

Property Council New Zealand

Submission on

Christchurch City Council's Development contributions rebate schemes consultation

14 July 2025

For more information and further queries, please contact
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Christchurch City Council's Development contributions rebate schemes consultation

1. Summary

- 1.1 Property Council New Zealand South Island Region Branch ("Property Council") welcomes the opportunity to provide feedback on Christchurch City Council's ("the Council") Development contributions rebate schemes consultation.
- 1.2 Property Council supports development contribution rebate schemes. Development rebates can provide incentives to stimulate economic development. However, rebate schemes should be appropriately tailored by individual councils in conjunction with the local development community to better align council expectations with local developer knowledge and likelihood of uptake. We have recommended some changes to the proposed schemes to better ensure uptake from the development community in Christchurch.

2. Recommendations

- 2.1 At a high level, we recommend that Christchurch City Council:
 - Extend Scheme 1 to include vacant sites;
 - Does not limit funding for Scheme 1;
 - Extend the expiry date to a five-year period for Scheme 1;
 - Amend Scheme 2 to allow for three or more storey residential buildings to be eligible;
 - Does not limit funding for Scheme 2;
 - Extend the expiry date to a five-year period for Scheme 2; and
 - Engage in good faith with individuals managing the expiration of development contribution credits to facilitate a more appropriate solution.

3. Introduction

- 3.1. Property Council is the leading not-for-profit advocate for New Zealand's most significant industry, property. Our organisational purpose is, "Together, shaping cities where communities thrive".
- 3.2. The property sector shapes New Zealand's social, economic and environmental fabric. Property Council advocates for the creation and retention of a well-designed, functional and sustainable built environment, in order to contribute to the overall prosperity and well-being of New Zealand.
- 3.3. Property is the largest industry in Canterbury. There are around \$245.5 billion in property assets across Canterbury, with property providing a direct contribution to GDP of \$4.5 billion and employment for 34,860 Canterbury residents.

- 3.4. We connect property professionals and represent the interests of 149 Canterbury based member companies across the private, public and charitable sectors.
- 3.5. This document provides Property Council's feedback on [Christchurch City Council's Development contributions rebate schemes consultation](#). Comments and recommendations are provided on issues relevant to Property Council's members.

4. General

- 4.1. In the aftermath of the 2010 and 2011 earthquakes, Christchurch has been on a long road to recovery. Rebate schemes serve as a vital tool for incentivising development in areas where growth is essential for the city's recovery and long-term prosperity.

5. Scheme 1: Existing demand credits in the central city rebate scheme

- 5.1. The proposed scheme is for any development within the Four Avenues of the central city where the existing structure was in place on the lot on or after 1 March 2024. Property Council members are supportive of this proposed application area.

Extension to vacant sites

- 5.2. Members are also supportive of this scheme including vacant sites. Vacant sites within the central city are equally important to the urban regeneration process as properties with existing buildings. By supporting development on vacant sites, we can ensure that applicable land within the Four Avenues has the potential to contribute to Christchurch's vibrancy.

Funding limit

- 5.3. The scheme proposes a funding limit of \$5 million, with a maximum of \$1 million for a single development. The proposed scheme will either expire on 30 June 2027 or when the total scheme funding is fully allocated. Introducing funding limits create uncertainty in the market around eligibility. Furthermore, development is a long-term game and is not rushed into. Having an expiry date of 2027 will realistically only benefit existing development projects in the pipeline. If the goal is to encourage redevelopment in the central city, then we recommend there be no limit on the amount of funding and the expiry date is extended to a five-year period or beyond.
- 5.4. Additionally, the policy overlooks the economic benefit of the ongoing rates income that developed sites will generate for the Council in the future. The revenue from these sites would be a significant and continuous source of income, which should be factored into the funding considerations.

6. Scheme 2: Six-story residential development in the central city rebate scheme

- 6.1. The proposed scheme is for any residential development within the Four Avenues of the central city. The residential development, or residential component, must comprise

of at least six storeys. Property Council members are supportive of this proposed application area.

- 6.2. Property Council members consider the minimum requirement of six storeys is not representative of the current central city landscape. Given the limited demand for buildings of that height, and feasibility concerns, our members recommend a minimum of three storeys instead. This will better encourage a range of housing heights and typologies.

Funding limit

- 6.3. A funding limit create uncertainty around eligibility. As per our previous comments, we do not recommend imposing a cap on the amount of funding available. We also recommend that the expiry date of this scheme is extended to a five-year period or beyond.

7. Expiry of development contribution credits

- 7.1. While we broadly support the proposed initiatives, our members have expressed concern about the expiry of development contribution credits. We recommend the Council engage in good faith with individuals managing the expiration of development contribution credits to facilitate a more appropriate solution. We will leave this for our members who are impacted to make individual comments on the expiry of development contribution credits.

8. Conclusion

- 8.1. Property Council supports the extension of Scheme 1 to include vacant sites, as this will help unlock underutilised land within the Four Avenues. However, to increase uptake among developers, Scheme 2 should lower the minimum height requirement to three storeys. This adjustment would better align with the current development landscape and market realities in central Christchurch.
- 8.2. Property Council members invest, own, and develop property in Christchurch. We wish to thank Christchurch City Council for the opportunity to submit on Christchurch City Council's Development contributions rebate schemes consultation as this gives our members a chance to have their say in the future of our city. **We also wish to be heard in support of our submission.**
- 8.3. Any further enquires do not hesitate to contact Sandamali Ambepitiya, Advocacy Advisor, via email: sandamali@propertynz.co.nz or cell: 0210459871.

Yours sincerely,



Leonie Freeman
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