



Plan Sections: Financial Contributions

This is a summary of decisions requested in submissions made on the Proposed Te Tai o Poutini Plan. Note that this document may only contain a subset of decisions requested. Summaries of all decisions requested and details on how to make a further submission are available at www.ttpn.nz

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Manawa Energy Limited (Manawa Energy) (S438)	S438.113	Financial Contributions	FC	Oppose	<p>Manawa considers that the structure and content of this chapter as it relates to landuse activities is inappropriate and does not provide clarity or certainty for users of the Plan.</p> <p>The Financial Contribution provisions sit under the subdivision chapter heading, means that many people would not find these provisions easily and it is not obvious that they are intended to apply to landuse activities beyond subdivision. Manawa considers that if a decision is made to retain the financial contribution provisions of the Plan these are clearly separated from the subdivision provisions.</p>	<p>Remove the Financial Contribution provisions from the Subdivision Chapter, and include these in a new, clearly identifiable chapter. OR</p> <p>If a decision is made to retain these provisions in the Plan, amend the chapter heading to 'Financial Contributions - Subdivision and Landuse'.</p>
Manawa Energy Limited (Manawa Energy) (S438)	S438.114	Financial Contributions	FC	Oppose	<p>Manawa notes the stated intent to explore a move away from financial contributions to Development Contributions under the LGA and supports this approach. In noting the expressed need for this chapter in the interim, Manawa considers it important that the overview clearly set out that financial contributions are acknowledged as only one way to deal with infrastructure provision and only one method of managing adverse effects of activities. As presently drafted, it could be read as this being the fallback position for management of effects. Manawa strongly opposes the financial</p>	<p>Delete all pTTPP provisions relating to the taking of financial contributions on landuse consents for management of effects, including (but not limited to):</p> <ul style="list-style-type: none"> FC-O1 (part) FC-O2 FC-P1 (part) FC-P2 (part) FC-P6 FC-P7 FC-R1 (part) FC-R2 (part) FC-R12. <p>In the alternative, amend all of the provisions listed above in order to:</p>

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					<p>contributions proposed for the management of adverse effects on landuse consents, and does not consider that these are transparent, fair, equitable or meet the requirements of Section 32 of the Resource Management Act 1991. Manawa acknowledges that under the provisions of Section 108 of the Resource Management Act 1991 financial contributions are able to be applied to offset or compensate residual adverse effects. However, Manawa has strong concerns regarding the manner in which this regime is proposed to be established, the transparency of such and the workability of the provisions outlined in the pTTPP.</p> <p>Section 108 (10) prescribes that a consent authority must not include a condition requiring a financial contribution unless</p> <p>(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</p> <p>(b) The level of contribution is determined in the manner described in the plan or proposed plan.</p> <p>Manawa considers that the pTTPP does not include enough specificity about how the level of contributions will be set, the use of such contributions, and how these will be applied to proposals.</p> <p>Manawa also has a concern that financial contributions may be imposed for adverse effects which are addressed in other ways (such as mitigation) - essentially leading to duplication or double dipping. It also queries the ability to financially offset or compensate for residual adverse environmental effects on values such as ONLs, and how the</p>	<ul style="list-style-type: none"> • clearly state the purpose of contributions, and whether these are intended to apply to offsetting and/or compensation (or only the latter as indicated in Rule FC - R1(1)). • clearly set out the relationship between the various sections of the Plan, particularly the principles established in ECO P9 and the relationship to FC - R12. • state how and when contributions will be applied (i.e. if financial contributions are to be collected to offset or compensate for residual adverse effects then the money or land should be used to fulfil that purpose). • explain the nature of the contribution - noting that Section 108 of the Resource Management Act prescribes those financial contributions can be taken for money or land only. • provide a clear methodology for how such a contribution will be calculated, over which period of time, and who is responsible for such a calculation. • explain how the various Councils administering the Plan will implement these provisions in a cohesive, co ordinated and transparent manner, and deal with any cross boundary matters (including projects or associated effects or offsetting/ compensation) that transcend local authority boundaries.

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					<p>contributions regime will work in conjunction with the natural features and landscapes provisions, which set up a different effects management framework to the indigenous biodiversity provisions.</p> <p>At a more general level, Manawa also opposes the use of terminology which is inconsistent with higher level policy documents - in particular the requirement in FC - P6 that such conditions will be used to manage adverse effects where these cannot be avoided, remedied or mitigated; inconsistent use of terminology applying to significant indigenous biodiversity / significant indigenous vegetation or areas of significant habitat of indigenous fauna.</p> <p>For the above reasons Manawa seeks that the provisions relating to the imposition of financial contributions for the purpose of managing adverse environmental effects are deleted from the Plan. If a decision is made to pursue the incorporation of these provisions, Manawa requests that these be amended substantially to:</p> <ul style="list-style-type: none"> • clearly state the purpose of contributions, and whether these are intended to apply to offsetting and/or compensation (or only the latter as indicated in Rule FC - R1(1)). • clearly set out the relationship between the various sections of the Plan, particularly the principles established in ECO P9 and the relationship to FC - R12. • state how and when contributions will be applied (i.e. if financial contributions are to be collected to offset or compensate for residual adverse effects then the money or land should be used to fulfil that purpose). • explain the nature of the contribution - noting that Section 108 of the Resource 	

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					<p>Management Act prescribes those financial contributions can be taken for money or land only.</p> <ul style="list-style-type: none"> • provide a clear methodology for how such a contribution will be calculated, over which period of time, and who is responsible for such a calculation. • explain how the various Councils administering the Plan will implement these provisions in a cohesive, co ordinated and transparent manner, and deal with any cross boundary matters (including projects or associated effects or offsetting/ compensation) that transcend local authority boundaries. <p>Manawa also wishes to be specifically consulted on any such amended provisions and reserves the right to comment on these. It also notes that the Councils may be required to alter the District Plan to align with the principles of the yet to be released National Policy Statement on Indigenous Biodiversity. Manawa also reserves the right to be involved and comment on any such changes to the Plan as a result of notification of this statement.</p> <p>Manawa has sought amendments to other provisions of the Plan relating to financial contributions (beyond those relating to landuse) as outlined in the detailed submission points.</p> <p>It is recommended that all aspects of this section that relate to landuse activities (other than subdivision) and the management of effects, be reconsidered such that financial contributions are not relied on as the method of managing adverse effects on the environment. The way in which these provisions are currently worded is</p>	

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					<p>misleading, implying that adverse effects can be paid for rather than dealt with through the effects management hierarchy. If it is decided to continue to incorporate aspects of effects management in these provisions, then it needs to be amended to clearly state that it is only one option, and there needs to be clarity in the use of terminology used (e.g. offsetting is a term used in relation to biodiversity and not applicable to other effects). The chapter uses 'offsetting', 'compensation' and 'mitigation' interchangeably and this is confusing and inappropriate.</p> <p>Manawa's recommended approach is the removal of all aspects of this chapter relating to managing adverse effects. It considers that if the pTTPP wishes to utilise financial contributions to deal with the management of adverse effects then a plan change or variation to the Plan should be notified.</p>	
Chris & Jan Coll (S558)	S558.176	Financial Contributions	FC	Amend	An advice note that lays out a mediation process would be helpful.	Include an advice note that outlines how a mediation process could be used to resolve disputes regarding financial contributions.
Chris J Coll Surveying Limited (S566)	S566.176	Financial Contributions	FC	Amend	An advice note that lays out a mediation process would be helpful.	Include an advice note that outlines how a mediation process could be used to resolve disputes regarding financial contributions.
William McLaughlin (S567)	S567.250	Financial Contributions	FC	Amend	An advice note that lays out a mediation process would be helpful.	Include an advice note that outlines how a mediation process could be used to resolve disputes regarding financial contributions.
Laura Coll McLaughlin (S574)	S574.176	Financial Contributions	FC	Amend	An advice note that lays out a mediation process would be helpful.	Include an advice note that outlines how a mediation process could be used to resolve disputes regarding financial contributions.

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Westland District Council (S181)	S181.019	Financial Contributions	Financial Contributions	Support	Westland District Council supports these Objectives and Policies but opposes parts of the rules as outlined	Retain the objectives and policies
Buller District Council (S538)	S538.230	Financial Contributions	Financial Contributions	Support in part	Financial contributions speaks not only to subdivision, but land-use and development as well.	Separate the financial contribution section from subdivision.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.026	Financial Contributions	Financial Contributions	Amend	The district Plan cannot contain provisions that do not give effect to Chapter 7 WCRPS. That means that any provision for financial contributions in lieu of following the required WCRPS approach for biodiversity, whether in the Financial Contributions chapter or elsewhere in the Plan, are inappropriate and must be deleted.	All provisions in the Financial Contributions chapter that provide for financial contributions in lieu of appropriately managing adverse effects, in particular on biodiversity and landscape, should be deleted.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.260	Financial Contributions	Financial Contributions	Amend	The approach inherent in this chapter to using financial contributions to manage adverse effects needs to be reconsidered.	Reconsider approach in this chapter and make amendments. It must be clear that the obligation to manage adverse effects lies with the consent applicant. In particular, any provisions that provides for the payment of a financial contribution for biodiversity effects, or landscape effects, must be deleted.
Greg Maitland (S571)	S571.010	Financial Contributions	Financial Contributions	Oppose	no reason why a land owner should gift land or a cash payment.	Delete
Department of Conservation (S602)	S602.118	Financial Contributions	Financial Contributions	Neutral	DOC is neutral as these do not affect priority conservation values, biodiversity values, or DOC's interests.	NA
Te Runanga o Ngai Tahu, Te Runanga o Ngati Waewae, Te Runanga o Makaawhio (S620)	S620.177	Financial Contributions	Financial Contributions	Amend	Should also take into account effects on mana whenua values associated with the land and values within the land to which the off set is required.	Amend the rule and/or provision of the plan including the Financial Contributions chapter to ensure that there is sufficient consideration of Poutini Ngāi values at the site and the impact off-setting/compensation may have on them before it is utilised.

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Department of Conservation (S602)	S602.112	Financial Contributions	Overview	Amend	The overview should be amended to remove offsetting which is not a form of compensation.	Amend Paragraph 1: This section of Te Tai o Poutini Plan contains the objectives, policies and rules for financial contributions for infrastructure and for their use to offset where compensation is required to address adverse effects on the environment of the West Coast/Te Tai o Poutini.....
Buller District Council (S538)	S538.228	Financial Contributions	Financial Contributions Objectives	Support in part	<p>Council generally supports the objectives and policies for Financial Contributions with the exception of the following concerns.</p> <p>By implications of the section/headings are FC's only required for subdivision.</p> <p>Would recommend FC's included in section covering Part 2 - District Wide Matters</p> <p>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.</p> <p>FC OBJECTIVES Supported Noted that FC's to cover: • Subdivision • Development • Land use consents</p> <p>Simplify P4 and P6 for clarity and ease of reading.</p>	Reword P4 and P6.
Te Mana Ora (Community and Public Health) of the	S190.379	Financial Contributions	FC - O1	Support	We support this objective.	Retain objective.

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NPBS/ Te Whatu Ora (S190)						
Chris & Jan Coll (S558)	S558.145	Financial Contributions	FC - O1	Amend	The objective is too absolute and has a duplication error.	Amend as follows: Through the use of Financial Contributions the West Coast/Te Tai o Poutini's infrastructure is able to meet the demands generated by subdivision, land use and development so that it does not adversely affect adverse effects on natural and physical resources, or compromise the quality of service provided to existing users, is remedied or mitigated through the use of financial contributions.
Chris J Coll Surveying Limited (S566)	S566.145	Financial Contributions	FC - O1	Amend	The objective is too absolute and has a duplication error.	Amend as follows: Through the use of Financial Contributions the West Coast/Te Tai o Poutini's infrastructure is able to meet the demands generated by subdivision, land use and development so that it does not adversely affect adverse effects on natural and physical resources, or compromise the quality of service provided to existing users, is remedied or mitigated through the use of financial contributions.
William McLaughlin (S567)	S567.222	Financial Contributions	FC - O1	Amend	The objective is too absolute and has a duplication error.	Amend as follows: Through the use of Financial Contributions the West Coast/Te Tai o Poutini's infrastructure is able to meet the demands generated by subdivision, land use and development so that it does not adversely affect adverse effects on natural and physical resources, or compromise the quality of service provided to existing users, is remedied or mitigated through the use of financial contributions.
Laura Coll McLaughlin (S574)	S574.145	Financial Contributions	FC - O1	Amend	The objective is too absolute and has a duplication error.	Amend as follows: Through the use of Financial Contributions the West Coast/Te Tai o Poutini's infrastructure is able to meet the demands generated by

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						subdivision, land use and development so that it does not adversely affect adverse effects on natural and physical resources, or compromise the quality of service provided to existing users, is remedied or mitigated through the use of financial contributions.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.380	Financial Contributions	FC - O2	Support	We support this objective.	Retain objective.
Manawa Energy Limited (Manawa Energy) (S438)	S438.115	Financial Contributions	FC - O2	Oppose	As per earlier comments Manawa do not consider that financial contributions should be used as the sole mechanism to ensure that subdivision, land use and development does not adversely affect natural and physical resources.	Delete FC - O2 OR Amend FC - O2 as follows To ensure that new activities and development contributes fairly and equitably towards the costs of avoiding, remedying, mitigating or offsetting managing adverse effects on the environment and infrastructure resources of the West Coast/Te Tai o Poutini.
Ball Developments Ltd (S453)	S453.007	Financial Contributions	FC - O2	Support		Retain
Westpower Limited (S547)	S547.334	Financial Contributions	FC - O2	Amend	To recognise where offsetting and compensation is offered by any applicant.	Amend: To ensure that ... remedying or mitigating adverse effects, including any proposed offsetting or compensation , on the environment
Chris & Jan Coll (S558)	S558.146	Financial Contributions	FC - O2	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.146	Financial Contributions	FC - O2	Support		Retain
William McLaughlin (S567)	S567.223	Financial Contributions	FC - O2	Support		Retain
Laura Coll McLaughlin (S574)	S574.146	Financial Contributions	FC - O2	Support		Retain

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Department of Conservation (S602)	S602.113	Financial Contributions	FC - O2	Amend	Amend Objective FC-O2 to include compensation as a contribution towards addressing adverse effects.	Amend: To ensure that new activities and development contributes fairly and equitably towards the costs of avoiding, minimising , remedying, mitigating or offsetting or compensating for adverse effects on the environment and infrastructure resources of the West Coast/Te Tai o Poutini.
Buller District Council (S538)	S538.229	Financial Contributions	Financial Contributions Policies	Support in part	<p>Council generally supports the objectives and policies for Financial Contributions with the exception of the following concerns.</p> <p>By implications of the section/headings are FC's only required for subdivision.</p> <p>Would recommend FC's included in section covering Part 2 - District Wide Matters</p> <p>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.</p> <p>FC OBJECTIVES Supported Noted that FC's to cover: • Subdivision • Development • Land use consents</p> <p>Simplify P4 and P6 for clarity and ease of reading.</p>	Reword P4 and P6.
Te Mana Ora (Community and Public Health) of the	S190.381	Financial Contributions	FC - P1	Support	We support this policy.	Retain policy.

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NPHS/ Te Whatu Ora (S190)						
Ball Developments Ltd (S453)	S453.008	Financial Contributions	FC - P1	Support		Retain
Chris & Jan Coll (S558)	S558.147	Financial Contributions	FC - P1	Amend		Amend as follows: To require financial contributions as a condition of subdivision, ... as a result of the subdivision, land use or development.
Chris J Coll Surveying Limited (S566)	S566.147	Financial Contributions	FC - P1	Amend		Amend as follows: To require financial contributions as a condition of subdivision, ... as a result of the subdivision, land use or development.
William McLaughlin (S567)	S567.224	Financial Contributions	FC - P1	Amend		Amend as follows: To require financial contributions as a condition of subdivision, ... as a result of the subdivision, land use or development.
Laura Coll McLaughlin (S574)	S574.147	Financial Contributions	FC - P1	Amend		Amend as follows: To require financial contributions as a condition of subdivision, ... as a result of the subdivision, land use or development.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.382	Financial Contributions	FC - P2	Support	We support this policy.	Retain policy.
Manawa Energy Limited (Manawa Energy) (S438)	S438.116	Financial Contributions	FC - P2	Oppose	As per earlier comments Manawa do not consider that financial contributions should be used as the sole mechanism to ensure that subdivision, land use and development does not adversely affect natural and physical resources. It considers that the policy should be amended to ensure that any financial contributions taken are also reasonable and appropriate to the circumstances, and that any financial	Amend FC - P2 as follows: Financial contributions shall be applied in a fair and equitable manner that: a)Is financially transparent, reasonable and appropriate to the circumstances; b)Reflects the adverse effects and demand on services and facilities generated by the subdivision, land use or development; c)Is complementary to the Council's other financial management policies; and

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					benefits (such as interest) associated with the taking, holding and allocating of financial contributions are also taken into account.	d)Takes into account any costs incurred and financial benefits associated with the taking, holding and allocating the financial contributions.
Chris & Jan Coll (S558)	S558.148	Financial Contributions	FC - P2	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.148	Financial Contributions	FC - P2	Support		Retain
William McLaughlin (S567)	S567.225	Financial Contributions	FC - P2	Support		Retain
Laura Coll McLaughlin (S574)	S574.148	Financial Contributions	FC - P2	Support		Retain
David Ellerm (S581)	S581.032	Financial Contributions	FC - P2	Amend	Financial contributions should not be viewed by Council as a funding source	Amend to add: e. That the spending of any financial contribution are applied within the locality of the subdivision, use or land development; andf. Agreement is reached as to the most beneficial use of those monies wiht the developer.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.383	Financial Contributions	FC - P3	Support	We support this policy.	Retain policy.
Ball Developments Ltd (S453)	S453.009	Financial Contributions	FC - P3	Support		Retain
Chris & Jan Coll (S558)	S558.149	Financial Contributions	FC - P3	Amend	May be the most appropriate place to specify how these disputes can be resolved.	Financial contributions may be taken in the form of cash, land, works or a combination of these in discussion with the applicant but at the final discretion of the Council.
Chris J Coll Surveying Limited (S566)	S566.149	Financial Contributions	FC - P3	Amend	May be the most appropriate place to specify how these disputes can be resolved.	Financial contributions may be taken in the form of cash, land, works or a combination of these in discussion with the applicant but at the final discretion of the Council.

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William McLaughlin (S567)	S567.226	Financial Contributions	FC - P3	Amend	May be the most appropriate place to specify how these disputes can be resolved.	Financial contributions may be taken in the form of cash, land, works or a combination of these in discussion with the applicant but at the final discretion of the Council.
Laura Coll McLaughlin (S574)	S574.149	Financial Contributions	FC - P3	Amend	May be the most appropriate place to specify how these disputes can be resolved.	Financial contributions may be taken in the form of cash, land, works or a combination of these in discussion with the applicant but at the final discretion of the Council.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.384	Financial Contributions	FC - P4	Support	We support this policy.	Retain policy.
Ball Developments Ltd (S453)	S453.010	Financial Contributions	FC - P4	Support		Retain
Ball Developments Ltd (S453)	S453.012	Financial Contributions	FC - P4	Amend	That the wording be clarified.	Where land is provided by way of a financial contribution to ensure that such land shall be suitable for the intended use bearing in mind the community to be served. The value of works undertaken to make the land suitable for the intended use shall be taken into consideration, in discussion with the applicant but at the final discretion of the Council. This shall include streetscape improvements, shared pathways, landscaping, planting, recreation facilities and community facilities provided.
Chris & Jan Coll (S558)	S558.150	Financial Contributions	FC - P4	Support		Retain
Chris J Coll Surveying Limited (S566)	S566.150	Financial Contributions	FC - P4	Support		Retain
William McLaughlin (S567)	S567.227	Financial Contributions	FC - P4	Support		Retain

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Laura Coll McLaughlin (S574)	S574.150	Financial Contributions	FC - P4	Support		Retain
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.385	Financial Contributions	FC - P5	Support	We support this policy.	Retain policy.
Ball Developments Ltd (S453)	S453.011	Financial Contributions	FC - P5	Support		Retain
Chris & Jan Coll (S558)	S558.151	Financial Contributions	FC - P5	Amend		To use This shall can include roading, streetscape improvements, shared pathways, vehicle parking, EV charging spaces, service lanes, water supply, wastewater, stormwater, parks, reserves, recreation facilities and/or community facilities.
Chris J Coll Surveying Limited (S566)	S566.151	Financial Contributions	FC - P5	Amend		To use This shall can include roading, streetscape improvements, shared pathways, vehicle parking, EV charging spaces, service lanes, water supply, wastewater, stormwater, parks, reserves, recreation facilities and/or community facilities.
William McLaughlin (S567)	S567.228	Financial Contributions	FC - P5	Amend		To use This shall can include roading, streetscape improvements, shared pathways, vehicle parking, EV charging spaces, service lanes, water supply, wastewater, stormwater, parks, reserves, recreation facilities and/or community facilities.
Laura Coll McLaughlin (S574)	S574.151	Financial Contributions	FC - P5	Amend		To use This shall can include roading, streetscape improvements, shared pathways, vehicle parking, EV charging spaces, service lanes, water supply, wastewater, stormwater, parks, reserves, recreation facilities and/or community facilities.

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Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.386	Financial Contributions	FC - P6	Support	We support this policy.	Retain policy.
Transpower New Zealand Limited (S299)	S299.086	Financial Contributions	FC - P6	Oppose	Transpower opposes the policy as: The basis for applying the policy to critical infrastructure is unclear. The basis for extending the offsetting and compensation requirement beyond significant natural areas is not clear and not supported. The policy does not adopt the mitigation hierarchy.	Either delete Policy FC-P6 or amend the policy to not apply to the National Grid.
Manawa Energy Limited (Manawa Energy) (S438)	S438.117	Financial Contributions	FC - P6	Oppose	As per earlier comments Manawa seek that this policy be deleted, or otherwise amended to be clearly directed to management of effects not to offsetting or compensation, and to identify that financial contributions are only one method of managing adverse environmental effects.	Delete FC - P6 OR Amend FC - P6 as follows: To provide for the use of financial contributions as a method of managing adverse environmental effects, including those on significant indigenous biodiversity and outstanding natural landscapes where these cannot practically be avoided, remedied or mitigated, and recognise that some the activities have specific spatial location requirements or functional and operational needs such as mineral extraction, renewable electricity generation activities and regionally significant critical infrastructure.
Westpower Limited (S547)	S547.335	Financial Contributions	FC - P6	Support	Is an appropriate policy	Retain
Chris & Jan Coll (S558)	S558.152	Financial Contributions	FC - P6	Support		To provide ... such as but not limited to mineral extraction, renewable electricity generation activities and critical infrastructure.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.261	Financial Contributions	FC - P6	Oppose	This is contrary to WCRPS and RMA requirements regarding effects management.	Delete

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Chris J Coll Surveying Limited (S566)	S566.152	Financial Contributions	FC - P6	Support		To provide ... such as but not limited to mineral extraction, renewable electricity generation activities and critical infrastructure.
William McLaughlin (S567)	S567.229	Financial Contributions	FC - P6	Support		To provide ... such as but not limited to mineral extraction, renewable electricity generation activities and critical infrastructure.
Laura Coll McLaughlin (S574)	S574.152	Financial Contributions	FC - P6	Support		To provide ... such as but not limited to mineral extraction, renewable electricity generation activities and critical infrastructure.
Department of Conservation (S602)	S602.114	Financial Contributions	FC - P6	Amend	Amend Policy FC-P6 as the financial contribution required to address any residual effects on significant values and areas should only be applied to residual adverse effects that cannot otherwise be addressed by applying the effects management hierarchy. The policy should apply to all significant natural values and areas. Delete reference to mineral extraction as the overview is explicit that this chapter relates to infrastructure only.	Amend: To provide for allow the use of financial contributions for managing adverse environmental effects to address residual adverse effects , including those on significant indigenous biodiversity and outstanding natural landscapes outstanding natural landscape and/or features, outstanding natural character, areas of significant indigenous vegetation or areas of significant habitat of indigenous fauna where these cannot be otherwise avoided, minimised, remedied, or mitigated or offset and the activities have specific spatial location requirements or functional and operational needs such as mineral extraction , renewable electricity generation activities and critical infrastructure.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.387	Financial Contributions	FC - P7	Support	We support this policy.	Retain policy.
Transpower New Zealand Limited (S299)	S299.087	Financial Contributions	FC - P7	Support in part	While Transpower opposes the requirement for financial contributions for critical infrastructure, if it is retained, Transpower is supportive of this policy.	If Policy FC-P6 is retained, also retain this policy.

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Manawa Energy Limited (Manawa Energy) (S438)	S438.118	Financial Contributions	FC - P7	Support in part	Manawa is generally supportive of the specific recognition of the local, regional and national benefits of the proposed activity when calculating financial contributions, noting the issues raised above. However it considers that this should be taken further and that clear formulas / methods of calculation be included in the Plan. In the interim, this policy should be deleted as inadequate to meet the requirements of the Resource Management Act.	Delete FC - P7
Westpower Limited (S547)	S547.336	Financial Contributions	FC - P7	Support	Is an appropriate policy	Retain
Chris & Jan Coll (S558)	S558.154	Financial Contributions	FC - P7	Amend		Retain
Chris J Coll Surveying Limited (S566)	S566.154	Financial Contributions	FC - P7	Amend		Retain
William McLaughlin (S567)	S567.230	Financial Contributions	FC - P7	Amend		Retain
Laura Coll McLaughlin (S574)	S574.154	Financial Contributions	FC - P7	Amend		Retain
Department of Conservation (S602)	S602.115	Financial Contributions	FC - P7	Oppose	Delete Policy FC - P7 in its entirety as the spatial location requirements or functional and operational needs of activities is already considered in Policy P6 above, and the benefits of the activity should not have any bearing on whether compensation to address residual effects is needed.	Delete Policy FC - P7 in its entirety. When calculating financial contributions as a method of managing adverse environmental effects of activities, take into account the local, regional and national benefits of the proposed activity.
Te Tai o Poutini Plan Committee (S171)	S171.010	Financial Contributions	Financial Contribution Rules	Support	There is no escalation rule for Financial Contributions, where the Permitted Activity rule is not met.	Where Permitted Activity Standards are not met, provide a Discretionary Activity Rule for Financial Contributions.
Westland District Council (S181)	S181.021	Financial Contributions	Financial Contribution Rules	Amend	FC - R5 1., FC - R6 1., FC - R8 1., FC - R9 1. and FC - 10 1 Council has concerns with the wording 'Financial contributions may be imposed' ... As above, use of the word 'may' becomes	Change the wording from 'Financial contributions may be imposed' to something to the effect of 'Financial Contributions shall be required (unless determined otherwise by Council)'. This would need to be altered to the

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					<p>less of a rule and more of a voluntary policy. This will create an issue for staff trying to direct the payment of a contribution as there is immediate room for an applicant to argue that Council does not have to impose the contribution, therefore it should not be imposed. There has also been a lot of feedback from developers over the years that they would like more certainty regarding what their development is likely to cost, where this wording creates a lot of ambiguity. Furthermore if/when Council stands its ground on imposing a contribution it has been proven many times that such matters become political. Staff then struggle to justify the requirement as the rule is not actually a rule but a mere suggestion.</p>	relevance of each rule.
Westland District Council (S181)	S181.022	Financial Contributions	Financial Contribution Rules	Amend	<p>FC - R3 1., FC - R7 2., FC - R8 2., FC - R9 2., FC - R11 1</p> <p>Council has concerns with setting a maximum contribution and not a standard minimum. It is agreed that Council should be able to seek up to 100% financial contribution for infrastructure, however there is concern without a standard minimum there is a lot of room to contest how much should be applied. As above it is preferred by developers and staff to have a better understanding of what the standard minimum to be applied would be. It would be deemed appropriate to have a standard minimum of 50% contribution with a maximum of 100% allowing</p>	Change wording from 'The maximum contribution required for the development and upgrading of ... that serve a subdivision, land use or development shall be 100% of the estimated cost.' to 'The maximum contribution required for the development and upgrading of ... that serve a subdivision, land use or development shall be 100% of the estimated cost with a minimum contribution of 50% (unless determined otherwise by Council)

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					any other arrangement at the discretion of the Council.	
Westland District Council (S181)	S181.020	Financial Contributions	FC - R1	Amend	Council has concerns with the wording 'A condition may be imposed' ... Use of the word 'may' becomes less of a rule and more of a voluntary policy. This will create an issue for staff trying to direct the payment of a contribution as there is immediate room for an applicant to argue that Council does not have to impose the contribution, therefore it should not be imposed. There has also been a lot of feedback from developers over the years that they would like more certainty regarding what their development is likely to cost, where this wording creates a lot of ambiguity. Furthermore if/when Council stands its ground on imposing a contribution it has been proven many times that such matters become political. Staff then struggle to justify the requirement as the rule is not actually a rule but a mere suggestion.	Change the wording from 'A condition may be imposed' to 'A condition shall be imposed on a subdivision or land use consent to require the applicant, including network utility operators and/or requiring authorities, to make a financial contribution for the following purposes (unless determined otherwise by Council)'.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.388	Financial Contributions	FC - R1	Support	We support this rule.	Retain rule.
Transpower New Zealand Limited (S299)	S299.088	Financial Contributions	FC - R1	Oppose	The policy support for the application of R1 to requiring authorities is not evident. A financial contribution differs from offsetting and compensation. There is no clear policy direction or guidance as to the circumstances in which a contribution will be required.	Delete FC-R1 as it applies to the National Grid
Ball Developments Ltd (S453)	S453.013	Financial Contributions	FC - R1	Amend	No monetary contribution should be imposed on land that is to be vested.	Any allotment that is vested in Council or the Crown: e.g., local purpose or open space reserves.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Ball Developments Ltd (S453)	S453.014	Financial Contributions	FC - R1	Amend	Council will not be disadvantaged by exempting amalgamated allotments.	(ii) Allotments that are amalgamated with any other allotment at the time of subdivision.
Davis Ogilvie & Partners Ltd (S465)	S465.010	Financial Contributions	FC - R1	Amend	<p>Subsections (iv) and (v) exclude allotments for utilities, or where they are protected for ecological, historic and cultural reasons. We submit that these exclusions should be extended to include:</p> <p>(i) Any allotment that is vested in Council or the Crown: e.g., local purpose or open space reserves. These reserves are created in keeping with the purpose of Rule FC - R10(1) (Financial Contribution for Reserves and Community Facilities): Financial contributions paid under Rule FC - R10 for new residential, commercial or industrial lots will provide funding for maintenance of reserves. The reserves themselves cannot be considered to generate any need for these facilities, so no monetary contribution should be imposed on land that is to be vested in the Territorial Authority or the Crown. Allotments that are amalgamated with any other allotment at the time of subdivision. Where allotments are amalgamated, this is usually due to access or servicing matters, and the resultant property is treated as one "site" for rating and development purposes.</p> <p>Noting that Rule FC - R10(2)(ii) and (iii) allow for financial contributions to be imposed at building consent stage, Council will not be disadvantaged by exempting amalgamated allotments from payment of reserves contributions.</p>	Amend the rule to exclude any allotment that is vested in Council or the Crown and allotments that are amalgamated with any other allotment at the time of subdivision.
Buller District Council (S538)	S538.231	Financial Contributions	FC - R1	Support in part	Council supports Rule 1, however seeks to add additional details that may be missing. Make it consistent with P1, to include development, resilience initiatives and Water	To amend as follows: 1. A condition may be imposed on a subdivision, development , or land use consent to require the applicant, including network utility

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					Entities. As the sentence of Point 3 is too long, Council seeks to have clearer wording for ease of reading. Council seeks to add resilience initiatives to upgrades and extensions and Water Entities Plan on top of the Long Term Plan. Clarify 3. iii.	operators and/or requiring authorities, to make a financial contribution for the following purposes: Reword Point 3.
Westpower Limited (S547)	S547.337	Financial Contributions	FC - R1	Amend	To accurately define the purposes for offsetting and compensation.	Amend: ii. Securing any proposed environmental offsetting or compensation where relevant to residual adverse effects
Chris & Jan Coll (S558)	S558.155	Financial Contributions	FC - R1	Amend	needs amending.	Amend point 2 to extend beyond boundary adjustment (as presently defined) to include subdivisions where the subdivision results in a reduction in the total number of allotments (or record of titles).
Chris & Jan Coll (S558)	S558.156	Financial Contributions	FC - R1	Amend	There is no certainty provided through this part of the rule, particularly point 3. v.	Point 3 needs to be rewritten to be fairer to applicants and provide some certainty.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.262	Financial Contributions	FC - R1	Oppose	This suggests that the consent applicant does not have to adequately manage adverse effects in line with the rest of the Plan's provisions.	Delete i and ii.,
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.520	Financial Contributions	FC - R1	Amend	Alternative relief	Amend to make clear that this does not derogate from the requirement to manage adverse effects in accordance with the Plan, and that this rule does not provide for financial contributions for effects on biodiversity or landscape.
Chris J Coll Surveying Limited (S566)	S566.155	Financial Contributions	FC - R1	Amend	needs amending.	Amend point 2 to extend beyond boundary adjustment (as presently defined) to include subdivisions where the subdivision results in a reduction in the total number of allotments (or record of titles).

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Chris J Coll Surveying Limited (S566)	S566.156	Financial Contributions	FC - R1	Amend	There is no certainty provided through this part of the rule, particularly point 3. v.	Point 3 needs to be rewritten to be fairer to applicants and provide some certainty.
William McLaughlin (S567)	S567.231	Financial Contributions	FC - R1	Amend	needs amending.	Amend point 2 to extend beyond boundary adjustment (as presently defined) to include subdivisions where the subdivision results in a reduction in the total number of allotments (or record of titles).
William McLaughlin (S567)	S567.232	Financial Contributions	FC - R1	Amend	There is no certainty provided through this part of the rule, particularly point 3. v.	Point 3 needs to be rewritten to be fairer to applicants and provide some certainty.
Laura Coll McLaughlin (S574)	S574.155	Financial Contributions	FC - R1	Amend	needs amending.	Amend point 2 to extend beyond boundary adjustment (as presently defined) to include subdivisions where the subdivision results in a reduction in the total number of allotments (or record of titles).
Laura Coll McLaughlin (S574)	S574.156	Financial Contributions	FC - R1	Amend	There is no certainty provided through this part of the rule, particularly point 3. v.	Point 3 needs to be rewritten to be fairer to applicants and provide some certainty.
Department of Conservation (S602)	S602.116	Financial Contributions	FC - R1	Amend	Amend Rule R1 to accord with similar changes made to Policy FC-P6 as the financial contribution required to address any residual effects on significant values and areas should only be applied to residual adverse effects that cannot otherwise be addressed by applying the effects management hierarchy.	Amend: A condition may be imposed on a subdivision or land use consent to require the applicant, including network utility operators and/or requiring authorities, to make a financial contribution including but not limited to for the following purposes: The management of potential adverse effects arising from the activity; Securing environmental compensation where any residual adverse effects of the subdivision, use or development that cannot be avoided, minimised , remedied, or otherwise mitigated or offset ; Providing and/or upgrading public network utility services and transport infrastructure; Providing and/or upgrading public reserves, public access and community facilities; and....

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Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.389	Financial Contributions	FC - R2	Support	We support this rule.	Retain rule.
Ball Developments Ltd (S453)	S453.015	Financial Contributions	FC - R2	Amend	In accordance with the requested amendment to FC - P4.	Add: Where a financial contribution is, or includes works, the relevant District Council may specify any one or more of the following in the conditions of the resource consent: (a) The nature of works included in the financial contribution; (b) A minimum and/or maximum value of the works to be included.
Davis Ogilvie & Partners Ltd (S465)	S465.011	Financial Contributions	FC - R2	Amend	We submit that Rule FC - R2 should be amended to take into account the value of works undertaken by developers to enhance land that is vested in Council.	Amend the rule so that after R2(4), a further subsection be inserted as follows: " <i>Where a financial contribution is, or includes works, the relevant District Council may specify any one or more of the following in the conditions of the resource consent:(a) The nature of works included in the financial contribution;(b) A minimum and/or maximum value of the works to be included.</i> "
Buller District Council (S538)	S538.232	Financial Contributions	FC - R2	Support	Rule 2 is supported in principle. Council seeks to reword "uplifting" to issuing in 3.c.i.	To amend as follows: 3.c.i. In the case of subdivision, generally before issuing the section 224 certificate;
Westpower Limited (S547)	S547.338	Financial Contributions	FC - R2	Amend	The intent of the policy is supported with a minor amendment for clarity. An amendment is required as to when a contribution is payable in the case of a land use consent, i.e. before giving effect to or implementing the consent. This provides for instances where consents are unused for some time,	(1) Amend item 2, "2. Financial contributions ... contribution that is already required, or has already been paid ...". (2) Amend c.ii., "ii. In the case of land use, prior to giving effect to or implementing the resource consent; ".

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					or in some cases not at all, and effects have not occurred.	
Chris & Jan Coll (S558)	S558.157	Financial Contributions	FC - R2	Amend	Point 4.a. is too broad.	Amend point 4 as follows: 4. Where a financial contribution ... conditions of the resource consent: a. The location and area of the land within the land being subdivided or under application ; ...
Chris & Jan Coll (S558)	S558.158	Financial Contributions	FC - R2	Support	We support the reference to "a registered valuer".	Retain reference to a registered valuer.
Chris J Coll Surveying Limited (S566)	S566.157	Financial Contributions	FC - R2	Amend	Point 4.a. is too broad.	Amend point 4 as follows: 4. Where a financial contribution ... conditions of the resource consent: a. The location and area of the land within the land being subdivided or under application ; ...
Chris J Coll Surveying Limited (S566)	S566.158	Financial Contributions	FC - R2	Support	We support the reference to "a registered valuer".	Retain reference to a registered valuer.
William McLaughlin (S567)	S567.233	Financial Contributions	FC - R2	Amend	Point 4.a. is too broad.	Amend point 4 as follows: 4. Where a financial contribution ... conditions of the resource consent: a. The location and area of the land within the land being subdivided or under application ; ...
William McLaughlin (S567)	S567.234	Financial Contributions	FC - R2	Support	We support the reference to "a registered valuer".	Retain reference to a registered valuer.
Laura Coll McLaughlin (S574)	S574.157	Financial Contributions	FC - R2	Amend	Point 4.a. is too broad.	Amend point 4 as follows: 4. Where a financial contribution ... conditions of the resource consent: a. The location and area of the land within the land being subdivided or under application ; ...

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Laura Coll McLaughlin (S574)	S574.158	Financial Contributions	FC - R2	Support	We support the reference to "a registered valuer".	Retain reference to a registered valuer.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.390	Financial Contributions	FC - R3	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.233	Financial Contributions	FC - R3	Not Stated	Formulas good starting point, suggest will need to be road tested to ensure fair and reasonable. How do you deal with a back Lot that may be subdivided into 30 sections, see example below [refer to original submission]? Potentially going to increase traffic on the road the back Lot will exit onto. { Also how do you deal with impacts of development not immediacy adjacent? Example is say a single lane bridge that is on the only road that gives access to the development site but may be 500 metres from the closest point of the development?	Will need to be road tested to ensure fair and reasonable.
Chris & Jan Coll (S558)	S558.159	Financial Contributions	FC - R3	Amend	Can require an applicant to bear the full cost of upgrading a road.	Amend to ensure that Council cannot require an applicant to bear the full cost of upgrading a road that is significantly below an appropriate level of service.
Chris J Coll Surveying Limited (S566)	S566.159	Financial Contributions	FC - R3	Amend	Can require an applicant to bear the full cost of upgrading a road.	Amend to ensure that Council cannot require an applicant to bear the full cost of upgrading a road that is significantly below an appropriate level of service.
William McLaughlin (S567)	S567.235	Financial Contributions	FC - R3	Amend	Can require an applicant to bear the full cost of upgrading a road.	Amend to ensure that Council cannot require an applicant to bear the full cost of upgrading a road that is significantly below an appropriate level of service.
Laura Coll McLaughlin (S574)	S574.159	Financial Contributions	FC - R3	Amend	Can require an applicant to bear the full cost of upgrading a road.	Amend to ensure that Council cannot require an applicant to bear the full cost of upgrading a road that is significantly below an appropriate

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						level of service.
David Ellerm (S581)	S581.033	Financial Contributions	FC - R3	Amend	Clarification of the maximum road distance that Council can require upgrading.	Amend to clarify the maximum road distance from the proposed subdivision, use of development that Council can require road upgrading for increased traffic effects directly associated with a development.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.391	Financial Contributions	FC - R4	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.234	Financial Contributions	FC - R4	Not Stated	<p>Should be at full cost unless financial assistance is available, for example through Waka Kotahi / NZTA. FC-R4 2. No roads identified, but it has occurred in the past where developments can significantly increase traffic volumes. The RCA has reached agreement with the developer to contribute to roading upgrade. Issue arises as District Council RCA's are not fully funded and there is a local (rate) share of funding required to upgrade the roads. Extent of upgrade works and contribution should be offered by applicant as suggested condition of consent.</p> <p>Formulae based on cost to upgrade (strengthen) road travelled and traffic volumes. This would be applied to roads, structures and required safety improvements.</p> <p>Example worked through here:</p> <p>Variable Value Comment Existing Vehicles 100 Te</p>	<p>To amend as follows:</p> <p>1. Roads outlined in 2 below District Council's Subdivision and Development Infrastructure Technical Requirements Code standard for its place in the road hierarchy or where no such Code of Practice exists, the standards in NZS 4404:2010 Land Development and Subdivision Infrastructure.</p>

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					Development Vehicles 300 T_g Total Vehicles 400 $T_g + T_e$ Total Cost to Upgrade \$1,000,000.00 R_c NZTA Financial Assistance Rate 72% FAR NZTA contribution \$720,000.00 $R_c \times \text{FAR}$ (Road Tax contribution) Local RCA Contribution \$280,000.00 $R_c^* (= R_c - R_c \times \text{FAR})$ Development Contribution \$210,000.00 $= R_c^* \times T_g / (T_g + T_e)$ Rates Contribution \$70,000.00 $= R_c^* \times T_e / (T_g + T_e)$ Note that more than one road could be affected by increased traffic generated by the development.	
Chris & Jan Coll (S558)	S558.160	Financial Contributions	FC - R4	Amend	Support this rule and support that no roads have yet been identified.	Retain
Chris J Coll Surveying Limited (S566)	S566.160	Financial Contributions	FC - R4	Amend	Support this rule and support that no roads have yet been identified.	Retain
William McLaughlin (S567)	S567.236	Financial Contributions	FC - R4	Amend	Support this rule and support that no roads have yet been identified.	Retain
Laura Coll McLaughlin (S574)	S574.160	Financial Contributions	FC - R4	Amend	Support this rule and support that no roads have yet been identified.	Retain

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
David Ellerm (S581)	S581.034	Financial Contributions	FC - R4	Amend		Amend 2. Lake View Terrace, Iveagh Bay
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.392	Financial Contributions	FC - R5	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.235	Financial Contributions	FC - R5	Support	Rules 5 to 11 are supported.	Retain as notified.
Chris & Jan Coll (S558)	S558.161	Financial Contributions	FC - R5	Amend	believe that the rule requires some amending.	Amend the final sentence of point 1 before the formula to be as follows: The financial contribution will be charged based on the following formula for each accessible, trailer/boat park or EV charging site and or for every 5 bicycle parks not provided.
Chris & Jan Coll (S558)	S558.162	Financial Contributions	FC - R5	Amend	Greater clarity, transparency and certainty over how the costs are calculated.	Amend so there is greater clarity, transparency and certainty over how the costs are calculated.
Chris J Coll Surveying Limited (S566)	S566.161	Financial Contributions	FC - R5	Amend	believe that the rule requires some amending.	Amend the final sentence of point 1 before the formula to be as follows: The financial contribution will be charged based on the following formula for each accessible, trailer/boat park or EV charging site and or for every 5 bicycle parks not provided.
Chris J Coll Surveying Limited (S566)	S566.162	Financial Contributions	FC - R5	Amend	Greater clarity, transparency and certainty over how the costs are calculated.	Amend so there is greater clarity, transparency and certainty over how the costs are calculated.
William McLaughlin (S567)	S567.237	Financial Contributions	FC - R5	Amend	believe that the rule requires some amending.	Amend the final sentence of point 1 before the formula to be as follows: The financial contribution will be charged based on the following formula for each accessible, trailer/boat park or EV charging site and or for every 5 bicycle parks not provided.
William McLaughlin (S567)	S567.238	Financial Contributions	FC - R5	Amend	Greater clarity, transparency and certainty over how the costs are calculated.	Amend so there is greater clarity, transparency and certainty over how the costs are calculated.

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Laura Coll McLaughlin (S574)	S574.161	Financial Contributions	FC - R5	Amend	believe that the rule requires some amending.	Amend the final sentence of point 1 before the formula to be as follows: The financial contribution will be charged based on the following formula for each accessible, trailer/boat park or EV charging site and or for every 5 bicycle parks not provided.
Laura Coll McLaughlin (S574)	S574.162	Financial Contributions	FC - R5	Amend	Greater clarity, transparency and certainty over how the costs are calculated.	Amend so there is greater clarity, transparency and certainty over how the costs are calculated.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.393	Financial Contributions	FC - R6	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.236	Financial Contributions	FC - R6	Support	Rules 5 to 11 are supported.	Retain as notified.
Chris & Jan Coll (S558)	S558.163	Financial Contributions	FC - R6	Amend	The term "development" is used when "land use" may be a better term.	Replace the term "development" with "land use"
Chris J Coll Surveying Limited (S566)	S566.163	Financial Contributions	FC - R6	Amend	The term "development" is used when "land use" may be a better term.	Replace the term "development" with "land use"
William McLaughlin (S567)	S567.239	Financial Contributions	FC - R6	Amend	The term "development" is used when "land use" may be a better term.	Replace the term "development" with "land use"
Laura Coll McLaughlin (S574)	S574.163	Financial Contributions	FC - R6	Amend	The term "development" is used when "land use" may be a better term.	Replace the term "development" with "land use"
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.394	Financial Contributions	FC - R7	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.238	Financial Contributions	FC - R7	Support	Council supports R7 to R9 but seeks to add an advisory note.	To add advisory note as follow: "It shall be noted that even though existing 3 waters infrastructure may be located in an area, it may not be available, for instance if the infrastructure is on the boundary between urban and rural environmental zones."

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Chris & Jan Coll (S558)	S558.165	Financial Contributions	FC - R7	Amend	point 4 requires amending so that there is fairness, transparency and certainty to an applicant.	Amend to ensure fairness, transparency and certainty to an applicant.
Chris & Jan Coll (S558)	S558.166	Financial Contributions	FC - R7	Amend		Amend to ensure an applicant is protected from bearing the cost of an upgrade that is due to Council not adequately undertaking its responsibilities.
Chris J Coll Surveying Limited (S566)	S566.165	Financial Contributions	FC - R7	Amend	point 4 requires amending so that there is fairness, transparency and certainty to an applicant.	Amend to ensure fairness, transparency and certainty to an applicant.
Chris J Coll Surveying Limited (S566)	S566.166	Financial Contributions	FC - R7	Amend		Amend to ensure an applicant is protected from bearing the cost of an upgrade that is due to Council not adequately undertaking its responsibilities.
William McLaughlin (S567)	S567.240	Financial Contributions	FC - R7	Amend	point 4 requires amending so that there is fairness, transparency and certainty to an applicant.	Amend to ensure fairness, transparency and certainty to an applicant.
William McLaughlin (S567)	S567.241	Financial Contributions	FC - R7	Amend		Amend to ensure an applicant is protected from bearing the cost of an upgrade that is due to Council not adequately undertaking its responsibilities.
Laura Coll McLaughlin (S574)	S574.165	Financial Contributions	FC - R7	Amend	point 4 requires amending so that there is fairness, transparency and certainty to an applicant.	Amend to ensure fairness, transparency and certainty to an applicant.
Laura Coll McLaughlin (S574)	S574.166	Financial Contributions	FC - R7	Amend		Amend to ensure an applicant is protected from bearing the cost of an upgrade that is due to Council not adequately undertaking its responsibilities.
David Ellerm (S581)	S581.035	Financial Contributions	FC - R7	Amend		Amend 1. Financial contributions may are ...
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.395	Financial Contributions	FC - R8	Support	We support this rule.	Retain rule.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Buller District Council (S538)	S538.239	Financial Contributions	FC - R8	Support	Council supports R7 to R9 but seeks to add an advisory note.	To add advisory note as follow: "It shall be noted that even though existing 3 waters infrastructure may be located in an area, it may not be available, for instance if the infrastructure is on the boundary between urban and rural environmental zones."
Chris & Jan Coll (S558)	S558.167	Financial Contributions	FC - R8	Amend	Requires amending so that there is fairness, transparency and certainty to an applicant.	Amend to ensure fairness, transparency and certainty to an applicant.
Chris & Jan Coll (S558)	S558.168	Financial Contributions	FC - R8	Amend		Amend to ensure an applicant is protected from bearing the cost of an upgrade that is due to Council not adequately undertaking its responsibilities.
Chris J Coll Surveying Limited (S566)	S566.167	Financial Contributions	FC - R8	Amend	Requires amending so that there is fairness, transparency and certainty to an applicant.	Amend to ensure fairness, transparency and certainty to an applicant.
Chris J Coll Surveying Limited (S566)	S566.168	Financial Contributions	FC - R8	Amend		Amend to ensure an applicant is protected from bearing the cost of an upgrade that is due to Council not adequately undertaking its responsibilities.
William McLaughlin (S567)	S567.242	Financial Contributions	FC - R8	Amend	Requires amending so that there is fairness, transparency and certainty to an applicant.	Amend to ensure fairness, transparency and certainty to an applicant.
William McLaughlin (S567)	S567.243	Financial Contributions	FC - R8	Amend		Amend to ensure an applicant is protected from bearing the cost of an upgrade that is due to Council not adequately undertaking its responsibilities.
Laura Coll McLaughlin (S574)	S574.167	Financial Contributions	FC - R8	Amend	Requires amending so that there is fairness, transparency and certainty to an applicant.	Amend to ensure fairness, transparency and certainty to an applicant.
Laura Coll McLaughlin (S574)	S574.168	Financial Contributions	FC - R8	Amend		Amend to ensure an applicant is protected from bearing the cost of an upgrade that is due to Council not adequately undertaking its responsibilities.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
David Ellerm (S581)	S581.036	Financial Contributions	FC - R8	Amend		Amend 1. Financial contributions may are ...
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.396	Financial Contributions	FC - R9	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.240	Financial Contributions	FC - R9	Support	Council supports R7 to R9 but seeks to add an advisory note.	To add advisory note as follow: "It shall be noted that even though existing 3 waters infrastructure may be located in an area, it may not be available, for instance if the infrastructure is on the boundary between urban and rural environmental zones."
Chris & Jan Coll (S558)	S558.169	Financial Contributions	FC - R9	Amend	point 4 requires amending so that there is fairness, transparency and certainty.	Amend to ensure fairness, transparency and certainty to an applicant.
Chris & Jan Coll (S558)	S558.170	Financial Contributions	FC - R9	Amend		Amend to ensure an applicant is protected from bearing the cost of an upgrade that is due to Council not adequately undertaking its responsibilities.
Chris J Coll Surveying Limited (S566)	S566.169	Financial Contributions	FC - R9	Amend	point 4 requires amending so that there is fairness, transparency and certainty.	Amend to ensure fairness, transparency and certainty to an applicant.
Chris J Coll Surveying Limited (S566)	S566.170	Financial Contributions	FC - R9	Amend		Amend to ensure an applicant is protected from bearing the cost of an upgrade that is due to Council not adequately undertaking its responsibilities.
William McLaughlin (S567)	S567.244	Financial Contributions	FC - R9	Amend	point 4 requires amending so that there is fairness, transparency and certainty.	Amend to ensure fairness, transparency and certainty to an applicant.
William McLaughlin (S567)	S567.245	Financial Contributions	FC - R9	Amend		Amend to ensure an applicant is protected from bearing the cost of an upgrade that is due to Council not adequately undertaking its responsibilities.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Laura Coll McLaughlin (S574)	S574.169	Financial Contributions	FC - R9	Amend	point 4 requires amending so that there is fairness, transparency and certainty.	Amend to ensure fairness, transparency and certainty to an applicant.
Laura Coll McLaughlin (S574)	S574.170	Financial Contributions	FC - R9	Amend		Amend to ensure an applicant is protected from bearing the cost of an upgrade that is due to Council not adequately undertaking its responsibilities.
David Ellerm (S581)	S581.037	Financial Contributions	FC - R9	Amend		Amend 1. Financial contributions may are ...
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.397	Financial Contributions	FC - R10	Support	We support this rule.	Retain rule.
Ball Developments Ltd (S453)	S453.016	Financial Contributions	FC - R10	Amend	Will result in Council "double-dipping" for contributions.	The five-year time frame should be deleted from Rule FC - R10(2)(ii) and(iii).
Davis Ogilvie & Partners Ltd (S465)	S465.012	Financial Contributions	FC - R10	Amend	Rule FC - R10(2)(ii) and (iii) set a five-year time frame in which reserves contributions paid at subdivision may be subtracted from contributions imposed at building consent. If implemented, this rule will result in Council "double-dipping" for contributions if sections created by subdivision are not built on within five years of s224 Resource Management Act 1991 certification.	that the five-year time frame should be deleted from Rule FC - R10(2)(ii) and(iii)
Buller District Council (S538)	S538.241	Financial Contributions	FC - R10	Support	Council supports R10 and 11.	Retain as notified.
Chris & Jan Coll (S558)	S558.171	Financial Contributions	FC - R10	Amend	The term "and" is used where we believe the term "or is more appropriate.	Amend as follows: 1. ... 2. The maximum contribution shall be required as follows: i. ...; or ii. ...; and or iii. ...

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris J Coll Surveying Limited (S566)	S566.171	Financial Contributions	FC - R10	Amend	The term "and" is used where we believe the term "or is more appropriate.	Amend as follows: 1. ... 2. The maximum contribution shall be required as follows: i. ...; or ii. ...; and or iii. ...
William McLaughlin (S567)	S567.246	Financial Contributions	FC - R10	Amend	The term "and" is used where we believe the term "or is more appropriate.	Amend as follows: 1. ... 2. The maximum contribution shall be required as follows: i. ...; or ii. ...; and or iii. ...
Laura Coll McLaughlin (S574)	S574.171	Financial Contributions	FC - R10	Amend	The term "and" is used where we believe the term "or is more appropriate.	Amend as follows: 1. ... 2. The maximum contribution shall be required as follows: i. ...; or ii. ...; and or iii. ...
David Ellerm (S581)	S581.038	Financial Contributions	FC - R10	Amend		Amend 1. Financial contributions may are ...
David Ellerm (S581)	S581.039	Financial Contributions	FC - R10	Amend		Financial contributions are set at a flat rate of 3.5%
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.398	Financial Contributions	FC - R11	Support	We support this rule.	Retain rule.
Buller District Council (S538)	S538.237	Financial Contributions	FC - R11	Support	Rules 5 to 11 are supported.	Retain as notified.
Buller District Council (S538)	S538.242	Financial Contributions	FC - R11	Support	Council supports R10 and 11.	Retain as notified.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
Chris & Jan Coll (S558)	S558.172	Financial Contributions	FC - R11	Amend	May be required to upgrade a footpath, walkway or cycleway beyond what is fair	Amend to ensure fairness, transparency and certainty to an applicant.
Chris & Jan Coll (S558)	S558.173	Financial Contributions	FC - R11	Amend		Amend to ensure an applicant is protected from bearing the cost of upgrading footpath, walkway or cycleway that have an inadequate level of service before making an application or undertaking an activity that triggers a financial contribution.
Chris J Coll Surveying Limited (S566)	S566.172	Financial Contributions	FC - R11	Amend	May be required to upgrade a footpath, walkway or cycleway beyond what is fair	Amend to ensure fairness, transparency and certainty to an applicant.
Chris J Coll Surveying Limited (S566)	S566.173	Financial Contributions	FC - R11	Amend		Amend to ensure an applicant is protected from bearing the cost of upgrading footpath, walkway or cycleway that have an inadequate level of service before making an application or undertaking an activity that triggers a financial contribution.
William McLaughlin (S567)	S567.247	Financial Contributions	FC - R11	Amend	May be required to upgrade a footpath, walkway or cycleway beyond what is fair	Amend to ensure fairness, transparency and certainty to an applicant.
William McLaughlin (S567)	S567.248	Financial Contributions	FC - R11	Amend		Amend to ensure an applicant is protected from bearing the cost of upgrading footpath, walkway or cycleway that have an inadequate level of service before making an application or undertaking an activity that triggers a financial contribution.
Laura Coll McLaughlin (S574)	S574.172	Financial Contributions	FC - R11	Amend	May be required to upgrade a footpath, walkway or cycleway beyond what is fair	Amend to ensure fairness, transparency and certainty to an applicant.
Laura Coll McLaughlin (S574)	S574.173	Financial Contributions	FC - R11	Amend		Amend to ensure an applicant is protected from bearing the cost of upgrading footpath, walkway or cycleway that have an inadequate level of service before making an application or undertaking an activity that triggers a financial contribution.

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
						contribution.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.399	Financial Contributions	FC - R12	Support	We support this rule.	Retain rule.
Transpower New Zealand Limited (S299)	S299.089	Financial Contributions	FC - R12	Oppose	Transpower has significant concerns with the open nature of the rule and implications for the National Grid. Transpower has concerns how the contribution would be calculated, including to address effects on landscape values.	Clarify that R12 does not apply to the National Grid
Manawa Energy Limited (Manawa Energy) (S438)	S438.119	Financial Contributions	FC - R12	Oppose	As per earlier comments Manawa seek that this rule be deleted.	Delete FC - R12
New Zealand Energy Limited (S463)	S463.004	Financial Contributions	FC - R12	Oppose	While we understand the requirements for financial contributions to support additional operational requirements or provision of new infrastructure, we consider that conditions or costs imposed to remedy or mitigate adverse effects, on environmental, natural landscape and biodiversity values, should be managed through Regional Council consents	Remove the provisions relating to seeking financial contributions on land use consents to remedy or mitigate adverse effects on environmental, natural landscape and biodiversity values.
Buller District Council (S538)	S538.243	Financial Contributions	FC - R12	Not Stated	Financial contribution for esplanade reserves and strips to be included	Amend to include esplanade reserves and strips as a financial contribution as outlined in Part 8 of the operational Buller District Plan
Inchbonnie Hydro Limited (S540)	S540.004	Financial Contributions	FC - R12	Oppose	While we understand the requirements for financial contributions to support additional operational requirements or provision of new infrastructure, we consider that conditions or costs imposed to remedy or mitigate adverse effects, on environmental, natural landscape and biodiversity values, should be managed through Regional Council consents	Remove the provisions relating to seeking financial contributions on land use consents to remedy or mitigate adverse effects on environmental, natural landscape and biodiversity values.
Westpower Limited (S547)	S547.340	Financial Contributions	FC - R12	Amend	The Act does not limit the matters over offsetting or compensation.	Amend heading: Financial Contributions for Proposed Offsetting and Compensation ...

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Westpower Limited (S547)	S547.341	Financial Contributions	FC - R12	Amend	to advise that the amount or type of financial contribution.	Amend 1: The maximum financial contribution for offsetting or compensation for adverse effects will be the amount of money, land or works assessed as appropriate through the consent process in relation to adverse environmental effects that cannot be avoided, remedied or mitigated.
Chris & Jan Coll (S558)	S558.174	Financial Contributions	FC - R12	Support		Retain
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.029	Financial Contributions	FC - R12	Amend	We are unclear as to whether offsetting or compensation can robustly be applied as an effects management tool outside of the realm of biodiversity. The Plan provisions do not provide any direction as to what such offsetting would entail. Biodiversity offsetting has been developed over several years and has reasonably robust principles and approaches that apply to it. It is not clear how the council would be able to ensure that non-biodiversity effects would be appropriately offset or compensated for.	Where non-biodiversity offsetting or compensation is referred to in the Plan, provide policy direction, explanation, and potentially new definitions, clearly setting out what is required or envisaged. Alternatively delete the provisions referring to non- biodiversity offsetting.
Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) (S560)	S560.263	Financial Contributions	FC - R12	Oppose	This is contrary to requirement to manage effects in accordance with the RMA, WCRPS, NZCPS, and the other requirements of this Plan.	Delete
Chris J Coll Surveying Limited (S566)	S566.174	Financial Contributions	FC - R12	Support		Retain
William McLaughlin (S567)	S567.249	Financial Contributions	FC - R12	Support		Retain
Laura Coll McLaughlin (S574)	S574.174	Financial Contributions	FC - R12	Support		Retain
Department of Conservation (S602)	S602.117	Financial Contributions	FC - R12	Amend	The financial contribution required to address any residual effects on significant values and areas should be the minimum amount of	Amend: The maximum minimum financial contribution for offsetting or compensation for adverse environmental effects on outstanding

Submitter	Submission Point	Plan Section	Provision	Position	Reasons	Decision Requested
					money needed to compensate the effects. The policy should apply to all significant natural values and areas, and should be amended to remove offsetting which is not a form of compensation.	natural landscape and/or feature values, outstanding natural character values , areas of significant indigenous vegetation or areas of significant habitat of indigenous fauna will be the amount of money needed to fully offset or compensate (or any combination of these) any adverse environmental effects that cannot otherwise be avoided, minimised , remedied, or mitigated, or offset . In assessing the level of financial contribution required for biodiversity offsetting and compensation the principles in Policy ECO - P9 will be adhered to.
Grey District Council (S608)	S608.620	Financial Contributions	FC - R12	Oppose in part	Oppose R1 - 1 where the rule includes the requirement for a 'network utility operator and / or requiring authority to make a financial contribution for i. - iv.	Remove network utility operator and / or requiring authorities from the rule.
Te Mana Ora (Community and Public Health) of the NPHS/ Te Whatu Ora (S190)	S190.378	Financial Contributions	Overview	Support	Te Mana Ora supports fair and equitable funding, including financial contributions, to provide well designed infrastructure, reserves and community facilities to ensure good public health, safety, wellbeing and community resilience. Coordination and integration of infrastructure, reserves and community facilities is critical across the natural, built, social and economic environments.	