (per 100m^2) for non-residential developments. This ensures that larger developments creating a higher demand for services will pay an equitably larger contribution. A critical assumption is that 100m^{2}of GFA is equivalent to one standard residential development (one three-bedroom dwelling).

Equity Multiplier

The equity multiplier is based on the values in Table 2. These represent the differences in relative demand for levels of service between residential, commercial, retail and industrial developments. The equity multiplier acknowledges that the nature of a given development impacts the demand on council services.

The multiplier is necessary for the calculation because while the initial rate for each purpose is the same across residential and non-residential development, they are calculated at different units of measure (per-bedroom for residential development and per-100m^2 GFA for non-residential development). The measure adopts a standard three-bedroom dwelling as the standard unit of measure and assumes that 100m^2 of GFA equates to one standard residential dwelling. However non-residential developments generate different levels of demand for services than residential developments.

In order to ensure that higher demand-generating uses pay an equitable contribution, an equity conversion factor is applied. This equity conversion factor is based on the number of vehicle trips that a given type of development attracts. Travel demand is the best available proxy for demand available to Council and is adopted in the DC Policy for its transport activity weighting.

The equity conversion factor for commercial retail developments between 4,001m^2 and 10,000m^2 GFA is calculated by multiplying the total GFA (in m^2) using the formula below. This was derived to ensure a gradual decrease in charge as GFA increases, between the ranges of 1.1 and 2.5.

$$Retail\ conversion\ =\ 2.5 - \big((GFA - 4000) \times 0.000233333\big)$$

Table 2. Equity conversion factors based on a travel demand proxy.

Type of development	Equity Conversion Factor
Single Bedroom	0.33
Commercial (non-retail) (per 100m2 of GFA)	1.74
Commercial (retail) ≤ 4,000m2 GFA	2.5
Commercial (retail) 4,001 to 10,000m2 GFA	2.5 to 1.1
Commercial (retail) > 10,000m2 GFA	1.1
Industrial (per 100m2 of GFA)	0.62

Table 2 shows the conversion factors for each development. Two examples of interpreting these values are as follows:

- On average, a single bedroom would be expected to generate a third of the demand of a standard residential (3 bedroom), giving it a weighting of 0.33.
- A commercial (non-retail) development would be expected to generate 1.74 times as much demand as a standard residential per 100m^2.

Projected Unit of Demand Cost

The projected unit of demand (PUD) is a standard of unit used in a very similar way to the household unit equivalents (HUEs) adopted in the DC Policy. PUD's have been developed specifically for financial contributions so that they are more easily distinguishable from development contributions. It is necessary to combine the residential and non-residential demand referred to above into a single value for calculation so that the sum of the 10-year costs of activities identified under each contribution can be distributed across all types of development. The PUD is this combined unit, where a standard residential dwelling is considered a residential unit of demand, and a non-residential 100m^2 GFA development is a non-residential unit of demand.

Dwellings and non-residential GFA projections for the next 10 years are derived from the NIDEA 10-year projections (high) and the 2018 Waikato Integrated Scenario Explorer (WISE) forecasts. Current modelling projects 26,801.71 units of demand over the next 10 years, as broken down in Table 3.

Table 3. Dwelling projections for the next 10 years.

Demand Type	Projected Units of Demand (PUD)
Residential (Dwellings)	12011.00
Commercial (100m^{2}GFA)	4869.19
Retail (100m^{2}GFA)	1213.73
Industrial (100m^{2}GFA)	8707.79
Total	**26801.71**

The total capital spending over 10 years for the three identified purposes of financial contributions is split equally amongst the PUDs over the same period to calculate the PUD Cost. The calculations for the three general purposes are as follows.

Preliminary costings for streetscape amenity enhancements sum to a total of $36,005,500 over 10 years and are only required by residential developments (12011 PUDs). The cost per PUD is given by:

$$\frac{36{,}005{,}500}{12011} = 2997.71$$

This means that the streetscape amenity enhancement contribution is **$2997.71 per PUD.**
Preliminary costings in order to give effect to Te Ture Whaimana objectives sum to a total of $44,685,390 required by both residential and non-residential developments. The cost per unit of demand is given by:

$$\frac{47{,}247{,}288.74}{26801.71} = 1{,}762.85$$

This means that the Te Ture Whaimana contribution is **$1,762.85 per PUD**.

Preliminary costings for local network infrastructure renewals sum to a total of $5,700,000 required by both residential and non-residential developments. The cost per unit of demand is given by:

$$\frac{2{,}850{,}000}{26801.71} = 106.34$$

This means that the local network infrastructure renewals contribution is **$106.34 per PUD.**

To calculate the total PUD cost for a residential development, all three contributions are added together to **total $4,849.72** and multiplied by the number of bedrooms. To calculate the total PUD cost for a non-residential development, the Te Ture Whaimana and renewals contributions are added together to **total $1,852.01.**

Inflation Factor

The inflation factor adjusts the financial contribution on an annual basis to account for inflation of project costs. In 2022 it is 1 (or 100%), which will be adjusted on a yearly basis in alignment with the development contributions capital inflation rates.

The use of an inflation factor means that the PUD costs (reported in the previous section) will stay static for the period of the policy.

Example Calculations

In application the financial contribution for a 3 bedroom dwelling in 2022 would be calculated as:

$$3 \times 0.33 \times \$4{,}849.72 \times 1 = \$4{,}801.23$$

The financial contribution for a 400m^2 retail development in 2022 would be calculated as:

$$\left(\frac{400}{100}\right) \times 2.5 \times 1{,}852.01 \times 1 = 18{,}520.12$$

Assumptions

In order to produce the proposed financial contributions a number of assumptions were made.

1. The timeframe over which the dwelling and GFA have been forecast is 10 years. This aligns with the timeframe adopted for the costings of the three general purposes. It is assumed that Chapter 24 will be reviewed more frequently than 10 years, therefore there is opportunity to further refine the costings and forecasts adopted.

2. The equity multiplier equates a three-bedroom residential development as a Standard Residential Development. This is supported by analysis of 2022 rating data and historic analysis undertaken for the DC Policy. It is assumed that a per-bedroom equity multiplier of 0.33 would be more equitable for developers than a per-dwelling approach.

3. The PUD model uses the 2018 Waikato Integrated Scenario Explorer (WISE) forecasts as a basis for residential and non-residential development. For residential, the “high” household forecasts act as a proxy for dwelling development, re-based on 2022 actual developments. For non-residential, forecasts from Market Economics, who based their forecasts on the WISE model, are used. The WISE model is used in many Waikato based councils for forecasts. Both forecasts are also used in the DC Policy. Forecasts are for 12,011 dwellings and 14,790.71m^2 of non-residential GFA.

4. The renewals component of the policy is costed as the component of the DC Policy that was removed (i.e. not claimed for). As renewals are strictly not claimed through development contributions, there is no overlap between financial contributions and development contributions. However, development contributions are forecast over a 30-year period and are backwards-looking, therefore this contribution may need to be further refined to remove the component that has already been recovered.

5. It is assumed that not all plan-enabled development will be taken over within the 10 years that this policy framework has been developed for.

6. It is assumed that industrial zoned land is included in the non-residential allocation.

Feasibility

This section provides preliminary comments on the likely impact of the proposed financial contributions policy framework on site specific development feasibility and considers any potential impact on the NPS-UD requirement to ensure the overall sufficiency of feasible development capacity to meet demand as assessed under Council’s Housing and Business Capacity Assessment (HBA). This section will be further updated once we have the results of the feasibly capacity modelling from Market Economics which includes sensitivity testing of a range of financial contribution amounts.

Preliminary comments on how the proposed financial contribution requirement will likely affect the development feasibility and overall housing supply sufficiency are that:

a) The additional cost imposed by the financial contribution requirement will likely be relatively minor compared to the total build cost. The imposition of this marginal additional cost would therefore only affect the feasibility of developments that are only marginally profitable. For example, where the likely sales price is only marginally higher (1%) than the total build cost).
b) This assessment is based on the following assumptions:
    i. Build costs of $3000/m^2$ x $150m^2$ of a typical two story dwelling of medium quality = $450,000 total build cost (high level costs).
    ii. Financial contribution of $4,801.23/$450,000 = 1% additional development costs
c) The HBA sufficiency test requires profitability of at least 20% over and above total build costs. While there is likely a portion of potential developments that currently only just meet this test (i.e. only returning a 20% profit) the portion of development opportunities that may be removed due to this increased cost is likely only to be marginal and consequently unlikely to affect the overall level of sufficiency. Simply put, the proposed costs are unlikely to cause Council to fail its HBA sufficiency test.
d) While the imposition of an additional circa 1% development cost may exclude some potential development from the total amount of feasible development capacity as assessed under the HBA, this does not mean that these developments are no longer commercially feasible, as profits will still likely exceed costs by a fair margin (all other things being equal).

Other Matters

Local Government Act 2002

Subpart 3 of the Local Government Act (LGA) sets out how territorial authorities are to be held accountable in terms of financial management. Councils have responsibilities to prepare and update a suite of policies and strategies that detail how activities will be funded and the levels of funding. Section 101(3) states that the funding needs of the local authority must be met from those sources that the local authority determines to be appropriate, following consideration of the following five factors for each activity to be funded:

i. The community outcomes to which the activity primarily contributes; and
ii. The distribution of benefits between the community as a whole, and identifiable part of the community, and individuals; and
iii. The period in or over which those benefits are expected to occur; and
iv. The extent to which the actions or inaction of particular individuals or a group contribute to the need to undertake the activity; and
v. The costs and benefits, including consequences for transparency and accountability, of funding the activity distinctly from other activities.

Council has considered these factors in determining the quantum of financial contributions. This means that the financial contributions source of funding is tailored to reflect the factors in s101(3) and ensure that the parts of the community gaining the benefits from the activities are paying their fair and equitable share of the costs associated with those activities.

Revenue and Financing Policy

In order to provide predictability and certainty about sources and levels of funding Council must adopt a revenue and financing policy. Councils Revenue and Financing Policy was first adopted in 2004, most recently reviewed in 2021 and is to be reviewed again in 2024. The policy contains the following statement relevant to financial contributions:

"*Council collects financial contributions under the Resource Management Act 1991 to avoid, remedy or mitigate adverse effects on the environment as conditions to resource consents. The requirements for these contributions are outlined in the Operative and Proposed Hamilton District Plan. Council receives most contributions as revenue by the vesting of assets although, some may be paid directly to us.*"

The policy will require updating to reflect the new framework for financial contributions and to remove the reference to the Proposed Plan (which is now operative). The date of the next review (2024) is timely as the ISPP should be complete and decisions released to inform the policy review.