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Wellington City Council

STRATEGY AND POLICY COMMITTEE
14 SEPTEMBER 2006

REPORT 2
(1215/52/IM)

PROPOSED DISTRICT PLAN CHANGE 51: AMENDMENTS TO FINANCIAL CONTRIBUTION PROVISIONS

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1. Purpose of Report

To seek approval from the Committee to notify proposed District Plan Change 51.

The proposed change makes amendments to the General Provisions chapter, specifically section 3.4 which deals with Financial Contributions and the Permitted Activity rules of the various area chapters, to assist with interpretation and the efficient function of the District Plan.

2. Recommendation

It is recommended that the Committee:

1. *Receives the information.*

2. *Agrees to notify Proposed Plan Change 51 (attached as Appendix One of this report) in accordance with Schedule 1 of the Resource Management Act 1991.*

3. *Agrees to adopt the Section 32 Report for Proposed Plan Change 51 (attached as Appendix Two of this report).*

4. *Delegates to the Portfolio Leader for Urban Development the authority to approve minor editorial changes to the proposed Plan Change, and the authority to sign off on the final plan change documentation prior to notification.*

3. Background

Prior to 1991, section 283 of the Local Government Act 1974 enabled the Council to take reserve contributions or levies on subdivision or developments to assist with the funding of reserves and other infrastructure.

The enactment of the Resource Management Act (RMA) in 1991 introduced a new financial contrsibutions regime focused on mitigating the adverse environmental effects of development. New financial contribution provisions were prepared and included in the District Plan when this was notified in 1994. The provisions became operative in July 2000 when the District Plan was approved.

However, the application of the financial contributions provisions under the District Plan has been limiting. In particular, financial contributions have tended to focus on the direct marginal impact of the effects of particular developments without considering the wider cumulative impact of multiple developments on the infrastructure and community facilities of the district. This narrow focus has restricted the Council's ability to promote other social, economic and cultural policy objectives.

Such problems were recognised by Central Government and resulted in changes to the Local Government Act (LGA) when this was enacted in 2002. New development contribution provisions were introduced as an alternate funding tool for growth-related capital expenditure. The Local Government Act requires Council's to prepare and adopt a policy on Development Contributions or Financial Contributions as a component of its funding and financial Policies in its Long Term Council Community Plan ("LTCCP").

In July 2005, Council adopted a Development Contributions Policy and reaffirmed that policy (with some changes) as part of the 2006/07 LTCCP. The Policy stipulates that development contributions will be the primary funding tool for capital expenditure that the Council expects to incur to meet the increased demand for network infrastructure and reserves resulting from growth. It identifies that the Council will apply the Development Contributions Policy rather than financial contributions, except for:

- Crown development (as the Crown is not bound by the development contribution provisions in the LGA); and
- in cases where capital expenditure is required which is not identified in the LTCCP and a financial contribution can be required under section 3.4.5 of the District Plan (in addition to development contributions).

Recently, it has been identified that the District Plan provisions requiring financial contributions to be paid as a condition of permitted activities provide the opportunity for a limited number of developments to avoid the full application of the Development Contributions Policy. Further, the condition could also frustrate the application of the permitted activity rules in the District Plan.

4. Discussion

Under the District Plan, the Permitted Activity Rules in the Residential, Suburban Centre, Institutional Precinct, Airport and Golf Course Recreation Precinct, Central Area, Rural, Open Space, Conservation Site and Utility chapters all are prefaced by the following statement:

"The following activities are permitted in the ... area provided that they comply with any specified conditions and the payment of any financial contributions (refer to rule 3.4)."

This provision requires financial contributions to be paid in order for the permitted activity rules to apply. Failure to pay financial contributions means that the activity would 'default' from the permitted activity rule - even if a development contribution had been imposed and paid.

If a Certificate of Compliance was sought for a permitted activity development and the Financial Contribution under the District Plan paid, the Council would have to accept that payment and accordingly be unable to impose a development contribution for 'that same purpose'. As the financial contribution would be significantly less than the development contribution that would be imposed under the new Development Contribution Policy, the development would only contribute to growth-related capital expenditure to the extent of the financial contribution provisions, rather than at the new and updated contribution required by the Development Contributions Policy.

A hypothetical example of such a scenario is summarised below:

Development in Catchment Area J – Per Unit of Demand		
	Financial Contribution	**Development Contribution**
Reserves - Citywide	$198	$ 409
Traffic - Citywide	$ 303	$ 2391
Stormwater and other Citywide	$ nil	$ 423
Catchment based: • Wastewater • Water	 $ nil $ nil	 $ 722 $ 5720
Total	$ 501	$ 9665

If a financial contribution was paid, this would mean that Council could not impose the development contribution for reserves and traffic, resulting in a shortfall per equivalent house hold unit. It would further result in potential disagreement as to whether the payment of any financial contribution closes the door on payment of any development contribution (not just the contributions payable that have a corresponding financial contribution requirement). While legal advice has confirmed that the first interpretation is correct, the continuation of the current regime may lead to such arguments.

Proposed District Plan Change 51 focuses on ensuring that this 'loophole' is closed so that new development contributes to growth-related capital expenditure under the Development Contributions Policy rather than to the lower contributions required under the District Plan. It also will ensure that the permitted activity rules can operate as intended.

To address this issue, it is proposed to:

- delete any reference to applying Financial Contributions to permitted activities under 3.4 of the District Plan. This would involve deletion of the following words from all chapters:

  "and the payment of any financial contributions (refer to rule 3.4)."

- refer to the Development Contributions Policy within the District Plan by inserting the following wording in the introductory section of the financial contributions provisions:

  "and are distinct from and in addition to the Development Contributions Policy which provides the Council with an alternative method to obtain contributions to fund infrastructure required as a result of growth."

- make a number of other consequential amendments that are also proposed to Section 3.4 (see Appendix One).

These changes will ensure that the Development Contributions Policy can fully perform its role as the primary funding tool. It is considered that the proposed changes give effect to Council's existing policy on funding growth-related expenditure, which has been consulted on widely as part of adoption of the Development Contributions Policy in 2005 and the 2006/07 LTCCP.

It is intended that this plan change be notified citywide along with other plan changes 16 September 2006.

5. Conclusion

Proposed District Plan Change 51 has been proposed to recognise the changes that have occurred in the way in which Council can impose contributions to fund infrastructure required as a result of development growth. The Proposed Plan Change ensures that the General Provisions chapter, specifically section 3.4 which deals with Financial Contributions and the Permitted Activity sections of the various area chapters are clear and precise to enable the correct application of the Development Contribution Policy.

It is recommended that the Committee agrees to publicly notify the proposed plan change in order to assist the smooth functioning of the District Plan and the Development Contribution Policy.

Contact Officer: *Sarah Nelson Policy Advisor - Planning Policy*

Supporting Information

1)Strategic Fit / Strategic Outcome
This proposed District Plan Change recognises the Development Contributions Policy as the principle funding tool to fund infrastructure as a result of growth. The amendments will assist in the correct functioning and intent of the Development Contributions Policy and the District Plan.

2) LTCCP/Annual Plan reference and long term financial impact
Relates to updating the District Plan. Project is part of the District Plan Team budget

3) Treaty of Waitangi considerations
There are no specific Treaty of Waitangi implications

4) Decision-Making
The proposed changes to the District Plan are not significant in that they amend existing provisions that were adopted following required Resource Management Act processes.

5) Pre-Consultation
a) Internal
Planning and Urban Design – Development Contributions
b) External
Ngati Toa & Tenths Trust
Te Runanga o Toa Rangatira Inc
Minister for the Environment
Greater Wellington Regional Council
Department of Conservation

6) Legal Implications
The content, timing and notification of this plan change have been reviewed by the Council's legal advisors.

7) Consistency with existing policy
The Proposed Plan Change is consistent with the Development Contributions Policy and the agreed direction included within the District Plan and wider Council funding and financial policies.

APPENDIX ONE:

PROPOSED DISTRICT PLAN CHANGE 51 - AMENDMENTS TO FINANCIAL CONTRIBUTIONS PROVISIONS

DISTRICT PLAN TEXT – VOLUME 1

3.4 Financial Contributions

3.4.1 Introduction

First paragraph:

In the first and second lines delete the words “on Permitted Activities and”

After the word “objectives” in the last line add the words:

“and are distinct from and in addition to the Development Contributions Policy which provides the Council with an alternative method to obtain contributions to fund infrastructure required as a result of growth.”

Third paragraph:

In the third line delete the words “Permitted Activities or as conditions”

Policies

In the fourth line of the italicised explanatory statement delete the words “conditions on permitted activities or”

3.4.3 Financial Contribution Requirements

Delete all of Section 3.4.3.1 - Council may require development impact fees from Permitted Activities (with consequential renumbering).

3.4.4 Development Impact Fees

In the second line of 3.4.4.1 delete the words “both from Permitted Activities, and”

Chapters 5, 7, 9, 11A, 11B, 13, 15, 17, 19 and 23 - (Residential, Suburban Centre, Institutional Precinct, Airport and Golf Course Recreation Precinct, Central Area, Rural, Open Space, Conservation Site and Utility Permitted Activity Rules)

In all of the above rules in the first paragraph under the heading “Permitted Activities” delete the words *"and the payment of any financial contributions (refer to rule 3.4)."*

ANNOTATED CHAPTERS OF THE OPERATIVE DISTRICT PLAN INCLUDING PROPOSED DISTRICT PLAN CHANGE 51 PROVISIONS

Additions are identified as underlined.

Deletions are identified as ~~struck through.~~

Note:
This annotated version does not form part of the proposed plan change and is included for information purposes to show the plan change proposals in context.

3.4 Financial Contributions

3.4.1 Introduction

The financial contributions provisions in the District Plan deal with conditions imposed ~~on Permitted Activities and~~ land use and subdivision consents. Financial contributions are used as a mechanism for achieving the Plan's objectives <u>and are distinct from and in addition to the Development Contributions Policy which provides the Council with an alternative method to obtain contributions to fund infrastructure required as a result of growth.</u>

In the context of new development the District Plan uses financial contributions to build into the cost of the development any physical, environmental or social costs that can be identified. It does this by ensuring that the developer avoids, remedies, mitigates or compensates for any adverse effects.

Section 108(9) of the Resource Management Act 1991 allows the imposition of a variety of financial contributions to achieve the purpose of the Act. Financial contributions can take several forms and may be imposed as conditions on ~~Permitted Activities or as conditions~~ on a land use or subdivision consent.

In this Plan, financial contributions are used for three reasons:

- to provide a fair and reasonable contribution to finance the extension or development of bulk services or other infrastructure costs as a result of a resource consent or development activity
- to provide a fair and reasonable way to ensure adequate provision of reserves (including esplanade reserves/strips) to meet community needs generated by a development project
- along with other provisions to provide a mechanism to avoid, remedy, or mitigate and/or offset adverse effects on the environment.

The types of financial contribution applying in this District Plan are:

- requiring the payment of development impact fees

  Development impact fees are intended to offset the cost of future capital works and reserves acquisitions necessitated by new development. Fees will vary for different types of development and also between areas in the city.

- requiring payment for the cost of carrying out works off-site that are deemed necessary as a result of the development

  Payment for the cost of off-site works will be required in situations where existing infrastructure needs to be upgraded to cope with new development.

- requiring that land be vested in Council ownership.

  The vesting of land will be required in cases where an esplanade reserve is created, and where such land furthers Council's reserves strategy. Generally land for reserves will be accepted in lieu of fees payable or simply purchased. In certain cases, however, the vesting of land will be required, at a rate in accordance with the fee payable for the reserves impact fee for the area concerned.

This part of the Plan sets out the types of financial contribution which may be imposed as conditions on land use and subdivision consents. In each case it sets out the circumstances in which they are imposed, the method by which they are determined and the maximum amount payable. The actual amount in any one case will be calculated according to the method of calculation in rule 3.4.4.3. A Guide to Development Impact Fees which details fees based on the formulae and current costs is available from Council offices.

3.4.2 Financial Contributions Objectives and Policies

OBJECTIVE

3.4.2.1 To ensure that the costs of servicing development with infrastructure and reserves is included in the cost of development in a fair and equitable manner.

POLICIES

To achieve this objective, Council will:

3.4.2.1.1 Identify within the Plan the method of calculating financial contributions and maximum amounts payable.

3.4.2.1.2 Identify the instances where fees will be imposed to mitigate the impacts of development on city infrastructure and on the wider environment.

3.4.2.1.3 Identify within the Plan the basis for requiring fees, in terms of expected population growth and anticipated services expansion required to service new development.

3.4.2.1.4 Identify within the Plan the uses to which any funds collected may be applied.

METHODS

- Rules
- Other mechanisms (Guide to Development Impact Fees)

It is Council policy that the full costs of all developments are faced by the applicant, including impacts on traffic flows, reserves, drainage, sewerage, water supply and the natural environment. For this reason financial contribution mechanisms have been developed to remedy or mitigate internal and external site effects. Financial contributions may be ~~conditions on permitted activities or~~ conditions on resource consents.

The results will be the setting and collection of financial contributions from development that represent a fair share of the cost of servicing that development with infrastructure and reserves.

3.4.3 Financial Contribution Requirements

~~**3.4.3.1 Council may require development impact fees from Permitted Activities.**~~

~~Where an activity is classed as a Permitted Activity in this Plan, it is only a Permitted Activity subject to the meeting of any financial contributions which the Council may impose in accordance with the policies, rules, and maximums specified in sections 3.4 to 3.4.6.~~

~~RESIDENTIAL ACTIVITIES: erection or creation of household units~~	~~Development impact fees are required when an additional household unit is created, for example, when an additional house is built, or an existing one divided into flats. No contribution is required for the first household unit created.~~ • ~~development impact fees may be up to the amounts listed under 3.4.4.9 for each additional household unit for each service type (which may include water, traffic, sewers, stormwater and reserves). Details of exact fees applying in different areas are contained in the Guide to Development Impact Fees, available from the Council.~~
~~NON-RESIDENTIAL ACTIVITIES: Central~~	~~Financial contributions are required in respect of any permitted commercial developments involving an increase to the gross floor area of~~

~~Area, Suburban Centres~~	~~more than 50m^2.~~ • ~~development impact fees may be up to the amounts listed in rule 3.4.4.9 per 100m^2 gross floor area, for each service type (which may include water, traffic, sewers, stormwater and reserves). Details of exact fees applying in different areas are contained in the Guide to Development Impact Fees, available from the Council.~~
~~SUBDIVISION:~~	~~Where subdivisions meet the conditions for Permitted Activities, no financial contributions are required.~~

3.4.3~~.2~~.1 Activities Requiring Resource Consent

Council may impose conditions on a resource consent requiring one or more financial contributions in accordance with the policies, rules and maximums specified in sections 3.4 to 3.4.6.

LAND USE ACTIVITIES: conditions of consent	Financial contributions may be required as a condition of consent for any activities. The financial contributions are: • development impact fees which may be up to the amounts listed in rule 3.4.4.9 per 100m^2 of gross floor area for each service type (which may include water, traffic, sewers, stormwater and reserves). (See Guide to Development Impact Fees available from Council offices) • development impact fees which may be up to the amount listed in rule 3.4.4.9 for each household unit, additional household unit or allotment for each service type (which may include water, traffic, sewers, stormwater and reserves). (See Guide to Development Impact Fees available from Council offices) • payment for the full costs of off-site works necessary to improve or upgrade infrastructure at the point of connection to ensure the new development connects safely and adequately to existing networks (see rule 3.4.5) • the creation and vesting of an esplanade reserve and/or the creation of an esplanade strip (see rule 3.4.6) • the vesting of any specific land required, determined in accordance with the value of the land and the rate of impact fee applying.
SUBDIVISION: conditions of consent	Financial contributions may be required as a condition of consent for any subdivision. The financial contributions are: • development impact fees which may be up to the amount listed in rule 3.4.4.9 for each household unit, additional household unit or allotment for each service type (which may include water, traffic, sewers, stormwater and reserves). (See Guide to Development Impact Fees available from Council offices) • payment for the full costs of off-site works necessary to improve or upgrade infrastructure at the point of connection to ensure the new development connects safely and adequately to existing networks (see rule 3.4.5)

	• the creation and vesting of an esplanade reserve and/or the creation of an esplanade strip (see rule 3.4.6) • the vesting of any specific land required, determined in accordance with the value of the land and the rate of impact fee applying.

3.4.4 Development Impact Fees

This section specifically relates to developer contributions towards infrastructural and utility services, reserves and facilities owned and/or operated by Wellington City Council.

3.4.4.1 The Council may require the payment of development impact fees as a financial contribution, ~~both from Permitted Activities, and~~ as a condition on consents.

Development impact fees are imposed to cover a fair share of expected costs of expansion of services necessitated by new development. The fees apply in relation to stormwater, sewer, water, traffic and reserves. Development impact fees are calculated for each area by aggregating expected service expansion costs attributable to forecast new development, and apportioning them per unit of new development. In the case of residential development, the unit is the household unit or allotment. For non-residential development, fees are applied per $100m^2$ gross floor area. The application of the fees to non-residential development is limited to those developments which involve additional gross floor area of $50m^2$ or more.

Fees may be required from development activities in advance of the Council undertaking services expansion (generally no more than five years in advance) and after completion of services expansion, to recoup costs.

Where a development does not contribute to the need for expansion of a particular service, then the relevant impact fee will not be charged.

This Plan sets out the policies, principles, methodology and maximums for the development impact fees. The exact fees applying in different areas are contained in a separate *Guide to Development Impact Fees*. The figures in this guide are subject to the policies, principles, methodology and maximums in this Plan.

The Residential, Suburban Centre, Institutional Precinct, Airport and Golf Course Recreation Precinct, Central Area, Rural, Open Space, Conservation Site and Utility Permitted Activity Rules

The Residential, Suburban Centre, Institutional Precinct, Airport and Golf Course Recreation Precinct, Central Area, Rural, Open Space, Conservation Site and Utility Permitted Activity Rules all are prefaced by the following statement:

" The following activities are permitted in the … area provided that they comply with any specified conditions and the payment of any financial contributions (refer to rule 3.4)."

The proposed District Plan change is to delete the words *"and the payment of any financial contributions (refer to rule 3.4)."*

For example:

5. RESIDENTIAL RULES

5.1 Permitted Activities

The following activities are permitted in Residential Areas (which includes the Inner and Outer Residential Areas as shown on the planning maps) provided that they comply with any specified conditions. ~~and payment of any financial contribution (refer to rule 3.4).~~

Where Inner Residential Areas are situated within the Central Area Boundary as defined on the planning maps, the relevant Residential objectives, policies and rules will apply to those Inner Residential Areas.

APPENDIX TWO:

SECTION 32 REPORT

PROPOSED DISTRICT PLAN CHANGE 51

AMENDMENTS TO FINACIAL CONRIBUTION PROVSIONS

1. Introduction

Before a proposed District Plan change is publicly notified the Council is required under section 32 of the Resource Management Act 1991 (‘RMA’) to carry out an evaluation of the proposed change and prepare a report. As prescribed in section 32 of the Act:

An evaluation must examine:

(a) the extent to which each objective is the most appropriate way to achieve the purpose of the Act; and
(b) whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.

An evaluation must also take into account:

(a) the benefits and costs of policies, rules, or other methods; and
(b) the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules or other methods.

Benefits and costs are defined as including benefits and costs of any kind, whether monetary or non-monetary.

A report must be prepared summarising the evaluation and giving reasons for the evaluation. The report must be available for public inspection at the time the proposed change is publicly notified.

The Plan Change seeks to make amendments to the General Provisions chapter, specifically section 3.4 which deals with Financial Contributions and the Permitted Activity sections of the various area chapters, to assist with interpretation and the efficient function of the District Plan.

2. Context

The purpose of the RMA is to promote the sustainable management of natural and physical resources. Sustainable management includes managing the use and development of natural and physical resources to enable people to provide for *their social, economic, and cultural wellbeing and for their health and safety*. The Act also contains an explicit function for Territorial Authorities to maintain and enhance amenity values and the quality of the environment. The District Plan is the primary vehicle for achieving these purposes. It provides for the management of activities in the Wellington City District through objectives, policies and rules. To continue promoting the sustainable management of resources over time, it is necessary to amend the District Plan and respond to changes in environmental, social, economic, legislative and cultural circumstances. The process which led to the development of this Plan Change was initiated in response amendments to the Local Government Act 2002 (‘LGA’), which allows for Councils to impose development contributions to help fund infrastructure as a result of growth

3. Process & Consultation

The establishment of the RMA brought about the introduction of financial contributions which are aimed to promote the sustainable management of natural and physical resources in terms of section 5 of the RMA. However, this resource-based focus has created problems and has restricted local authorities’ ability to promote other social, economic and cultural policy objectives.

The limitations of the financial contribution regime was recognised as part of the Local Government reforms. When the Local Government Act was enacted in 2002 it provided Council with the ability to impose development contributions to allow for the recovery of infrastructure and service costs relating to growth. If a local authority elects to use development contributions, it is required to prepare and adopt policy on development contributions as a component of its funding and financial Policies in its Long Term Council Community Plan (“LTCCP”). This Council's Development Contributions Policy was adopted 28 June 2005, with the Policy effective from 1 July 2005.

This new Policy is now seen as the primary funding tool and in response to this, amendments are needed to section 3.4 of the District Plan which deals with Financial Contributions and the Permitted Activity rules of the various area chapters. These changes will assist with interpretation and the efficient function of the District Plan. In addition, the Plan Change will close the opportunity for developers or landowners to circumvent the Policy through the use of Certificates of Compliance.

Specific consultation was undertaken with statutory agencies as required under Clause 3 of Schedule 1 of the Resource Management Act 1991 (RMA). This involved:

- Ministry for the Environment
- Tenths Trust (Te Atiawa)
- Te Runanga O Toa Rangatira Inc
- Greater Wellington (Regional Council)
- The Department of Conservation

4. Appropriateness of Objectives

Section 32 requires the Council to be satisfied that the objectives of the District Plan are the most appropriate means of achieving the purpose of the RMA. Proposed District Plan Change 51 does not change any of the objectives in the District Plan.

5. Appropriateness of Policies, Rules and Other Methods

Section 32 also requires the Council to consider whether the policies, rules and other methods used in the District Plan are the most appropriate methods of achieving the Plan's objectives.

The Table below assesses the efficiency, effectiveness and appropriateness of the proposed plan change. Option 1, retaining the status quo, would not be an appropriate means to achieve the intent of the new Development Contributions Policy. Retaining the status quo will enable landowners and developers to take advantage of the 'loophole' and seek a Certificate of Compliance for a permitted activity, paying a much lower financial contribution under the District Plan rather than paying the correct development contribution in line with the intent of the Development Contribution Policy and the actual effects of the development. The economic cost would be great, with the loss in revenue in turn impacting on social/cultural and environmental outcomes.

Option 2, the Proposed District Plan Change is recommended because it is considered to be the most efficient and effective way to manage monetary contributions, with the best outcome in terms of the costs and benefits at the environmental, social/cultural and economic levels.

Matrix of Options for the Proposed District Plan Change 51

	OPTION 1: Status Quo Maintain existing provision for option of payment of financial contribution on permitted activities This option is NOT RECOMMENDED.	OPTION 2: Amend District Plan as proposed Notify a district plan change to amend existing policies and rules in the General Provisions chapter, section 3.4 and the Permitted Activity rules of the various area chapters This is the RECOMMENDED option.
Costs	Environmental costs – May limit Councils ability to achieve positive environmental outcomes sought via Development Contribution Policy. May limit Councils ability to negotiate positive environmental outcomes in leiu of monetary contributions i.e. green corridors, riparian strips. Economic costs – Council maybe unable to recoup the cost of funding network infrastructure, community infrastructure and reserves as a result of growth related expenditure. Public potentially to pay debt through rates increase Social costs – potential for community to be unsatisfied with planning outcomes and level of infrastructure provided	Environmental costs - unlikely Economic costs – Developers and landowners are faced with potentially weightier contributions which could lead to development delays or last opportunity costs. Social costs – May increase the cost of some developments which are likely to be imposed on consumers.
Benefits	Environmental benefits – no change Economic benefits – Developers can circumvent Development Contribution Policy through the use of a Certificate if Compliance potentially paying less contribution. Social benefits – reduced development costs may translate into lower cost developments and services which could be passed onto consumers	Environmental benefits – Sustainable management of network infrastructure, community infrastructure and reserves in line with Local Government Act 2002 and Resource Management Act. Potential to negotiate positive environmental outcomes in leiu of monetary contributions. Economic benefits – Council is able to gather appropriate revenue levels to help fund capital expenditure as a result of growth. Avoids Council imposing rates serviced debt with the cost of growth spread equitably. Social benefits – Public assurance infrastructure will continue to be provided and maintained. Existing residents are not paying for newcomers facilities.

Efficiency and Effectiveness of achieving Objectives	The intent of the Plan's objectives cannot be efficiently nor effectively achieved	Most efficient and effective in achieving the Plan's objectives and improves the smooth functioning of the District Plan
Most appropriate for achieving Objectives	Not considered appropriate as developers can circumvent Development Contribution Policy through the use of a Certificate of Compliance via District Plan rules	Appropriate, because proposed amendments to the District Plan complement the Development Contributions Policy.