Te Kaunihera o Te Hiku o te Ika
Far North District Council

HE ARA TĀMATA
CREATING GREAT PLACES
Supporting our people

Utu Whakawhanke Development Contributions Policy 2025 – Proposed Amendments

Supporting Report

Attachment 1

Executive Summary

This report recommends a focused package of amendments to the Utu Whakawhanake Development Contributions Policy 2025 (Policy) to resolve implementation issues, improve clarity, and address minor drafting errors. Through the implementation planning phases, that included internal and external enquiries and general feedback five main areas for Policy change have been identified:

- Making the reconsideration process workable within the statutory 15-working day timeframe
- Improving equity and clarity in the credit provisions
- Correcting minor terminology and cross-reference issues, and
- Technical amendments (grammar, spelling, typographical, and format errors).

Amendments to clause 28.3 replace the current public Council Meeting pathway with a delegated officer panel (that can refer significant matters to a commissioner). This amendment ensures that reconsiderations can be determined efficiently and within the legal timeframe and while preserving written reasons for transparency and objection rights.

Changes to clauses 17.8, 18.1, and 18.8 separate HUE calculation from credit allocation, harmonise terminology, recognising 224(c) Resource Management Act 1991 (RMA) certificates to avoid inequity from LINZ title delays, and strengthen cross-referencing between calculation and credit provisions for both residential and non-residential development. Technical corrections across headings, definitions and clause references improve readability and ensure the operative Policy, schedules, and explanatory material form a coherent framework without altering the underlying charging methodology or funding settings already consulted on and adopted.

Overall, the amendments are low-risk, high-value changes that enhance clarity, operational workability, Council decision and statutory alignment without changing who pays or how much. Staff propose a proportionate three week consultation process, under section 82 of the Local Government Act 2002 that is consistent with Council's Significance and Engagement Policy and the procedural and technical nature of the changes.

If adopted after consultation, the amendments will support a more reliable administration of the Policy, improve assessment consistency, reduce the likelihood of reconsideration requests and objections, and enhance transparency, useability, and certainty for all Policy users.

1. Purpose

To provide the statutory and policy rationale for amending the Policy to address inconsistencies, implementation issues, and minor drafting errors. The amendments are intended to improve clarity, administrative efficiency, and fairness in the application of development contributions, and credits.

2. Context and Situation

On 7 October at an Extraordinary Meeting, Council adopted its Utu Whakawhanake Development Contributions Policy 2025 and resolved to delay commencement until May 2026 (resolution ref 2025/136). The Policy consulted on under the Local Government Act 2002 (LGA) provides a fair transparent mechanism for funding growth-related infrastructure in the Far North District.

At its adoption, Council decided to commence the Policy in May 2026 to align with anticipated Proposed District Plan decisions, which are now expected in mid to late June 2026.

In combination of the anticipated decisions for the Proposed District Plan being delayed, and after considering a report presented to Council at its meeting held on 1 April 2026, Council have now decided to extend the May Policy commencement date to 1 July 2026. The Policy has been updated to reflect this decision.

The Policy applies to resource consent, building consents and service connection requests lodged on or after the operative date within the catchment areas.

Implementation work in preparation of operationalising the Policy began on 24 November 2025, supported by a structured programme covering process design, governance, communications, and system requirements. Public inquiries, internal feedback, and operational testing have together indicated the following areas of the Policy that require amendment:

- **Statutory compliance:** clause 28.3(b) which covers the reconsideration process is not workable within the 15-working day reconsideration timeframe.
- **Equity and implementation:** the current credit wording may disadvantage applicants whose titles are delayed by Land Information New Zealand (LINZ) after Council approval.
- **Technical corrections:** minor typographical and cross-reference issues require correction.

3. Statutory Requirements for amending the Utu Whakawhanake Development Contributions Policy 2025

The proposed amendments are limited to non-material drafting changes, grammatical corrections, and wording updates to better align the Policy with the LGA. They do not alter the policy intent, charging methodology, schedule of contributions fee, or underlying right to seek reconsideration or objection. **Table 1** sets out the relevant LGA requirements Council must satisfy to lawfully amend the Policy.

Table 1: Applicable LGA requirements for amending the Utu Whakawhanake Development Contributions Policy 2025.

LGA Section	Title / Content	Requirement for Policy Amendment
s102(4)(b)	Amending funding and financial policies	Enables Council to amend its financial policies adopted under section 101(2) LGA. Council may amend its development contributions policy at any time, provided it first consults using a process that gives effect to section 82 LGA
s82 as directed by s103(4)(b)	Consultation requirements	Enables Council's discretion to ensure efficient use of Council resources. Considerations when using discretion: • known community views, • ability for public to provide their views • prudent use of Council resources

		• significance of decision in alignment with its significance and engagement policy • engagement material is clear about the scope of the consultation and feedback sought

4. Proposed Policy Amendments

a. Reconsideration process

Issue identified:

Clause 28.3, (**Table 2**) in its current form, is not operationally feasible because reconsiderations must be determined within 15-working days under the Act.

Table 2: Proposed Reconsideration Process Amendment

Affected clause	Current wording	Proposed amendment
28.3	Council will take the following steps: a. Council will review the original assessment and prepare a report that will include, but is not limited to, consideration of the following matters: i. the grounds on which the request for reconsideration was made, including any new information provided; ii. the purpose and principles of development contributions under ss197AA and 197AB LGA; iii. the provisions of the Policy; iv. any other relevant matters. b. the reconsideration request and report will be provided as part of an agenda report for a public meeting of the Council with the relevant delegations and Terms of Reference to consider the request. c. Council will consider the information provided and will make a decision. d. the Council will, in accordance with s199B LGA, notify the person of the outcome of the reconsideration within 15-working days after the day it receives all required information in relation to the request.	Where a person requests a reconsideration under clause 28.1: a. Council will review the development contribution requirement in accordance with clause 28.2; b. the reconsideration request will be determined by a panel of 3 suitably delegated officers that may or may not include the Chief Executive in accordance with Council's Delegations Register; c. In making a determination under clause 28.3.b, the panel will have regard to the information provided by the requester, the original assessment, the requirements of this Policy, and any relevant technical or legal advice; d. Council will notify the person who requested the review in writing of its decision within 15-working days of receiving the request, unless clause (e) applies, including reasons for the decision and information on the right to object under clause 29; and e. The panel may, at its discretion, refer any reconsideration to a commissioner, for determination if the matter raises significant policy interpretation, precedent, or public interest issues.

Rationale for proposed amendment:

The current requirement for reconsiderations to be determined by Council at a public Council meeting is not workable within the 15-working day statutory timeframe under section 199A LGA. Council meetings are usually held monthly. Public notice, agenda preparation, and meeting schedule would often exceed

the statutory reconsideration decision deadline. This exposes Council to legal risk and poor service delivery.
The amended approach:

- Delegates routine reconsideration decisions to a qualified panel of delegated officers, which may or may not include the Chief Executive. This provides flexibility to resource the process, and meet statutory timeframes.
- Strengthens transparency and accountability through independent decision-making. This improves Council's legal position and may reduce resource intensive objections.
- Supports statutory compliance
- Provides written reasons and preserves an objection right under clause 29 of the Policy
- Aligns with standard administrative practice for technical assessment decisions.

Amendment impact:

The amendments would streamline the process by removing unnecessary procedural steps and setting out a clear delegated officer panel pathway. This should make the process more workable for staff, improve consistency in decision-making, and help Council meet the 15-working day notification timeframe more reliably.

The amendments also preserve the integrity of the Policy, by allowing the delegated officer panel to refer matters with significant policy, precedent, or public interest implications to a commissioner for independent and impartial determination.

Overall, the changes improve clarity, accountability, and statutory alignment without changing the underlying right to seek a reconsideration.

5. Equity and Implementation

a. Clause 17.8.a.iv - Residential Subdivision Credits

Issue identified:

Clause 17.8.a.iv (**Table 3**) currently creates structural inconsistency. It places credit criteria within the HUE calculation methodology section, which duplicates and may conflict with the credit framework in Clause 18.

Table 3: Proposed Equity and Implementation Amendments

Affected clause	Current wording	Proposed amendment
17.8.a.iv	**iv.** The first single dwelling unit built on a vacant lot with a registered title in existence prior to 1 July 2026 will be assessed as having a credit of one HUE.	**iv.** The first single dwelling unit built on an allotment with a registered title, or for which a certificate under section 224(c) of the RMA has been issued, prior to 1 July 2026, development contributions will be calculated in accordance with the credit provisions in clause 18.8.a.i, which provides one HUE credit per Activity for undeveloped lots.

Rationale for proposed amendment:

- Separates HUE calculation methodology (Clause 17) from credit assessment framework (Clause 18), creating clear functional boundaries and a single source of truth for credit determinations.
- Eliminates duplication between clause 17.8.a.iv and 18.8.a.i, ensuring consistent application of the credit section across all residential development scenarios.

- Addresses termination consistency. Replaces ‘vacant lot’ with ‘allotment’ (defined in clause 12.1 and consistent with RMA s218(2)) and uses “undeveloped allotments’ consistently with clause 18.8.a.i.
- Recognises s224(c) RMA certificates issued prior to 1 July 2026 to ensure equity for developers who have completed the Council approval pathway, but whose titles have not yet been registered by Land Information New Zealand (LINZ). This prevents credit entitlement being lost due to title registration timing beyond the developer’s control.
- Improves statutory alignment by clearly articulating the relationship between calculation and credit provisions
- Provides clear cross-referencing that reduces assessment errors and potential grounds for reconsideration (s199A LGA) or objection (s199D LGA)

Amendment impact

The amendment maintains the Policy’s intent with the outcome remaining unchanged. Pre-existing titled allotments and allotments issued with s224(c) RMA certificates issued prior to 1 July 2026 receive one HUE credit per Activity for the first dwelling. This ensures equitable treatment regardless of LINZ registration timing.

The amendment also supports the objection and reconsideration framework by creating clearer cross-referencing between calculation methodology (clause 17) and credit provisions (clause 18). The amendment also reduces potential grounds for objections under 199D(1)(a) LGA (incorrect calculation or assessment) by making the Policy more transparent and internally consistent.

b. Clause 18.1.b - Credits Framework

Issue identified:

Clause 18.1.b (**Table 4**) uses inconsistent terminology (‘vacant land’) and lacks clear cross-referencing to the detailed provisions in clauses 18.8.a.i and 18.8.b.i, creating potential ambiguity about application of historical credits.

Table 4: Proposed Credits Framework Amendment

Affected clause	Current wording	Proposed amendment
18.1.b	b. historical credits of one HUE per Activity on vacant land with a registered title at 1 July 2026	b. historical credits of one HUE per Activity on ~~vacant land with a registered title as at 1 July 2026~~ undeveloped allotments with a registered title, or for which a certificate under section 224(c) of the RMA was issued prior to 1 July 2026, as detailed in clauses 18.8.a.i and 18.8.b.i

Rationale for proposed amendment:

- Rectifies inconsistent terminology by replacing ‘vacant land’ with ‘undeveloped allotments’ to align with terminology used throughout clauses 18.8.a and 18.8.b, ensuring consistent interpretation
- Adds cross-references to clauses 18.8.a.i and 18.8.b.i, guiding Policy users to the detailed provisions that operationalise historical credits for both residential and non-residential development
- Recognises s224(c) RMA certificates issued prior to 1 July 2026 to ensuring developers who have complete subdivision approval processes are not disadvantaged by LINZ title registration delays beyond their control. This promotes equity and removes an arbitrary distinction based on administrative timing
- Improves transparency and policy comprehension
- Provides clear cross-referencing to reduce the potential for incorrect assessment errors, lowering the likelihood of reconsideration requests.

c. Clause 18.8.a - Residential Credits

Issue identified:

Clause 18.8.a.i (**Table 5**) uses inconsistent terminology ('existing lot'), has unclear exception ('unable to be built on'), and clause 18.8.a.i appears truncated in the Policy.

Table 5: Proposed Residential Credits Amendment

Affected clause	Current wording	Proposed amendment
18.8	**a. Residential** i. Any undeveloped existing lot with a registered title as at 1 July 2026 is deemed to have one HUE credit per Activity for which a development contribution would otherwise be required, except for: • small road severances; or • titles that are unable to be built on. ii. Where a cross lease or unit title is converted into 'Fee Simple' title, no additional development contributions will be required if the conversion does not increase demand for Council infrastructure.	**a. Residential** i. Any undeveloped allotment ~~existing lot~~ with a registered title, or for which a certificate under section 224(c) RMA was issued prior to ~~as at~~ 1 July 2026, is deemed to have one HUE credit per Activity for which a development contribution would otherwise be required, except for: • small road severances that are not intended for development; or • ~~titles~~ allotments that cannot be lawfully ~~that are unable to~~ be built on due to physical constraints, legal restrictions, or planning provisions. ii. Where a cross lease or unit title is converted into 'Fee Simple' title, no additional development contributions ~~will be~~are required provided ~~if~~ the conversion does not create additional residential capacity beyond what was lawfully established prior to 1 July 2026. ~~increase demand for Council infrastructure.~~

Rationale for proposed amendment:

- Rectifies inconsistent terminology by replacing 'undeveloped existing lot' with 'undeveloped allotment' to align with terminology used throughout clauses 18.8.a and 18.8.b, ensuring consistent interpretation
- Recognises s224(c) RMA certificates issued prior to 1 July 2026 to ensure developers who have complete subdivision approval processes are not disadvantaged by LINZ title registration delays beyond their control. This promotes equity and removes an arbitrary distinction based on administrative timing
- Expands the exceptions to clearly define what constitutes an allotment that cannot be built on, including:
  - Physical constraints (e.g., steep slopes, flooding, contamination)
  - Legal restrictions (e.g., covenants, easements)
  - Planning provisions (e.g., zoning, minimum lot size requirements)
- Clarifies Cross Lease/Unit Titles by explaining that conversions without additional capacity do not trigger development contributions and brings the clause in alignment with the fundamental principle that credits reflect existing lawful use.
- Enhances fairness and equity by clearly articulating when credits apply, and defining when exceptions prevent credit recognition
- Assists with administering the Policy by providing clear exceptions to reduce the need for case-by-case interpretation and minimise reconsideration requests.

d. Clause 18.8.b – Non-Residential Credits

Issue identified:

Clause 18.8.b.i (**Table 6**) contains the same terminology and clarity issues identified above in clause 18.8.a.i and does not provide sufficient guidance for crediting partially developed non-residential allotments creating risk of inconsistent and inequitable application.

Table 6: Proposed Non-Residential Credits Amendment

Affected clause	Current wording	Proposed amendment
18.8.b	**b. Non-residential** i. Any undeveloped lot with a registered title as at 1 July 2026 is deemed to have one HUE credit per Activity for which a development contribution would otherwise have been required, except for: • small road severances; or • titles that are unable to be built on. ii. For developments involving extensions or demolition and rebuilding at the same or higher intensity, credits will be assessed based on the pre-existing development 25 26 iii. Sites where buildings were demolished or destroyed prior to 1 July 2026 will be treated as vacant lots for the purpose of credit allocation.	**b. Non-residential** i. Any undeveloped ~~lot~~allotment with a registered title, or for which a certificate under section 224(c) RMA was issued prior to ~~as at~~ 1 July 2026, is deemed to have one HUE credit per Activity for which a development contribution would otherwise have been required, except for: • small road severances that are not intended for development; or • ~~titles~~ allotments that cannot lawfully ~~are unable to~~ be built on due to physical constraints, legal restrictions, or planning provisions. ii. For the purpose of clause 18.8.b.i "undeveloped allotment' means an allotment with no existing non-residential buildings or lawfully established non-residential activity prior to 1 July 2026.~~developments involving extensions or demolition and rebuilding at the same or higher intensity, credits will be assessed based on the pre-existing development 25 26~~ iii. Credits for non-residential development are calculated based on GFA of existing lawful non-residential buildings on the allotment as at 1 July 2026, using the demand factors in Tables 1-4 (clause 20). Sites where buildings were demolished or destroyed prior to 1 July 2026 will be treated as vacant lots for the purpose of credit allocation.

Rationale for proposed amendment:

- Aligns non-residential credit provisions with the improved residential provisions in 18.8.a, ensuring consistency across development types as required by s197AB(d) LGA (fairness principle)
- Uses "undeveloped allotment' consistently with residential provisions and policy wide usage

- Provides identical exception framework to residential credit, ensuring equitable treatment and reducing administrative complexity
- Adds an explicit definition of 'undeveloped allotment' for non-residential purposes, addressing potential ambiguity about partially developed sites
- Adds a new provision clarifying how credits are calculated for allotments with existing non-residential building, filling a gap in the current Policy and ensuring consistency with clause 17.8.e (non-residential land use assessment).
- Links credit calculation to the demand factor tables in clause 20, ensuring transparency and consistency between new development assessment and credit recognition
- Enhances compliance with Schedule 13, clause 2(2) of the LGA (units of demand) by clarifying how existing non-residential demand is measured for credit purposes
- Reduces ambiguity in assessing partially developed non-residential sites, minimising disputes and reconsideration requests.

Amendment Impact

The proposed amendments will improve assessment consistency, reduce interpretation disputes, and support more transparent and equitable decision-making. They also give Council staff a clearer basis for calculating credits by linking the provision to the demand factor tables and defining the treatment of undeveloped allotments more precisely.

6. Technical Corrections

Issues Identified:

Minor errors that do not alter the operative intent or effect of the Policy (grammar, 'typos', and cross-reference mistakes) have been identified (**Table 7**) and should be corrected to ensure consistency across the Policy's form.

Table 7: Proposed Technical Corrections Amendments

Affected clause / location	Current wording	Proposed amendment	Effect
14.1 Heading text	"Activities for which a development contributions fees are charged"	Activities for which a development contribution fee~~s are~~ is charged	Corrects grammar. No change in meaning
19 Heading	Development Contributions Fees Schedule	Development Contributions Fee~~s~~ Schedule	Aligns heading with usage. No operative effect
Definition – Capital Expenditure	…constriction costs of eligible infrastructure	constru~~i~~ction costs of eligible infrastructure'	Corrects spelling. No change to scope of capex.
Definition – Dwelling unit	A Dwelling Unity may be part of a larger building…	A Dwelling Unit~~y~~ may be part of a larger building…	Typo only
Definition – Retail activity	…ancillary activity to the retain activity…	…ancillary activity to the retail~~n~~ activity…	Typo only
17.8.b.iii	…as per clause 17.8.b.ii17.8.b.ii above.	…as per clause 17.8.b.ii~~17.8.b.ii~~ above.	Fixes duplicated cross-reference
17.8.c.ii	…charges for non-residential land use (clause 17.8.d.i18.8.b).	…charges for non-residential land use (clause~~s~~ 17.8.~~ed.i~~ and 18.8.b).	Correct cross-reference to the actual non-residential clauses. No change to intent

Rationale for proposed amendments:

- Improves clarity and transparency so the Policy is easier for the public and staff to understand and apply
- Reduces ambiguity and the risk of inconsistent interpretation or application
- Ensures the operative clauses, fees schedule, methodology, and explanatory notes all align
- Supports sound administration and helps protect the Council's position if decisions are challenged
- Keeps the published Policy accurate

Amendment Impact:

These technical amendments are low-risk, high-value changes. Their main impact is to improve clarity, consistency, and transparency so the Policy is easier to apply correctly by staff and easier to understand by developers and public Policy users.

In practical terms, they align the operative clauses, fee schedule, methodology, and explanatory notes so the Policy reads as one coherent framework, which reduces ambiguity and the risk of inconsistent interpretation or avoidable disputes. They also strengthen legal defensibility and protect the public record by correcting obvious drafting errors without changing the Policy's underlying charging intent.

7. Proposed Policy Amendments Consistency Analysis

The following tables (**Tables 8 and 9**) are designed to provide a clear quick reference audit trail of each proposed clause amendment (discussed previously in this report) to ensure consistency, and policy coherence. The tables demonstrate, in a single place, how the proposed amendments align related provisions, remove duplication, and harmonise terminology across the Policy, so that Council and Policy users can see the cumulative effect of the changes at a glance.

Table 8: Cross Clause Consistency

Clause	Cross-reference to	Consistency Improvement
17.8.a.iv	Cross-reference to 18.8.a.i	Eliminates duplication, creates single source of truth
18.1.b	Enhanced cross – referencing	Provides clear navigation to detailed provisions
18.8.a.i	Terminology harmonisation	Aligns with 18.8.b.i and RMA definitions
18.8.b.i – 18.8.b.iii	Parallel structure to 18.8.a	Ensures equitable treatment across development types

Table 9: Statutory Alignment

LGA Provision	Policy Requirement	Amendment Compliance
s197AB(c)	Transparency	Enhanced cross-referencing and clear exceptions
s197AB(d)	Fairness and equity	Parallel treatment of residential and non-residential
s106(2)	Methodology clarity	Separation of HUE calculation from credit assessment
s199A	Reconsideration grounds	Reduced ambiguity minimises incorrect assessments
Schedule 13, Clause 2	Units of demand	Clear linkage between credits and demand factors

8. Overall Impact Assessment of proposed amendments

Table 10 below provides the advantages and disadvantages of making the proposed amendments to the Policy.

Table 10: Advantages and Disadvantages Evaluation

Advantages	Disadvantages
Improved clarity: Users can clearly understand credit entitlements and exceptions without cross-referencing multiple conflicting provisions.	***Public perception of change****:* Even if intended as clarification, some developers or public may *perceive* the amendments as a Policy shift. This could affect Council's reputation as being undecisive. However, this will be mitigated through clear communication and public consultation.
Administrative efficiency: Council staff have a clear, consistent framework for assessing credits, reducing assessment time and errors.	
Reduced disputes: Clear provisions minimise grounds for reconsideration and objection, reducing administrative burden and resourcing.	
Enhanced transparency: Compliance with s197AB(c) LGA strengthens Policy defensibility and public confidence.	
Fairness: Parallel treatment of residential and non-residential development ensures equitable application of credit provisions.	

9. Consultation approach and timeframe

Sections 102(4)(b) of the LGA allows Council to amend the Policy at any time, provided it has first consulted on the proposed amendments in a manner that *gives effect* to the requirements of section 82 LGA. The proposed amendments are primarily procedural and technical in nature (the reconsideration process, clarification of credits and terminology, and minor drafting corrections). These changes do not alter the decision to use development contributions, the underlying methodology, schedule of assets or contributions fee previously consulted on and adopted. The proposed amendments have been assessed as not significant under Council's Significance and Engagement Policy as their impacts are predominately administrative rather than financial or strategic.

A three week consultation period is recommended as an appropriate, time-bound process that is proportionate to the level and scope of change. it strikes a reasonable balance between enabling affected stakeholders to understand and comment on the proposed amendments, and Council's obligation to use its resources efficiently.

On this basis, a concise section 82 LGA consultation is sufficient to provide people who are interested with a reasonable opportunity to present their views, without the additional cost and delay of a longer process that is unlikely to generate substantively different feedback.

Council has recently consulted on, and adopted, both the Utu Whakawhanake Development Contributions Policy 2025 and the related Revenue and Financing Policy amendments, so community views on the use of development contributions as a funding tool are already well understood and known to elected members. The current amendments are intended to ensure statutory workability (for reconsiderations), improve clarity and internal consistency (credits and terminology), and reduce ambiguity and disputes, rather than to introduce new charges or materially change who pays or how much.

Due to programme and meeting constraints, the proposed consultation will be undertaken as a standalone, time-limited process, rather than being aligned with the Annual Plan process. Proceeding now avoids further delay in implementing the amendments needed to manage the reconsideration requests within legislated timeframes and to remove inconsistencies. Consultation will use Council's usual communication channels and platforms, including the website, and social media to clearly describe the scope of the proposed amendments and the feedback sought, in a manner consistent with section 82 of the LGA.

10. Risk and Mitigation Analysis

Endorsing and implementing the proposed amendments involves both actual and perceived risks. These include the risk of:

- legal challenge if the LGA process is not correctly followed,
- reputational risk if stakeholders perceive Council as applying the Policy inconsistently or being non-compliant.

There are also operational risks associated with not resolving the identified reconsideration process issues before the Policy becomes operative.

These risks are mitigated by:

- designing and documenting a clear consultation process that gives effect to sections 82 and 102 (4)(b) off the LGA
- ensuring that consultation material is explicit about the limited scope and intent of the amendments
- aligning the final wording with legal advice and best practise.

Clarifying credit provisions in reconsideration processes will:

- reduce administrative ambiguity
- support more consistent decisions
- lower the likelihood of reconsideration requests and objections, thereby decreasing ongoing legal and reputational exposure.

Regular internal review of related policies, and clear ownership for Policy coherence, will further:

- reduce the risk of misalignment between policies,
- avoid conflicting signals to the development community.

11. Conclusion

Overall, the proposed amendments are low-risk, high-value changes that improve clarity, operational workability, and statutory compliance without changing the fundamental policy settings that Council has already consulted on and adopted. They make the reconsideration process more practical within the legislated time frame, align credit provisions with the principles and sections 197AA and 197AB of the LGA, and correct minor drafting errors so the Policy reads and operates as a coherent framework.

Using a section 82 LGA compliant process, staff are recommending a three-week consultation period. This timeframe is considered proportionate to the nature and significance of the decision Council will be asked to consider and is consistent with Council's Significant and Engagement Policy.

If adopted following consultation, the amendments would support the implementation of the Utu Whakawhanake Development Contributions Policy 2025, reduce the risks of dispute and legal challenge, and enhance transparency and clarity for both developers and existing ratepayers.