Notice is hereby given that an Ordinary Meeting of Southland District Council will be held on:

Date:	**Wednesday, 5 May 2021**
Time:	**9am**
Meeting Room:	**Council Chamber**
Venue:	**20 Don Street Invercargill**

Council Agenda
OPEN

MEMBERSHIP

Mayor	Mayor Gary Tong
Deputy Mayor	Ebel Kremer
Councillors	Don Byars
	John Douglas
	Paul Duffy
	Bruce Ford
	Darren Frazer
	George Harpur
	Julie Keast
	Christine Menzies
	Karyn Owen
	Margie Ruddenklau
	Rob Scott

IN ATTENDANCE

Chief Executive	Cameron McIntosh
Committee Advisor	Fiona Dunlop

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Full agendas are available on Council's Website
www.southlanddc.govt.nz

Note: The reports contained within this agenda are for consideration and should not be construed as Council policy unless and until adopted. Should Members require further information relating to any reports, please contact the relevant manager, Chairperson or Deputy Chairperson.

Health and Safety – Emergency Procedures

Toilets – The toilets are located outside of the Chamber, directly down the hall on the right.

Evacuation – Should there be an evacuation for any reason please exit down the stairwell to the assembly point, which is the entrance to the carpark on Spey Street. Please do not use the lift.

Earthquake – Drop, cover and hold applies in this situation and, if necessary, once the shaking has stopped we will evacuate down the stairwell without using the lift, meeting again in the carpark on Spey Street.

Phones –please turn your mobile devices to silent mode.

Recording - These proceedings are being recorded for the purpose of live video, both live streaming and downloading. By remaining in this meeting, you are consenting to being filmed for viewing by the public.

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1 Apologies

At the close of the agenda no apologies had been received.

2 Leave of absence

At the close of the agenda no requests for leave of absence had been received.

3 Conflict of Interest

Councillors are reminded of the need to be vigilant to stand aside from decision-making when a conflict arises between their role as a councillor and any private or other external interest they might have.

4 Public Forum

Notification to speak is required by 12noon at least one clear day before the meeting. Further information is available on www.southlanddc.govt.nz or phoning 0800 732 732.

5 Extraordinary/Urgent Items

To consider, and if thought fit, to pass a resolution to permit the Council to consider any further items which do not appear on the Agenda of this meeting and/or the meeting to be held with the public excluded.

Such resolution is required to be made pursuant to Section 46A(7) of the Local Government Official Information and Meetings Act 1987, and the Chairperson must advise:

(i) The reason why the item was not on the Agenda, and

(ii) The reason why the discussion of this item cannot be delayed until a subsequent meeting.

Section 46A(7A) of the Local Government Official Information and Meetings Act 1987 (as amended) states:

"Where an item is not on the agenda for a meeting,-

(a) that item may be discussed at that meeting if-

  (i) that item is a minor matter relating to the general business of the local authority; and

  (ii) the presiding member explains at the beginning of the meeting, at a time when it is open to the public, that the item will be discussed at the meeting; but

(b) no resolution, decision or recommendation may be made in respect of that item except to refer that item to a subsequent meeting of the local authority for further discussion."

6 Confirmation of Council Minutes

There are no minutes to confirm.

Long Term Plan 2021-2031 - Deliberations Report

Record No: R/21/3/12929
Author: Jason Domigan, Corporate Performance Lead
Approved by: Trudie Hurst, Group Manager Customer Delivery

☒ Decision ☐ Recommendation ☐ Information

Purpose

1 This report provides an overview of the key issues raised in feedback on the consultation document for the Long Term Plan 2021-2031 (LTP) and seeks direction from Council about any changes to be included in the final LTP and supporting information.

2 The report also outlines changes recommended by staff in order to ensure that the information and budgets in the plan reflect any changes since being released for consultation. These include changes as a result of forecasting, final project costings and corrections.

Executive Summary

3 The LTP consultation document 'It's Time, Southland/Murihiku' and supporting information was adopted by Council on 10 March 2021.

4 Public consultation occurred from 12 March 2021 to 14 April 2021. Council received 260 submissions, as well as informal feedback received via social media and via drop-in sessions with the community. A submission booklet and the informal feedback were presented to Council at a meeting held on 27/28 April 2021. At that meeting, 39 submitters also spoke to their submission, at a hearing.

5 This report asks Council to consider the feedback received on the LTP, and to consider a series of issues and options papers prepared by staff to assist Councillors in their decision-making.

6 Staff would like Council to make decisions about what changes, if any, are required to the final LTP and supporting information after considering community feedback and changes proposed by staff. Recommendations are made in each issue paper and these have been bought forward for confirmation in the recommendations section of this report.

7 The next steps are to make any required changes to the final LTP before it is audited and then adopted by Council on 23 June 2021.

Recommendation

That Council:

a) Receives the report titled "Long Term Plan 2021-2031 - Deliberations Report" dated 30 April 2021.

b) Determines that this matter or decision be recognised as significant in terms of Section 76 of the Local Government Act 2002.

c) Determines that it has complied with the decision-making provisions of the Local Government Act 2002 to the extent necessary in relation to this decision; and in accordance with Section 79 of the act determines that it does not require further information, further assessment of options or further analysis of costs and benefits or advantages and disadvantages prior to making a decision on this matter.

d) Considers the submissions and informal feedback received on the Long Term Plan 2031 consultation document.

e) Confirms in relation to issue 1, our roads:

i. to increase spending on sealed road rehabilitations by $1 million in the first year of the LTP, and an average of $2.5 million a year over the next 10 years

ii. the staff actions for our roads, summarised as follows:

Submitter No. (in booklet)	Topic	Action point for
86, 117, 231	continue to lobby funding partners such as Waka Kotahi NZ Transport Agency	staff
23	look into issues raised about particular roads	staff
57, 155, 67, 53, 187, 190, 154	provide feedback received on specific roads/areas to the relevant organisation (Waka Kotahi NZ Transport Agency /Gore District Council/the relevant community board)	staff

f) Confirms in relation to issue 2, our bridges, to increase spending on bridge replacements by $1 million, to a total of $3.5 million a year, over the next 10 years.

g) Confirms in relation to issue 3, the impact on rates for 2021/2022, that Council's preferred option (a 10.15% rate increase) remains the preferred option.

h) Confirms in relation to issue 4, district and local issues, the actions summarised as follows:

Submitter No.	Topic	Action point for
Open spaces		
31	consider the Riverton beautification request for the main street	Oraka Aparima Community Board (CB)
254	consider adding an annual grant for mowing request to the Ardlussa Community Board rate for the Riverdale Recreation Reserves Committee.	Council, staff
53	consider the Lumsden entrance beautification request	Northern CB
70	consider the request for an increase in the level of service (LoS) for mowing for Moores reserve	Oreti CB
96	consider the suggestion for a decrease in the level of service LoS for mowing and gardening	all CB's
116	consider a request for a Monowai Village bike/pump track	Tuatapere Te Waewae CB
202	explore option for assisting to fund Te Anau pool	Fiordland CB
239	consider suggestion to prune trees in Otautau	Wallace Takitimu CB
145	consider request to increase shade and provide plantings, and to provide smoke/vape free signage, in open spaces	staff
183	consider providing less funding to Henry St playground in Te Anau, as other playgrounds take precedence	staff
233	review mowing LoS request for Tuatapere	Tuatapere Te Waewae CB
165	consider the request for an increase in LoS for mowing for Stewart Island/Rakiura	Stewart Island/Rakiura CB
Community facilities		
184	consider the Riverton toilet upgrade and changing shed request	Oraka Aparima CB
89	consider a request to rationalise the Ohai Hall	Wallace Takitimu CB
112	consider the divestment of Winton Drill Hall	Oreti CB

Environmental services		
163	update name of statute in Environmental Services AMP to Heritage New Zealand Pouhere Taonga Act 2014	Staff
207	consider only having privately owned camp grounds not providing freedom camping facilities	Staff
164	consider increasing regulations for short term rental accommodation	staff
182	consider more commercial sub-division in Te Anau	Staff and Fiordland CB
Transport activity – footpaths		
181	consider the eligibility requirements for the Stewart Island/Rakiura visitor levy, to ensure they allow funding for footpaths	Stewart Island/Rakiura CB and staff
Transport activity – Te Anau Airport Manapouri		
183	consider whether the airport should be a District asset	Staff
Waste services		
234	consider whether there should a green waste disposal site in Tuatapere	Tuatapere Te Waewae CB
252	consider changes to local waste depot, request for recycling container	Waihopai Toetoe CB
Community leadership		
89, 195	consider more opportunities for staff to meet with Councillors	staff
150	for the next LTP process, consider undertaking informal polls to gauge youth sentiment	staff
151	consider providing funding for trail signage	Fiordland CB
169	consider developing strategies to assist community boards with their decision making	staff
232	liaise with Murihiku Kai Collective to ascertain how staff can provide assistance	Staff
Rates, finance and funding requests		
71	consider rating approach for water supply and sewage services when ratepayer does not receive these services	Staff

237	consider rates funding request for the former court house building	Wallace Takitimu CB

i) Confirms in relation to issue 5, dust suppression and other roading matters, the actions summarised as follows:

Submitter No.	Action	Action point for
Dust Suppression		
1, 54, 73, 93, 116	to look at options to provide support to residents suffering from the impacts of dust	Council, staff
53, 99, 128, 152, 160, 170, 252	to consider the affordability, maintenance requirements, prioritisation and implementation of a programme to deliver dust suppressant seals	Council, staff
Other roading matters		
63	to continue to discuss with Waka Kotahi NZ Transport Agency the charges/taxes etc that may apply to electric vehicles	Council, staff
118	to discuss the iron bridge gravel track with Waka Kotahi NZ Transport Agency	Council, staff
132, 208, 257	to follow up with submitters where potential requests for service (RFS) have been highlighted	Staff

j) Confirms in relation to issue 6, funding requests and grant structure, that Council:

i) make decisions on whether to grant funding to any or all of the applications received as submissions to the Long Term Plan as outlined below:

a) Approves/declines a grant of $50,000 to the Western Southland Trails Trust for a feasibility study on the proposed trail.

b) Approves/declines a grant of between $30,000-$70,000 to Sport Southland for a staff member to find innovative ways of increasing physical activity in the Southland District Council area.

c) Approves/declines a grant of between $7,275.00 ($5.00 per rateable property) and $14,550.00 ($10.00 per rateable property) to Otautau Museum and Heritage Trust from the Wallace Takitimu Community Board area, to be retained by the Board for distribution to the Trust.

d) Approves/declines a grant of $39,100 ($1 per resident) to the NZ Memorial Museum and Visitor Centre in Le Quesnoy, France.

e) Approves/declines a grant of $1.25 million to the Fiordland Trails Trust for the trail to Te Anau Downs, and $250,000 for the completion of the Lake to Lake Trail. Also requesting yearly maintenance costs for the trails increasing to $22,400 a year in five years' time. Also requesting support for an administrative role.

f) Approves/declines a grant of $2,000 to Catlins Promotions for printing its Catlin's Coast maps

ii) Adopts the new grant structure to ensure all grants have to go through the District Initiatives Fund and to create contracts for services for present grants that are more work being done on behalf or for Council.

iii) Changes the District Heritage Fund to an annual payment.

k) Confirms in relation to issue 7, staff amendments, that staff prepare the Long Term Plan with all the amendments requested.

l) Instructs staff to prepare the final Long Term Plan 2021-2031 and supporting documents in a way that reflects the decisions that Council has made in relation to the submissions received and staff recommendations in this report.

m) Notes that submissions that relate to operational matters such as maintenance or renewal works, requests for more information, for reviews and changes to programmes or projects, have been provided to relevant staff and will be considered alongside existing work programmes and actioned as appropriate.

Background

8 The consultation document titled 'It's Time, Southland/Murihiku' was made available to the public from 12 March 2021 to 14 April 2021. The consultation document set out questions around issues identified for Council's LTP. The key questions posed were about our roads, our bridges and the impact on rates. The consultation document also highlighted to the community:

- the ongoing impact of Covid-19
- an update on the status of the three waters reforms process
- significance of climate change and unexpected events into the future
- the financial and infrastructure strategies and changes to key policies.

9 Members of the public lodged their submission through the online submissions system, manually on the form enclosed with the consultation document, or by writing to or emailing Council. Council received 260 submissions. Informal feedback was also received via Council's Facebook page and at community drop-in sessions.

10 The formal submissions and the informal feedback were presented at the Council meeting held on 27/28 April 2021. A hearing was also held at that meeting, where 39 submitters spoke to their submission.

11 The feedback received related to the questions posed over key issues identified by Council as well as other general issues.

12 Council is now being asked to consider the feedback, and to make decisions on issues and options papers prepared by staff. Staff are seeking clarity on changes that need to be made ahead of the adoption of the final LTP on 23 June 2021.

Issues

13 Councillors have received a complete booklet of all the submissions and the informal feedback received.

14 The submissions have been analysed and inform the preparation of the issues and options papers (including recommendations) that are included as attachments to this report as follows:

- attachment 1: our roads
- attachment 2: our bridges
- attachment 3: the impact on rates
- attachment 4: district and local issues
- attachment 5: dust suppression and other roading matters
- attachment 6: funding requests
- attachment 7: staff amendments

15 The issues and options papers also include summaries of the feedback received (by topic), and excerpts of feedback from submitters.

16 Councillors may identify any other issues from the submissions that they wish to discuss or consider warrants a decision or action from Council.

17 The issues that were raised in submissions fall into five broad categories:

- feedback on proposals outlined in the consultation document, on which staff have made a recommendation - these are discussed in the attachments.
- funding requests and other prominent issues raised through submissions, on which staff are seeking guidance or have made recommendations - these are also discussed in the attachments.
- matters for further consideration - these relate to submissions that have raised issues that require further investigation. Where appropriate, these will be considered as part of preparing for the Annual Plan 2022/2023. Some other requests may be considered as part of Council's work programme going forward.
- minor wording changes to the LTP documents.

Factors to Consider

Legal and Statutory Requirements

18 Local authorities are required to develop a consultation document for the purpose of consulting with the community, as well as making publicly available the information that provides the basis for the preparation of the LTP. The consultation document was prepared to meet all legislative requirements and to include sufficient information to inform the public about what is planned for the district and the key issues.

19 Under the Local Government Act 2002 (LGA), a local authority must use the special consultative procedure (SCP) in adopting a LTP. As part of the SCP, Council must provide an opportunity for people to present their views to Council. A hearing was held at the Council meeting on 27/28 April 2021, and 39 submitters spoke to their submission.

20 Before deciding on the matters raised in this report, Council may request or consider comment or advice from staff or any other person in respect of the proposal or any views on the proposal.

21 Under section 78 of the LGA, Council must, when deciding how to proceed, consider the views and preferences of persons likely to be affected by, or to have an interest in, the matter. There is not a requirement to please all of the submitters, but Council must consider the views that have been expressed.

22 When making decisions, Council should also consider whether it has sufficient information about the views and preferences of those likely to be affected by or have an interest in the matter.

23 Due to the financial constraints the Council is operating under, including the need to stay within the parameters of its Financial Strategy, staff are only recommending budget and other changes where a proposal is sufficiently robust, clearly aligns with Council's priorities, and has significant and broad community backing. In some cases, further investigation may be required. Any changes proposed would have to comply with the requirements of SCP, and would have to be 'on the table' in the consultation document and supported by feedback received in submissions.

Community Views

24 The community views captured through the consultation process were summarised in the report that went to Council on 27/28 April 2021. All of the submissions received and the informal feedback received, were also included as an attachment to that report.

25 Each of the issue and options papers attached to this report also include a summary of the views expressed on that topic.

Costs and Funding

26 The financial implications of each of the options for the proposals and impact on rates were set out in the consultation document and supporting information. Additional details have been included in the issues and options papers where relevant.

Policy Implications

27 Relevant policy implications are discussed in detail in the individual appendices.

Analysis

Options Considered

28 Please refer to the attachments for a full list of the options for each issue. Advantages and disadvantages are also outlined for each option.

Assessment of Significance

29 Staff consider the decisions being made in this report to be significant in relation to Council's Significance and Engagement Policy and the LGA.

30 The likely impact and consequences of the decisions are considered significant for the current and future social, economic, environmental or cultural wellbeing of the district.

31 A thorough process has been followed to meet the requirements of this decision making process. The consultation document and supporting information was based on numerous workshops held with Council and community boards, ensuring that there has been extensive community level input. In addition, discussions occurred with Te Ao Mārama Incorporated on behalf of local iwi. Community views have also been considered through the formal consultation process. In relation to the decision being made, Council has also taken into consideration the high significance of this matter when it has:

- identified the reasonably practicable options
- assessed options in terms of their advantages and disadvantages
- considered likely costs and benefits
- considered information (the extent and detail of information considered)
- kept written records documenting compliance with these requirements
- identified potential implications.

Recommended Option

32 The recommended options are outlined at the beginning of this report, and in the attachments to this report.

Next Steps

33 Following Council's deliberations and decision-making, staff will develop the final LTP and supporting information. A draft of the final LTP and updated supporting information will be audited in late May. The full LTP will also be circulated to the Finance and Audit Committee on 15 June 2021 prior to adoption by Council on 23 June 2021.

Attachments

A Issue and options paper 1 - Our roads ⇩
B Issue and options paper 2 - Our bridges ⇩
C Issue and options paper 3 - Impact on rates ⇩
D Issue and options paper 4 - District and local issues ⇩
E Issue and options paper 5 - Dust suppression and other roading matters ⇩
F Issue and options paper 6 - Funding requests and grant structure ⇩
G Issue and options paper 7 - Staff amendments ⇩

Attachment 1

Issue and options paper – our roads

Background

Council's roading network is to enable goods and services to move throughout the District, supporting people's ability to connect, live, work, visit and travel safely throughout Southland. Specific services include providing:

- roads that are fit for purpose and deliver comfortable and efficient travel (free of debris, grading gravel roads, road renewals etc)
- a safe roading network
- footpaths that are safe, well designed and well maintained
- fit for purpose facilities in appropriate locations, that are managed cost-effectively.

In relation to this paper, road rehabilitations are restorations consisting of structural enhancements that extend the service life of an existing sealed road and/or improve its structural capacity. Rehabilitations can include building up new layers of pavement/road or stabilisation techniques.

An overview of the submitter comments received on 'our roads' is given below. The table at the end of this paper includes excerpts of the comments received. In the table, staff have responded to the submitters' comments, and in some cases, have proposed a response. Proposed responses have been called actions, and these actions are highlighted in yellow. The recommendations in this paper include actions for staff to complete.

Transport Activity Management Plan

Staff have had sessions discussing a Transport Activity Management Plan (AMP) with councillors, and received guidance to help formulate the AMP. The AMP identifies strategic issues, risks, and identifies the need for investment in the transport sector. The AMP was adopted by Council on 10 March 2021 as part of the supporting information to the LTP consultation document.

The AMP identifies a number of emerging issues impacting Council's roading network, that have been points of discussion for the LTP.

Emerging issues identified by staff

The key issues identified in relation to our roads, are:

- a large number of sealed roads coming to the end of their economic life (this is when it is more cost effective to renew the road than to undertake repairs)
- increased investment and rehabilitations are required due to climate change
- seal layers on roads starting to become unstable and resulting in excessive bitumen build up
- a 20% average increase in the cost for sealed road rehabilitation (this increase is approximately $60,000 p/km)
- a 5% increase in maintenance costs annually (this increase is approximately $600,000)
- increase in heavy vehicle traffic, accelerating road deterioration
- any changes to the availability of subsidy from Waka Kotahi New Zealand Transport Agency impacting the 'size' of the roading programme.

The consultation document

Council's preferred approach for 'our roads' (as outlined in the Transport AMP), was identified as being one the of the major decisions proposed by Council over the 10 years of the LTP. On this basis, 'our roads' were included as one of the issues Council was keen to receive feedback on, in the LTP 2031 consultation document adopted by Council on 10 March 2021.

The consultation document presented options to the public on how Council could invest in roading rehabilitations. These options were:

Option 1 - increasing spending (Council's preferred option)

- increase spending on sealed road rehabilitations by $1 million in the first year of the LTP, and an average of $2.5 million a year over the next 10 years. The new total budget would start at $4.2 million in year one (2021/2022), rising to $18.9 million in year 10 (2030/2031).

Option 2 – status quo

- continuing to spend around $3.2 million each year on sealed road rehabilitations.

Option 1 would enable Council to carry out, on average, an additional 7km of road rehabilitations each year for the first three years of the LTP (around 13km a year in total). By the end of the LTP period, 28km of roading rehabilitation would be completed annually. The advantages and disadvantages of this option are outlined below. This option comprises 0.92% of Council's proposed overall rates increase of 10.15%.

Option 2 would mean Council would carry out, on average, 6km of road rehabilitations each year. The advantages and disadvantages of this option are outlined below. For this option the preferred rates percentage increase would decrease from 10.15% to 9.16%.

Issues - summary of feedback

Of the 210 submitters who selected a preferred option, 46% supported increasing spending on sealed road rehabilitations, and 54% supported continuing to spend around $3.2 million each year. Fifty submitters did not state a preferred option.

Submitters gave a number of reasons why they supported increasing spending (option 1), including to ensure:

- roads are a good quality
- roads are safe
- our communities are connected
- roads are managed effectively and efficiently so Council can be proactive (not reactive to problems when they have developed)
- freight and people can move effectively through the District
- there are appropriate levels of investment now.

Submitters who supported spending the same amount (option 2) also gave a number of reasons for their preference, including:

- concerns about peoples' ability to pay (particularly due to the impacts of the Covid-19 pandemic and the associated job losses)
- that money could be better spent in other areas
- that roads in the District are in good condition

- that Council should focus on effectiveness and efficiency – doing more with the same amount of money
- that Council should be focussing its efforts on different modes of transport, such as rail.

A number of submitters raised concerns about the quality and effectiveness of roading rehabilitations. Submitters observed that roads that had recently been repaired were often repaired again within a short period of time, and submitters also felt that rehabilitations were being done to an unsatisfactory standard. Five submitters specified the particular road rehabilitations they thought were unsatisfactory.

Some submitters believed there should be changes to how roads are funded. Some submitters thought the heavy vehicle sectors and tourists should pay more, some felt there should be more government assistance (including the amount of road user charges available in our District), and one submitter suggested a toll road.

Submitters raised a number of concerns about gravel roads. The issue of 'dust suppression' is addressed in a separate issues and options paper, but people also had concerns about gravel road quality, consistency and maintenance.

Cost and funding

Council is aware a large number of sealed roads are requiring investment between 2030 and 2048. The roads requiring investment include collector roads (important local roads that link local areas/economic sites) and other 'lower' volume access roads that feed collector roads.

A graph showing the relationship between investment and roading rehabilitations is shown below.

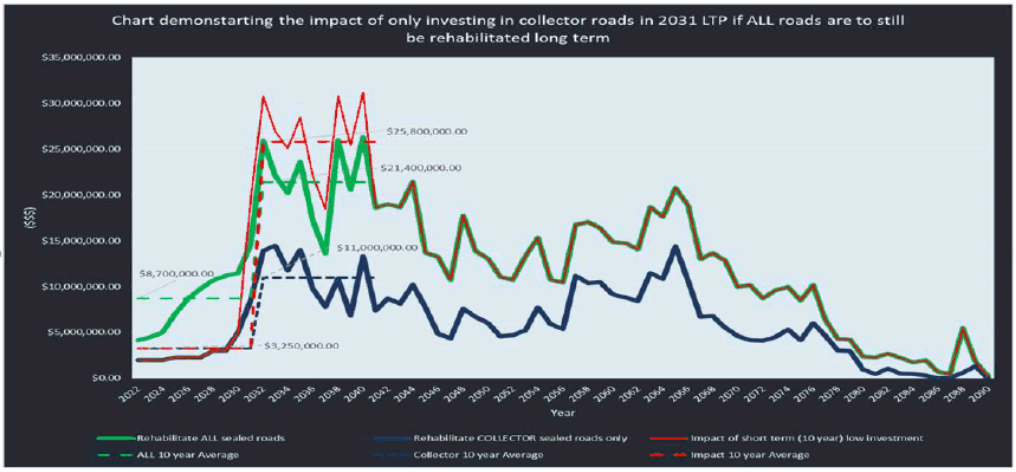
To maintain similar levels of service (to current levels), Council would have to invest in roading rehabilitations in accordance with the green line shown below. With this level of investment, rehabilitations would be undertaken for collector roads and access roads where usage exceeds 100 vehicles per day. The dotted green lines below outline the 10-yearly average investment proposed in the 2031 LTP (in accordance with option 1), and the investment that would be required in the subsequent 10-year period (2031-2041).

If Council continued spending approximately $3.2 million each year on sealed road rehabilitations (in accordance with option 2) it would be able to undertake rehabilitations on collector roads, but not access roads. The required investment in collector roads, to retain current levels of service, is shown in blue below. The dotted blue line shows the level of investment proposed throughout the 2031 LTP period and the subsequent 10-year period (2031-2041).

If Council elects not to invest in access roads in this LTP, it is unlikely to have the ability to rehabilitate and fund them at a later date, as an even higher level of investment would then be required. For example, if Council decided to not invest in access roads this LTP but decided to invest in them in 10 years time, an additional $4.4M/annum would be required for roading rehabilitations over that 10-year period (2031-2041), compared to if option 1 is selected now. The increased investment that would be required is shown in the red dotted line from 2031 to 2041. If sealed roads deteriorate significantly, additional preparation work/investment is also required to bring them back up to an appropriate level of service.

If Council decides to proceed with option 2, there would initially be a cost saving, with additional money required for maintenance in the short-medium term. In the medium to long term there would be a reduction in the level of service for access roads (potentially reverting roads to gravel), as Council will not be able to generate the required funding to keep these roads at their current standard/level of service in the future.

Investment vs Impact



As has been outlined above, option 1 comprises 0.92% of Council's proposed overall rates increase of 10.15% for 2021/2022. For option 2, the preferred rates percentage increase would decrease from 10.15% to 9.16% for 2021/2022.

A number of submitters have commented on how roading rates are collected from various users. The roading rate model contains three components, that are summarised in the table below:

Component	Calculation
Fixed charge reflecting the benefit that everyone receives from access to the roading network	Approximately 8.75% of the total roading revenue required by Council. This reflects $80 per rating unit (GST exclusive).
Differential for heavy vehicle usage reflecting the demand that different users place on Council's roads	1. Determines a fixed charge per tonne (currently set at $1.10). 2. Estimates tonnage for each land use sector using information provided by Infometrics Limited. 3. Multiplies tonnage by the fixed charge.
Rate charged according to property value for general roading costs (eg signage)	Allocates remaining amount to all ratepayers based on a consistent rate in the dollar for all sectors. The rate in the dollar is charged on the capital value of all associated rating units.

Options

Two options have been identified for how Council could proceed. These are:

- **option 1** - increase spending on road rehabilitations by $1 million in the first year of the LTP, and an average of $2.5 million a year over the next 10 years
- **option 2** - continuing to spend around $3.2 million each year on road rehabilitations.

Option 1 – Increase spending on road rehabilitations by $1 million in the first year of the Long Term Plan 2031, and an average of $2.5 million a year over the next 10 years.

Advantages	*Disadvantages*
• for the first three years of the LTP there would be an additional 7km of road rehabilitations each year (around 13km a year in total) - by the end of the LTP period, 28km of roading rehabilitation would be completed annually • current levels of service are likely to be maintained. This means that, in most situations: - sealed roads will not be reverted to gravel - current roads will remain open - speed restrictions (due to the quality of the road) will be unlikely - sealed roads will not become rougher and slicker - required rehabilitation repairs will not become more noticeable - travel times are likely to remain the same/similar - there will be a similar level of wear and tear on vehicles - there will be a similar level of customer satisfaction • less non-routine maintenance costs • Council would be able to keep on top of its roading maintenance programme.	• there would be a rates increase in year one of $458,000, which comprises 0.92% of Council's proposed overall rates increase of 10.15%. Over the 10 years of the plan, the annual increase in rates would vary from $225,000 to $2,124,000 • some changes to level of service may still occur • this option would not be in line with the majority of community views received on this matter.

Option 2 – Continuing to spend around $3.2 million each year on road rehabilitations

Advantages	*Disadvantages*
• this option would be in line with the majority of community views received on this matter • there would be a rates reduction of $458,000, reducing the preferred rates percentage increase (outlined in the consultation document) in 2021/2022 from 10.15% to 9.16%. Rates will reduce between $636,000 in 2022/2023 and $7.1 million in 2030/2031.	• Council would not maintain current levels of service. This means that: - a small number of sealed roads may be reverted to gravel - some roads may close - more speed restrictions may be imposed - roads may become rougher and slicker, which may be less safe - required rehabilitation repairs may become more noticeable - travel times may increase

	- there may be more wear and tear on vehicles - the level of customer satisfaction may decrease - additional funding required for maintenance in the medium term.

Discussion/analysis

Analysis of the options has been explored during the development of the AMP and in the table above. Of submitters who specified a preferred option for our roads, 54% were in favour of option 2 - maintaining the status quo. Option 1 would result in a safer and better roading experience for people travelling in the District, but this comes at a cost.

Recommendation

That Council:

a) **confirms increasing spending on sealed road rehabilitations by $1 million in the first year of the LTP, and an average of $2.5 million a year over the next 10 years.**

b) **Confirms the staff actions** (these have been identified and pulled up from the submitter summary table below) **for our roads, summarised as follows:**

Submitter No. (in booklet)	Topic	Action point for
86, 117, 231	continue to lobby funding partners such as Waka Kotahi NZ Transport Agency	staff
23	look into issues raised about particular roads	staff
57, 155, 67, 53, 187, 190, 154	provide feedback received on specific roads/areas to the relevant organisation (Waka Kotahi NZ Transport Agency /Gore District Council/the relevant community board)	staff

Excerpts of feedback on 'Our roads'

Submitter	Option pref.	Submission summary	Staff recommendation
General comments from submitters who supported option 1			
Trina	1	No issues with Southland's sealed roads. Submitter doesn't like that other people don't drive appropriately on the roads - people think there is an issue because there is an accident. Believes Council should properly assess why the roads are bad in places, and don't put Band-Aids on them. Focus should be on regular people who use roads for commuting work etc, not tourists.	That Council notes the submitter's feedback. Council seeks to find the best 'whole of life' cost. In some instances, a short-term intervention is required to make a site safe until the appropriate longer-term repair can be completed.
Sharon Donaldson	1	Should focus on roads with milk tankers using them. This would add value to the properties which would increase rateable value and rates.	That Council notes the submitter's feedback. The bulk of the investment tends to be on those routes used by heavy vehicles.
Alistair Weir	1	Our roads in Southland are deteriorating and need investment. Appreciates good quality roading for motorcycle riding.	That Council notes the submitter's feedback.
Ivan Fitness	1	We can have a robust, ongoing investment system or a decaying system where roads etc get progressively worse. Not that keen to pay for it though - but supports investing more.	That Council notes the submitter's feedback.
Chris Sara, Church Hill	1	Delaying increases now will only result in greater costs later. Effective and efficient infrastructure work is important and the benefits will out weight in the long term.	That Council notes the submitter's feedback.
Pip Ward	1	People travel long distances, so it's important to keep the roads safe. Especially important to upgrade roads if more trucks in region due to other regions using Kinds Bend landfill site. Passing lanes needed in main arterial roads.	That Council notes the submitter's feedback. Highways are not manged by Council.
Hamish McMurdo	1	Supports investing more, but only if the work is completed in a timely manner.	That Council notes the submitter's feedback.
Sandra Cooper	1	Notes roads/bridges are in bad state. States dramatically increasing rates not the solution – other options available. Suggests other avenues and 'outside of the square' thinking. Proposes assistance from central government and a tourist tax. Supports some low-use roads being reverted to gravel.	That Council notes the submitter's feedback. Council regularly lobbies funding partners such as Waka Kotahi NZ Transport Agency.
Mary Napper	1	Council should have slowly developed maintenance budget over previous years. Catching up now is difficult and will hurt people. Noticed decrease in standard of roads over last 32 years.	That Council notes the submitter's feedback. The bigger issues are around renewal and replacement of infrastructure that is now starting to reach the end of its useful lives and it is no longer economic to continue doing maintenance works.
Avis Peters	1	Notes country road condition seems to be deteriorating. Cost to repair them can only keep going up. Would hate to see roads revert back to gravel.	That Council notes the submitter's feedback. Council agree that the road conditions are starting to deteriorate and that is why we want to start increasing renewal investment now.

Ivan Dale	1	Doesn't support reverting sealed roads back to gravel.	That Council notes the submitter's feedback. This is not Council's proposed option but would be a consequence if Council proceeds with option 2.
Richard Clarkson	1	Would like to see more progress being made and more rehabilitations and reseals being carried out.	That Council notes the submitter's feedback. This is in line with Council's proposed approach for rehabilitations.
Pat Killeen	1	Our roads must be kept in top condition. Having 70k temporary signs on major highways is a poor response to dangerous surfaces.	That Council notes the submitter's feedback. Highways in the district are not managed by Council but they do demonstrate the consequences of not investing appropriately.
Stephen Keach	1	Roads are Southland's economic arteries. They need to be fit for purpose. People complain when they aren't fit for purpose, so need to step up to contribute to their upkeep. Everyone benefits from the existence of a roading network. Sweating assets is a short-term gain, and isn't healthy in the medium to long term.	That Council notes the submitter's feedback.
Le-Anne (Lee) Murray	1	Happy to pay a rate increase that is considerate to all in the District. The consultation document proposes rate increases (decrease) ranging from -2% to 16%. If the roads throughout the District are for all to use, then how does one ratepayer pay less and another rate payer pay more? Why wasn't there money put aside and planning set in place to sufficiently maintain the roads over these past decades?	That Council notes the submitter's feedback. There is no single reason why money has not been put aside. Reasons range from trying to keep rates as low as possible through to the amount of subsidy received from Waka Kotahi NZ Transport Agency (slowing reducing over the past decades). Council uses a model to set the roading rate. This comprises of a set rate (reflecting everyone has access to the roading network) and a differential rate (reflecting some users have a greater impact when using the road).
Fiona Black – Real Journeys	1	Council must maintain the quality of the District's roads as there are not viable alternatives for the transport of freight and people across the District.	That Council note the submitter's feedback. Council considers availability and suitability of alternative routes as part of its prioritisation.
Sarah Thoene	1	Seems sensible given the current subsidy, no increase in debt and maintaining current levels of service.	That Council notes the submitter's feedback.
Larina Harris	1	Spend what we need to - make sure our roads are safe and hopefully increase in surface quality and keep roads and bridges open. High volumes and heavy truck movement to AB Lime will make our roads less safe and increase maintenance costs. If that initiative proceeds, disagree with passing extra costs on to locals.	That Council notes the submitter's feedback.
Ian Smith	1	We should not let our roads deteriorate. Rural roads need to be kept safely maintained.	That Council notes the submitter's feedback.
Anita Geeson	1	Better roads are safer roads. Roads are key to the economy across the District.	That Council notes the submitter's feedback.
Neville Lindsay	1	If a contractor is using graders/other important machinery frequently on SDC roads 5-6 days, surely it is prudent/economical for Council to own them. Too much money being wasted on contractors, but they do have a place at time.	That Council notes the submitter's feedback.
David Boniface	1	It's incredulous that SDC are consulting the public with this matter. It is time that Council applied basic asset management principles by appropriately skilled managers to the maintenance and renewal of all of	That Council notes the submitter's feedback. For key assets such as roads and bridges, asset management plans covering 30 plus years

		their assets. ie. 1) Have a comprehensive and up to date asset inventory. 2) understand the current condition of all assets. 3) have well defined and acceptable levels of service requirements for each asset. 4) apply deterioration models based on current best practice. 5) and crucially, intervene at the right time to retain levels of service. Ten-20 year outlook is necessary to enable sensible flatline funding. Disappointing to see recent asset consumption/levels of service falling. Asset maintenance is not sexy and does not win votes for mayors or councillors!!!	have been prepared but agree that these need to be backed by sensible funding.
Alistair Faulknor	1	Supports option 1 as long as roads on the island are repaired.	That Council notes the submitter's feedback. Larger levels of investment, such as resurfacing of roads, on average occurs every 13 years.
SDC Youth Council	1	Southland's roading network is vital economically and socially, connecting our communities. Important to have better roads to enable us to travel safely. As new drivers, the poor quality of some roads does impact on our confidence. Only local knowledge allows us to avoid potholes /damaged areas. The increase in rates would likely equate to the cost of wear and tear/potential damage to vehicles.	That Council note the submitter's feedback. There is a link between condition of roads and running costs of vehicles and it is a balance to ensure the appropriate levels of intervention are carried out at the right time to achieve the correct balance between cost of maintaining road and vehicle operation costs.
A Reilly	1	I don't think anyone would argue that the roads are terrible. Staff have stated "we have known about this for a while…". Fine. Collectively we will have to pay.	That Council notes the submitter's feedback.
Anne Robbie – Ryal Bush Community Centre	1	The way we utilise our roads has changed (increased road usage, heavy vehicles, farm and industrial vehicles, dirty/soiled vehicles). We need to get on top of the new usage and plan for continued increase with light vehicles as well.	That Council notes the submitter's feedback. Vehicle usage has steadily increased over the years and as such Council needs to continue to invest in its road network in order to provide an appropriate level of service to meet demand.
Leanne Liggett – Public Health South	1	Road safety is important - Council's preferred option will support improved connectedness between communities. This may also improve access to neighbouring services (for example between Ohai and Nightcaps); promote increased active transport options and create less pollution.	That Council notes the submitter's feedback. Council is cognisant of the impact that vehicle usage has on New Zealand's carbon footprint. Council is vested in better understanding opportunity to support and promote activity transport options.
Allan Baird	1	Good roading is key to many aspects of our life in Southland. Roading is critical for connected communities - move product/active recreation. Our region needs to attract visitors from northern populations, a poor roading network will temper the experience and likely create negative social media coverage. Correct the under investment in the network and get back on task.	That Council notes the submitter's feedback.
Colin Smith	1	Our roads are deteriorating, some faster than others. The loads on our roads are increasing and the maintenance has not kept pace.	That Council notes the submitter's feedback. Council seeks to balance funding and maintenance requirements to maximise asset life.
John and Lisa Hay	1	Southland's roads have been deteriorating for several years (including roads recently built under investment by council). Council has not been not keeping up with the increased volume of vehicles and trucks.	That Council notes the submitter's feedback.

Normal and Helen McLeish	1	Need to keep roads maintained well. Keep all the roading money within SDC area. Farming is an essential industry and we need the roading and bridges to actually work.	That Council notes the submitter's feedback.
Graeme Stuart – Chair Oraka Aparima CB	1	Supports option 1. In particular supports this option for road safety reasons, and reducing requests for service, as planned maintenance is more proactive.	That Council notes the submitter's feedback.
Sarah Greaney – Fiordland CB	1	The board recognises the importance of the roading infrastructure in allowing for economic development and connectivity through the region and beyond. It believes that we cannot afford to increase travel times between key destinations such as Invercargill and Queenstown as this could act as a deterrent for visiting the area. It therefore supports option 1.	That Council notes the submitter's feedback.
Diane Fretter	1	Spending needs to increase, but the rates increase covers these 2 issues and much more. Communities would appreciated information on how the other several million of revenue will be spent.	That Council notes the submitter's feedback.
Carolyn Smith	1	Enforce the 'no storage of bailage or hay on the road reserve' therefore lessen the mud damage to roads in the winter.	That Council notes the submitter's feedback. Storage of baleage within the actual road reserve is limited but Council agrees that good farming practise to reduce debris on roads does lessen damage and maintenance requirements on roads.
Maree Whiteley	1	The upkeep of our Districts roads is very necessary.	That Council notes the submitter's feedback.
Caldwell	1	Roads need to be improved. Some busy gravel roads should be sealed.	That Council notes the submitter's feedback. Council uses a business case approach to sealing gravel roads. Based on current road information there are no gravel roads that would successfully justify the level of investment required to be sealed.
Les Scown	1	Because there is a 52% subsidy from the NZTA I would like to see even more initial spent on roading. This money could be taken from community board projects, some of which in my opinion are not required	That Council notes the submitter's feedback. Council has competing needs for investment and needs to consider what is best for Southland.
Wendy Knowler	1	Better response to user complaints, pot holes, faded road markings etc	That Council notes the submitter's feedback. If specific sites were mentioned, this would help staff to look into the issue.
Beverly Osborn	1	Option 1 needs to happen. As a resident in the Southland District, I have a responsibility to play my part in providing funding for the tasks, even though I am unlikely ever to travel on most of the roads in need of upgrade. Similarly, Southlanders who have never visited Stewart Island and have no desire to do so in the future, will be contributing through their rates to work carried out on Rakiura.	That Council notes the submitter's feedback. Council agree that rates collected for roads and bridges give people access to a network that is the second largest after Auckland.
Kim Reilly – Southland Federated Farmers	1	Southland Federated Farmers supports the increase in investment in the roading network as outlined in SDC's preferred option (subject to that investment being efficient and effective). Roads are core infrastructure which are in many cases nearing the end of their economic lives with some in danger of reverting to gravel. Good roads are crucial for economic and social connectivity and wellbeing.	That Council notes the submitter's feedback. Council strives to optimise levels of investment while maximising asset life.

General comments from submitters who supported option 2			
Glyn Saunders	2	Appreciates the need for safe roads and bridges, but believes expectations should be matched with the cost these create. Slower speeds not the end of the world. If people want high-end highways, move to a city.	That Council notes the submitter's feedback.
Lisa	2	Money could be better spent. No more needs to be spent on Southland roads.	That Council notes the submitter's feedback. Road and bridges form the backbone of the Southland economy and the right balance between short term and long-term investment needs to be achieved, while also considering the district's economic prosperity.
Douglas Agnew	2	The status quo should remain. Sees no reason to increase spending and suggests Council spend less on the roads.	That Council notes the submitter's feedback.
Faylene Ferris-Olasa	2	Thinks investment should be towards roads affected by dust, otherwise no point. If roads have to revert back to gravel/be closed, so be it. Who would police speed restrictions?	That Council notes the submitter's feedback. Police have responsibility for enforcement of speed restrictions.
Henderson Brian McArthur	2	We already pay far too much.	That Council notes the submitter's feedback.
Alanna Barrett	2	Supports spending $3M.	That Council notes the submitter's feedback.
Katie Jones	2	Fix and maintain our roads. Get a glass crusher back operating to help with roading/footpaths and we are not dumping glass into landfill. Focus on the essentials and the infrastructure. Why do we need to invest $800k in an airport in Manapouri?	That Council notes the submitter's feedback. – Resealing of the runway is required to comply with Part 139 certification and receive heavier aircraft. The current condition has imposed restrictions on use such as operational length and heavy aircraft landings.
Jonathan Pidduck	2	Council will have more rate payers paying as more people move to the area. Suggests increasing efficiency with infrastructure instead of simply paying more.	That Council notes the submitter's feedback. Council regularly reviews how services are procured and delivered with the goal of providing the appropriate infrastructure at the appropriate cost.
Jonathan Bringins	2	What are we doing to reduce car usage? More transport to mass transport, lorries onto rail.	That Council notes the submitter's feedback. Due to the rural nature of Southland and its large geographical area, moving produce by mass transport does provide real challenges to Southland.
Fleur Harding	2	Tuatapere does not see much work done anyway so why should Tuatapere residents pay for it?	That Council notes the submitter's feedback. Rates for roads and bridges provide rate payers access to the second largest territorial road network after Auckland. This is a similar approach to paying taxes for a hospital. It is not used every day but gives the opportunity to be used when required.
Peter Goomes	2	Suggests that Council shouldn't worry about more footpaths on Stewart Island, and that education signs and lower speed limits could be worth trying.	That Council notes the submitter's feedback. Council agrees that the unique nature of Stewart Island provides for unique opportunity.
Shirley Paterson	2	Roads are in a poor state. Should be a joint effort with other provinces as we have a large district and a small population. Larger funding bucket needs investigation.	That Council notes the submitter's feedback. Council agree that all avenues of funding need to be explored.
Douglas Agnew/Jenny	2	Main link roads should remain sealed as they are now, subsidiary roads should become gravel roads. This will reduce cost.	That Council notes the submitter's feedback. Councillors have indicated they do not wish for sealed roads to revert to gravel. This may happen longer-term if there isn't increased investment.

and Tony Tippet			
Andre Bekhuis	2	Would like to see investigation into the use of rail to get the heavy traffic off the roads.	That Council notes the submitter's feedback. Mass transport would be a preferred option but due to the large geographical area of Southland and nature of the Southland economy, the 'last mile' access is a real challenge for this type of transport.
Nigel Humphries - Anchorage	2	Keep within the current spending and look at where it is being spent - budget needs to be looked at closely and all expenditure accounted for.	That Council notes the submitter's feedback. The challenge is that a lot of the infrastructure was built around the same time and therefore reaching the end of its useful life around the same time.
WF Doherty	2	In respect to the roads on Stewart Island a simple task of keeping the water tables at the sides of the roads clear would save on new expenditure.	That Council notes the submitter's feedback.
Brian and Bev Evans	2	Remember small towns still need road repairs.	That Council notes the submitter's feedback.
Gary McCorkindale	2	What's wrong with gravel roads.	That Council notes the submitter's feedback. Gravel roads have their place as part of a wider road system but can be more expensive to maintain when exposed to higher levels of traffic. Typically more than 200 vehicles movements a day.
Bevan Webster	2	Start planning things properly and find a contractor that will do it cheaper.	That Council notes the submitter's feedback.
Denis and Ngaire Bartley	2	Council needs to know what the future source of transport energy will be e.g. electricity, hydro, wind, solar, waves, hydrogen, fossil fuels. Will rail be a main method of transport? Until we know it may be prudent to continue the status quo. Likely to affect the wellbeing of ratepayers if there is a major increase in rates.	That Council notes the submitter's feedback. While other forms of transport such as hydrogen or electric will become more common, the size of Councils road network will require rebuilding over decades not just years.
Max Fretter	2	Supports status quo, but SDC needs to do a heck of a lot better in (a) managing the roads asset (b) managing the repairs/contractors (c)using proper user-pays to manage maintenance costs. Overall – go back to the drawing board, and work smarter not just accept the same old assumptions. The plan doesn't consider changes in traffic mix (extra forestry, changes in urbanization & commuting from COVID & its legacy of distance working etc etc) or traffic technology (electrification, smaller personal vehicles, differences in personal travel choices, continual demand for increases in oversize/overweight bulk haulage from commercial lobbyists). Roads aren't being managed properly, the incidents of closures/speed limits/ degradation is totally reactive. Having IT-based tools like RoadRoid (presume Android smartphone based, but running in Alliance trucks on fixed routes with the units in cabs with full suspension as well? Has anyone validated the actual received data?) to 'tick the box' isn't cutting it when compared the practical evidence – get some crowdsourcing in, have residents use the tools! Getting an assessment team circulating on the roads with a quick-response team would be a better use of resources. Continual	That Council notes the submitter's feedback. The bulk of road works is driven by heavy vehicle activity. Council roading network does not suffer from congestion related issues. RoadRoid is used continually by both contractors and staff. Staff utilise RoadRoid to validate road condition and do a full gravel road network review. Long-term, this adds in understanding network performance. Renewals programmes are developed by utilising both computer modelling and field validation. Temporary traffic management requirements are set at a national level and the responsibility for reviewing these standards sits with Waka Kotahi NZ Transport Agency.

		monitoring (at better frequency than the yearly high-end surface testing) could feedback into meaningful choices, not an arbitrary replacement schedule. Of course, there is also rail available – has SDC considered strategic relationships in this direction? Infrastructure exists in most of western Southland still for this; being involved could always be seen as subsidizing one form of good haulage over another, but what's the difference to SDC ratepayers maintaining the roads/bridges to standards the Road Transport Users demand to maximise their own returns. Rein-in the STMS – fed up of seeing full traffic management out but not a human to be seen, yet presuming we're paying for all this equipment?	
Alan Bryce	2	Only where justified by traffic volume.	That Council notes the submitter's feedback.
Chantel Marshall	2	You have a budget, you need to stick to it. If roads require more funding then it must come from within your budget. How about you move out of a building that is about to cost 11mil. That's half the amount just there.	That Council notes the submitter's feedback.
Gemma Marnane	2	The proposal is set to increase investment in roads to allow "sustainable" kilometres of roads every year. I feel this term is misleading. We are already falling significantly behind on addressing sustainable development in transport, what I define should be centred around sustainable mobility. Additional money and commitment is needed to build and maintain rural road networks. This should be centred on sustainable rural transport services, and means we can focus on creating local solutions to local problems such as poverty, isolation, social exclusion and getting people into sustainable jobs which will be higher paying due to an increasing demand for transport. Fixing roads is moving away from centering changes more on people's "wellbeing" and "safety" in the long term. This means that instead of people sourcing their own vehicles for transport on roads, which is often expensive, unsustainable and inaccessible to our growing older population, youth and minorities, sustainable transport initiative will be integral to increase accessibility of transport for struggling groups and the general public without creating significant delays due to increased roadworks. This not only reduces the number of vehicles on our roads but also gives more space for safe transport, police monitoring and success of proper driving education programmes. Transport is integral for tourism, economic growth and allowing people to access jobs, services, education and the interactions that help create fulfilled lives. But sustainable transport, by extension, drives sustainable development, advancing the people-centred goals such as increasing wellbeing, connections and health outcomes and systems while protecting and preserving our district, our planet and its resources for generations to come.	That Council notes the submitter's feedback. The bulk of Council road network is aimed at getting produce to market. Council through shared services such as RoadSafety Southland invests in education and promoting road safety.

		Sustainable mobility includes creating demand for cycle tracks and lanes, introducing accessible ways to carpool, including the implementation of extensive education programmes and consulting people who live in isolated areas who rely on carbon for their jobs and transport. Safe walking opportunities and incentivising electric vehicles on our roads through introducing biofuels as a fuel alternative and targeting transport heavy industries on how resources can be distributed based on need and not on capital growth. This must begin with decreasing the price and stigma around travelling and our economy not being the centre, but people, especially making transport more safe, accessible and affordable for Māori, Pasifika and other minorities. We can utilise NZTA subsidies still this way.	
Imedla Sutherland	2	After taking my Dad to Tauranga x2 in the last 2 years - driving a rental Auckland south Southland already has fantastic roads to drive on.	That Council notes the submitter's feedback.
Peter Gutsell	2	Time to look at more use of rail from Western Southland = milk, logs, coal etc	That Council notes the submitter's feedback. These options have been explored with Kiwi Rail however some time critical products, such as milk, does not lend itself to this mode of mass transport.
General comments from submitters who didn't express a preferred option			
Jan Popham	Not stated	The consultation document provides estimates only, with little justification for any substantial increase in rates as proposed.	That the Council note the submitters feedback. Actual cost will only be known when the work is procured.
Bryan Barnes	Not stated	Where does the maintenance money from the cycle trail come from? Southland roads are the worst for having mud and stuff on them in NZ.	Council receives 50% match funding for operational costs (including maintenance) from MBIE.
Southland Chamber of Commerce	Not stated	There was a 50/50 split opinion between Option 1 (Invest an extra $1 million in the first year in road rehabilitations (total $4.2 million), then rising by an average of $2.5 million each year to a total of $18.9 million by 2030/2031) and Option 2 (Status quo - continue to spend $3.2 million per year on road rehabilitations) of our members who responded to the survey.	That Council notes the submitter's feedback.
Margaret Denny	Not stated	There is a problem of walkers and cyclists (e-bikers) using the same tracks. Would a law saying all bikes should have a bell/warning device to alert walkers to them help?	That Council notes the submitter's feedback. There is a cycle code that refers to the use of bells.
Nathan Burdon – Sports Southland	Not stated	The submission states Sport Southland is excited about the new Active Transport Innovator role being shared between SDC, Sport Southland, and the Invercargill City Council, with funding from Waka Kotahi/NZTA and are hopeful this can be extended beyond the initial investment.	That Council notes the submitter's feedback.
Pam York	Not stated	We have the biggest network of unsealed roads in the District, this is of significant concern to all our residents who reside on these, in particular the areas where there is significant heavy vehicle movements. We want our economy to continue to prosper, so we need to put in place realistic options. Bridges and roading are a significant part of our Communities Boards prosperity. We need to continue to invest in maintaining our infrastructure at a reasonable level. As mentioned we have the largest number of sealed and unsealed roads so this discussion is very important to us.	That Council notes the submitter's feedback and comments on the value roads and bridges provide to the economy.

Gravel road maintenance			
Christine Buchan	2	Roading is really important in our rural communities and in particular the gravel roads around the area require attention. Grading work not sufficient and doesn't last. Ends of gravel roads could be sealed.	That Council notes the submitter's feedback. Council does seal the ends/start of gravel roads but, due to the large scale of the road network, it will take decades to get around the entire network.
Mary Napper	1	Supports increasing spending on roads but hopes gravel roads will be looked after as well as sealed roads, without having to request service for gravel roads.	That Council notes the submitter's feedback. Without increased levels of investment, levels of service will be impacted.
John Davey	1	Roads, especially gravel ones, are the worst they have been for years, corrugated, most down to base rock or clay. Grading is only a short fix. Gravel has been applied occasionally but very thinly, more is required. More use of river gravel handy to roads needs to be used to reduce costs.	That Council notes the submitter's feedback. Council utilises a mix of gravel sources to balance cost of cartage and quality of locally available resource.
Warren Keen	1	I would quantify supporting option 1 by saying Council needs to look at issues with local roads. This includes grading options and choice of gravel used. Continued reuse of the fines creates road conditions that are unsafe (ruts on corners and soft spots - created by heavy loads). Roads are not dug out and replaced with the correct gravel, but graded over and 5 minutes later problem reoccurs.	That Council notes the submitter's feedback. Council regularly reviews how it can best-deliver appropriate levels of service within available budgets.
Carolyn Smith	1	Look at smarter ways to maintain gravel roads, they don't all have to be graded every time the grader is in the area and some roads could be sprayed especially those with low volumes of traffic.	That Council notes the submitter's feedback. The dynamic nature of gravel roads can make them challenging to manage. This, along with the scale of Council's road network may mean, from time to time, it is more cost-efficient to intervene sooner rather than later. Staff are unsure what is meant by 'sprayed'.
Maree Whitely	1	The standard of gravel used and amount of application on rural roads differs greatly even within districts let alone the province of Southland.	That Council notes the submitter's feedback. Council aims to provide a suitable, fit for purpose level of services, based on the use and function of the road.
Bryan Barnes	Not stated	Road surface on gravel roads are not being graded properly. Gravel moved but corrugations remain.	That Council notes the submitter's feedback.
Rating/funding for roads			
Lee Yasar	2	Notes that tourists are not paying for roading. Believes roading repairs should also be funded by rental vehicles, especially campervans.	That Council notes the submitter's feedback. Council does receive some funded back through 'Funding Assistance' from Waka Kotahi NZ Transport Agency. This funding comes from revenue such as RUCs and fuel excise taxes.
Shirley Cranstoun	2	Central government should be paying for this, not ratepayers.	That Council notes the submitter's feedback. Council will receive funding assistance rate of 52% which is administered by Waka Kotahi NZ Transport Agency on behalf of the MoT.
Christine Ellen Henderson	2	Government decisions to shift infrastructure funding to councils without the requisite funding, and the decision to allow heavy transport to use our roads, have resulted in councils having the financial and physical burden. The same inevitable result has occurred with bridges. Allocation of RUC, small population and a large province have added to problem.	That Council notes the submitter's feedback.

Jody R Muntz	2	Why should we pay more, it's the trucks and milk tankers that damage the roads.	That Council notes the submitter's feedback. Council's roading rate model seeks to provide a mechanism to best balance the cost of those doing the damage versus those gaining the benefit.
Peter Zessin	2	It is completely unjustified for residential rate payers to pay an average increase of 12% total rates, when the average increase for Farming is 7%, mining 1%, Commercial 7%, Dairy 4.75%, and Forestry 1% - when heavy vehicles are causing a lot of the damage.	That Council notes the submitter's feedback. Council currently collects it roading rates through a combination of a fixed rate and a differential rate. The differential portion is calculated using a model that accounts for the estimated tonnage and impact of the various industries.
Nathalie van Veen Pahl	1	According to the booklet option 1 represents 0.92% of your preferred overall rates increase of 10.15%, an increase I could agree with. Yet somehow our rates are up 20% - even higher than the highest proposed increase. How does that work? It is not okay.	That Council notes the submitter's feedback. The 2.49% referred to is purely for the additional funds for bridge replacements. The overall increase includes additional investment in our roading network and other infrastructure and other costs to meet increasing regulatory requirements.
John Barnett	2	For option 1, does not like the idea of budgeting on NZTA 52%. A change of government may alter grant.	That Council notes the submitter's feedback. The funding assistance rate has been confirmed for 2021/22.
Christopher Halder	2	Road user tax needed in Southland.	That Council notes the submitter's feedback.
Wynn Avery	2	Obtain more central government funding. This should be relative to the total amount of roading in Southland, not on a population basis.	That Council notes the submitter's feedback.
Bill Marshall	2	Keep RUCs in Southland before they get syphoned off to Auckland. The average diesel vehicle in Southland would use more khms per year than its Auckland counterpart because of the size of the district.	That Council notes the submitter's feedback. Council makes use of every opportunity presented to it to lobby for funding.
Don Egerton	2	Please tell me why the money generated by road users in Southland, which at a guess would be in excess of 26 million dollars (by the very transport that is wrecking our roads) is not available to repair roads.	That Council notes the submitter's feedback. A portion of this is made available through Funding Assistance Rate provide to Council from Waka Kotahi NZ Transport Agency.
Diane Fretter	1	It seems a lot of damage is caused by the ever-increasing number/weight of trucks. Roads were not built with the foundation to sustain this - repairs are not fixing the underlying issue - the road base. Consider increasing the rates collected from companies with large number of trucks - user pays.	That Council notes the submitter's feedback.
Larina Harris	1	High volumes and heavy truck movement to AB Lime will make our roads less safe and increase maintenance costs. If that initiative proceeds, disagree with passing extra costs on to locals.	That Council notes the submitter's feedback. Through the resource consenting process Council seeks to limit the risk/cost to rate payers versus those that benefit from the activity.
Max Fretter	2	Degradation of the SDC roads is from heavy haulage damage – milk tankers, logging trucks. Example, Waimatuku Flat road. Suggests an appropriate differential rating increase for at least Dairy & Forestry.	That Council notes the submitter's feedback. Council's current roading model does look to distribute the cost to users causing the damage. Council currently collects roading rates through a combination of a fixed rate and a differential rate. The differential portion is calculated using a model that accounts for the estimated tonnage and impact of the various industries.
Neil Paterson	Not stated	Roading Model does not work for Southland - Since introduced by NZTA we have had our roading budget cut year after year. This means we have had sweat the asset and pass more roading costs onto our ratepayers who can't afford to top up our roading budget any further. This is not a level	That Council notes the submitter's feedback. Council agrees that a reduction in the funding assistance rate adds additional burden on Council and its ratepayers. Council does and will continue to lobby Waka Kotahi NZ Transport Agency for funding.

		playing field as the South Island has a larger roading network but the North Island has more population. Not receiving sufficient funding to maintain our roading network. Unite with our South Island neighbours to stand up for what is ours, this cannot continue. Need to revert back to km based funding. We cannot afford to remain status quo, our roading network needs a large cash injection.	
AD Wilson	Not stated	Failure of the Councils Roading Rate Model to account for large amounts of freight moving on our roads. Council has no desire to include this data that can sourced from external agencies. This needs to be included as an option going forward.	That Council notes the submitter's feedback. Council currently collects it roading rates through a combination of a fixed rate and a differential rate. The differential portion is calculated using a model that accounts for the estimated tonnage and impact of the various industries.
Shirley Mouat	Not stated	Money should have already been set aside for this work.	That Council notes the submitter's feedback. Some funding has been set aside but the level and cost of work is greater than the values set aside. Over the decades the level of funding assistance received from Waka Kotahi NZ Transport Agency has also slowly decreased.
Kim Reilly – Southland Federated Farmers	1	Southland Federated Farmers is opposed to the large increases in rates proposed by SDC, especially over the first two years of the LTP, where rates will increase by 10.15% in 2021/22 and 10.18% in 2022/23, before easing off in later years. We believe more of the Transport activity's capital spending should be funded from increasing debt as opposed to the activity's operating surplus (which is vulnerable to economic shocks or excessive spending on non-core activities). Using more debt (and less rates) would take pressure off rates increases over the next two years.	That Council notes the submitter's feedback. Council considers the use of loans is appropriate where work occurs on an ad-hoc basis. The capital replacement programme required by roading in this plan is either consistent or increasing so Council considers it prudent to fund this on an annual basis.
Myles Greber	Not stated	Fundamental flaw in the roading rate charge? Information came to submitter quite late so I haven't had time to fully consider. Allocation of roading rates is not being apportioned fairly as significant roading 'catch up' costs are being applied over the 10 year period of the LTP. So the 'Heavy Vehicle Use' portion which is meant to apply to those who do most damage to the roads, is not being ramped up to match the larger roading rate total cost. This, I believe, has the effect of distributing more of the increased roading rate costs on to those paying the 'remaining road rating' i.e. everyone except those who cause the most damage. I don't know what the overall effect of this would be, but I think it important to make sure the correct 'users' are being charged for roading."	That Council notes the submitter's feedback. Council currently collects it roading rates through a combination of a fixed rate and a differential rate. The differential portion is calculated using a model that accounts for the estimated tonnage and impact of the various industries.
Cliff and Irene Barnes	1	Our roads are impacted by mainly milk tankers and logging trucks and if a way could be found to increase the road user charges on this sector it would lessen the rate take on domestic users. Perhaps an invitation, to the Roading Minister - take him over the Blackmount Hill and around the dairy farming areas would increase his knowledge.	That Council notes the submitter's feedback. Council's roading rate model does seek to achieve a degree of user pays by placing the bulk of costs on those who contribute to the bulk of the damage.

Bill Marshall	2	Increase Road user taxes on large heavy vehicles laden with milk and timber. If the Ohai to Invercargill railway is not overloaded use it and get heavy logging trucks reduced on the roads	That Council note the submitter's feedback. Central government policy determines the amount of levies collected and the amount that Council receives.
Quality of work completed /contractor effectiveness/management			
Emma	2	States that roading crews need to do their job correctly/ superior products needs to be used. Notes areas are needing to continually be redone, as seal lifts and holes develop within months. This needs to be reviewed prior to increasing rates as people are struggling. If rates are higher, social concerns will rise.	That Council notes the submitter's feedback. Council maintenance contracts do provide for risk-based approach to road works and trialling of new products. This can lead to some work needing to be redone, however, over the whole network, this approach results in greater value for money. There are also situations where work is done to make the road safe until a more permanent repair can be carried out, due to the need for more specialised equipment.
Leon Harrison	2	Notes that in his town the same bits of road are repaired every year. Suggests fixing it properly in the first place, instead of a rushed job.	That Council notes the submitters' feedback. Specific road information would be helpful as it would allow staff to investigate further. There are situations where work is done to make the road safe until a more permanent repair can be carried out due to the need for more specialised equipment or weather conditions.
Emma Peterson	2	It would be a better idea to investigate whether the roading crews are performing well, providing the best service and using the best product for our area. It seems often the same areas are being redone in short time periods.	
Jodi R Muntz	2	Fix the roads right the first time.	
Stuart Fowler	2	When you fix a road, fix it properly. Get engineers who know what they're doing. So many times you see the contractors back at the same hole fixing it over and over again. Fix it probably the first time.	
Travis Naylor	Neither	Fix the roads. Don't keep patching them. Do it once do it right. Stop wasting money digging up the road sides.	
Carole Elder	2	Council needs to look at the quality of workmanship that their contactors are doing on the roads first. That is costing more, as the roads are not lasting.	
Brian and Bev Evans	2	Instead of quick repairs, do the job properly and don't do same roads each year.	
Carolyn Smith	1	By all means invest more in the roads, but if they are being fixed, do it properly so repairs don't have to repeated over and over again.	
Jonathan Pidduck	2	Stop throwing money into patches near the end of the financial year and properly fix something.	
Jonathan Bringins	2	We appear to be applying bandages.	
Imedla Sutherland	2	I am concerned however that it seems often the same patch of road gets repaired - why is this happening?	
Sonya and Ian Crook - Natural Honey NZ Ltd	2	Against rise in rates to cover investment because Council is not holding contractors to account for their substandard road resealing, repairs and rebuilding. Examples are Blackmount Road, Orawia Clifton Road, Waiau St Manapouri. Believes contractors should be held to account and be made to remedy.	That Council notes the submitter's feedback. We will look into the specific roads that have been mentioned, but overall Council has a very high success rate for works carried out.

Carla Kupe	1	Concerns about Wallacetown Underwood highway repeatedly being fixed – seems a waste of money.	That Council notes the submitter's feedback. This is a State Highway and is not managed by Council. However we do liaise with neighbouring road controlling authorities and will be passing on your concerns.
Greg and Liz Weake	1	Support increased expenditure but unhappy with quality of new works. Loose gravel, heavy chip. Be tough on contractors regards quality.	That Council notes the submitter's feedback. Specific road information would be helpful as it will allow staff to investigate further. Council do carry out audits of works and new works in particular have key hold points that require inspections.
Noel and Margaret Curtin	Not stated	The method of rehabilitations needs to be redefined. Rehabilitation work being redone and after a very short time - 1 to 5 years. This isn't economic. The rehabilitation method needs to be investigated and improved.	That Council notes the submitter's feedback. Specific road information would be helpful as it will allow staff to investigate further or comment on. As part of Council's contracts there are warranty periods. These are generally 12 months. Rework as a result of any contractor performance is a cost on the contractor and not ratepayers.
Wendy Joy Baker	2	Money should be spent wisely on roading rehabilitations. On the road between Otautau and Nightcaps, the work has been going on too long, and the road is rough and possibly not good for vehicles.	That Council notes the submitter's feedback. Full road reconstruction is a time-consuming activity and the section in question is a long section.
Christopher Halder	2	Why are the roads that are being fixed needing to be fix again within a short time (for example the tar seal road into Winton, or our gravel road that has been fixed at least 4 times within the last 12 months and is still needing ongoing repair). Do we need to employ a better company than what we are using?	That Council notes the submitter's feedback. This is a State Highway and not managed by Council. Council will raise this issue with Waka Kotahi NZ Transport Agency.
Max Fretter	2	Observes (i) repairs in areas not needing them (ii) repairs that are failing within weeks (iii) repairs that seem 100% overkill, eg removal of stable basecourse that has been there decades when the only problem with the road was edge collapse due to overloaded, overwide H rated heavy trucks. SDC need to manage their contractors/contracts better – address real needs, not 'this work has been booked in so it gets done regardless'. Use contractors without conflicts of interest (including for assessment and repair).	That Council notes the submitter's feedback. Specific road information would be helpful as it will allow staff to investigate further. Works programmes are 'field validated' to help ensure appropriateness of timing of work versus network needs.
Andy and Pam Booth	2	The roads are designed for fail.	That Council notes the submitter's feedback.
Bryan Barnes	Not stated	Why do the roading contractors just move the gravel around but do not fix the corrugations and road surface.	That Council notes the submitter's feedback. Specific road information would be helpful as it will allow staff to investigate further.
Noeline and James Evans	2	If new sealing doesn't stand up to traffic it should be redone at contractors' expense not ratepayers.	That Council notes the submitter's feedback. Specific road information would be helpful as it will allow staff to investigate further or comment on. As part of Council's contracts there are warranty periods. These are generally 12 months. Rework as a result of any contractor performance is a cost on the contractor and not ratepayers.

Robyn Rogers	Not stated	Ensure that the roads being treated really need it! A year or two ago, William Stephen Road had some resurfacing done (not sure why) which resulted in lots of loose stones - causing damage to vehicles. This past summer, it needed more maintenance and more loose stones!	That Council notes the submitter's feedback. On average Council resurfaces sealed roads every 13 years to ensure they remain water proof.
Scott	2	Maybe you wouldn't have to spend so much on rehabilitating roads if they weren't being re-dug up within months to sort out new water mains or other infrastructure (predictable, planning issues). Looking at Invercargill, for example. Or disregarding local reporting statements of issues (eg water main leak) to send out three separate agencies who each take a look and say 'not 'our' problem'.	That Council notes the submitter's feedback. Council does liaise with other infrastructure providers however, as an example, from time to time funding opportunities arise such as the Central Government Funding stimulus package for three waters, which Council does not have visibility of until it is made available. This provides planning and logistical challenges.
Brian Church	1	Council must continue to push central Government for our fair share of funding. There is a lot of New Zealand south of the Bombay Hills and councillors must represent ratepayers not the people in Wellington.	That Council notes the submitter's feedback. Council does and will continue to lobby funding providers.
Affordability comments relating specifically to roading			
Dave den Hertog – Hedgehog concept	2	If option 2 requires lowering speed limits in the meantime, so be it. Revisit this again when we all have jobs.	That Council notes the submitter's feedback.
Hannah – Dunluce B&B	2	Agrees the proposed roading projects are important - but thinks they should be delayed a year due to covid circumstances.	That Council notes the submitter's feedback. Council explores and considers all avenues funding along with ways to maximise the life of assets.
Abby	2	The proposal for our roads will affect many people in Southland and is out of touch with what is happening in Southland. Insinuates concerns about affordability.	That Council notes the submitter's feedback.
Chris and Viv Shaw	2	Do not support any of the options proposed. The current economic climate has not been considered when presenting these options. The spend should at worst stay the same, at best be reduced.	That Council notes the submitter's feedback.
Wayne Muntz	2	Live within your means.	That Council notes the submitter's feedback.
Specific roads/cycleways			
Greg and Liz Weake	1	Concerns about the quality of the reseal of Riverton's main street.	That Council notes the submitter's feedback.
Anthony Marshall – Mokotua Service Centre	1	Suggests making the Milford Sound Road a toll road so it is user pays – as it's mainly used by tourists. $10 for a car and $50 for a bus. Would assist in the clearance and maintenance of the road. Rates contribution also.	That Council notes the submitter's feedback. This road is not managed and maintained by Council but by Waka Kotahi NZ Transport Agency. Council will however pass on your comments to Waka Kotahi NZ Transport Agency.
Carla Kupe	1	The Wallacetown corner by the dairy is an accident waiting to happen – blocked view. Mirror on the other side of the road is suggested.	That Council notes the submitter's feedback. Council is working with Waka Kotahi NZ Transport Agency on improving the situation at this location.
Phillip Leven	2	What happened to Hollyford-Haast Rd?	That Council notes the submitter's feedback. Council is not certain whether or not this road will progress, and the Transport team has

			not had any recent communications with other stakeholders about this road.
Faylene Ferris-Olasa	2	Supports sealing Otahuti Road and other roads affected by dust nuisance.	That Council notes the submitter's feedback. Council does recognise the impact the change to the Water and Land Plan has had on the affordability of home owners to manage dust in a cost effective manner.
Christine Buchan	2	Chewings road is constantly corrugated. Requests improving the Gore/Invercargill junction in the middle of Lumsden.	That Council notes the submitter's feedback. Gravel roads can be challenging to maintenance particularly when they see an increase in heavy vehicle activity. The intersection in the middle of Lumsden is the responsibility of Waka Kotahi NZ Transport Agency. Council will pass on your concerns to them.
Leah Elizabeth Boniface	1	Request upgrading the northern portion of Palmerston Street. Increased sales have increased traffic and would appreciate the sealing of the carriageway. When there is heavy rain, the open ditch along the street runs high and ponds on this side of the street. Kerb and channel would take run off and reduce the problem. Prolonged dry spells create a dust problem. Potholes develop near the give-way sign. Surely an engineered sealed street with drainage is not so difficult to complete.	That Council notes the submitter's feedback. Kerb and channel needs to connect in with appropriate storm water systems to be effective. Currently this section is not been assessed to be a high priority.
Vic Lanaway	1	William Street in Riverton is an absolute disgrace with its drainage ditch going down right hand side. Comments that rates have increased but no work has ever been carried out - would be nice to see some progress on this issue. There are no footpaths on William Street.	That Council notes the submitter's feedback. As there are limited funds, footpath investment is prioritised based on density of dwellings, traffic use and links to points of interested.
Lynne Dickie	Not stated	Dolamore Park Road - this road requires more regular grading and repairs and possibly something more long term to avoid worsening of the corrugations, this toad is dangerous at times because if the state of it. Please consider a long-term solution.	That Council notes the submitter's feedback. This road is the responsibility of Gore District Council, so Council will pass on the comments.
Brian and Bev Evans	2	People in Nightcaps have been waiting 15 years for Main Road to be replaced (resealed).	That Council notes the submitter's feedback. As this road is managed and maintained by Waka Kotahi NZ Transport Agency. Council will pass on the comments.
Noeline and James Evans	2	The cycle trail is a farce, scrap it. From Lumsden to Mossburn, over several years of driving, I have not seen 1 person using it on a bike. Stop DOC holding up Lake to Lake bike trail.	That Council notes the submitter's feedback. Analysis over 12 month period: counter installed at Mossburn indicates 1468 unique cyclist users; counter at Lumsden indicate 2059 unique cyclist users.
Tom Rouse and Sue Fuller	1	We feel the cycleway that travels from Kingston should be placed in a trust so that ratepayers are not funding it. Money spent on this cycleway should be used to continue to develop cycleways around and near Te Anau and other townships for the enjoyment of locals.	That Council notes the submitter's feedback. Work is being done to develop a potential trust structure and establish community leadership necessary to govern this.
Ann Pullen	Not stated	Requests a bylaw restricting the number of vehicles on the island, and how long they can park for.	That Council notes the submitter's feedback. Council will raise this with the Community Board as this needs to be considered as part of the broader community plan for the Island.

Attachment 2

Issue and options paper – Our bridges

Background

Council needs to consider whether to invest more in bridge replacements. This is in order to replace 161 bridges during the 10 years of the 2031 Long Term Plan (LTP).

As part of its consultation document, Council consulted on two options, being an increased investment to $3.5 million a year, or to continue to spend $2.5 million a year.

Transport Activity Management Plan

Staff have had a number of sessions discussing a Transport Activity Management Plan (AMP) with councillors, and received guidance to help formulate the AMP. The AMP identifies strategic issues, risks, and identifies the need for investment in the District's bridge network. The AMP was adopted on 10 March 2021 as part of the supporting information to the LTP consultation document.

The AMP identifies a number of emerging issues impacting Council's bridges that have been points of discussion for the LTP.

Emerging issues identified by staff

The key issues identified in relation to our bridges, are:

- 161 bridges are due for replacement over the ten years of the LTP
- the number of posted bridges (speed and/or weight restrictions) can be expected to increase in future years if the structures are not upgraded or replaced
- bridges are reaching the end of their lives without reaching their expected Remaining Useful Life (RUL), requiring accelerated assessment of the bridging network
- even with increased investment, some bridges may still have to be closed temporarily and there will be a need to prioritise the delivery of the replacement programme
- increase in heavy vehicle traffic accelerating bridge deterioration
- any changes to the availability of subsidy from Waka Kotahi New Zealand Transport Agency impacting the 'size' of the roading programme.

The consultation document

The preferred approach for 'our bridges' (as outlined in the AMP), was identified as being one of the major decisions being proposed by Council over the 10 years of the LTP. On this basis, 'our bridges' was included as one of the issues Council was keen to receive feedback on, in the LTP 2031 consultation document adopted by Council on 10 March 2021.

The consultation document presented options to the public on how Council could manage roads. These options were:

Option 1 - Council's preferred option

- increase spending on bridge replacements by $1 million, to a total of $3.5 million a year, over the next ten years.

Option 2 – status quo

- continuing to spend around $2.5 million each year to replace high-priority bridges that have reached the end of their lives.

Option 1 would enable Council to continue to accelerate its programme of replacing the 161 aging wooden bridges that are reaching the end of their lives and require replacement over the next 10 years. The advantages and disadvantages of this option are outlined below. This option comprises 2.49% of Council's proposed overall rates increase of 10.15%.

Option 2 would not enable Council to replace all 161 bridges that are identified as requiring replacement in the next 10 years, and will result in further permanent bridge closures. The advantages and disadvantages of this option are outlined below. For this option the preferred rates percentage increase would decrease from 10.15% to 9.11%.

Issues - summary of feedback

Of the 206 submitters who selected a preferred option, 46% supported increasing spending on bridges, and 54% supported continuing to spend around $2.5 million each year. Fifty-four submitters did not state a preferred option.

There were several themes in the written comments, including the greater impact of heavy vehicles on bridges and requesting Council consider alternatives to bridge replacement that are more cost effective, such as box culverts, speed restrictions and detours. Comments also discussed the difficult economic climate making the increase in rates to replace bridges a challenge, and noted the importance of bridges to Southland.

Submitters gave a number of reasons why they support increased spending (option 1), such as:

- bridges are fit for purpose
- there are no long term effects of bridge deterioration
- that bridges continue to provide critical links for communities.

Submitters who supported continuing to spend the same amount (option 2) also gave a number of reasons for their preference, including:

- concerns about peoples' ability to pay
- that money could be better spent in other areas.

Similar to comments on roading, some submitters believed there should be changes to how bridges are funded. Some submitters thought the heavy vehicle sectors and tourists should pay more and some felt there should be more government assistance (including the amount of road user chargers available in our District).

Level of service implications

Based on the large number of renewals required over the next 10 year period, the bridge matrix outlined in level of service section of the Roading Activity Management Plan (AMP) will be utilised as a decision making/prioritisation tool. There will be a need to prioritise the delivery of the replacement programme, irrespective of which option Council chooses.

The bridge replacement matrix is shown below.

NZTA ONRC (One Network Roading Classification)	Alternative Access Detour Length				
	20+km or No Access	15-20km	10-15km	5-10km	0-5km
Primary Collector					
Secondary Collector					
ACCESS					
Low Volume Access (11-50 vpd)					
Low Volume Access (0-10 vpd)					

	REPLACE (OR UPGRADE) BRIDGE
	REPLACE (OR UPGRADE) BRIDGE & CONSIDER DIVESTMENT
	REPLACE (OR UPGRADE) BRIDGE & CONSIDER DIVESTING WITH THIRD PARTY CONTRIBUTION
	CONSIDER REMOVING BRIDGE

If Council proceeds with option 1, the current levels of service for bridges will remain unchanged. If Council elected option 2, and chooses not to increase investment to bridges, the primary implication is a decrease in levels of service. This is because more bridges would be closed for a longer period of time, due to the lack of funding for replacement in a timely manner. The result would therefore not be as much a direct financial cost, but rather the indirect costs to people in the community of using an alternate route.

The 161 bridges that are due for replacement during the 2031 LTP period represent a 'peak' of largely timber bridge structures reaching their end of RUL. If replacement of these bridges is delayed due to maintaining the status quo funding levels, the effect on costs and funding is not as cumulative as it is for the district's roads. Whilst these bridges will still require replacement, there is not as high a number reaching their end of RUL after the ten years of this LTP. The next 'peak' of bridges requiring replacement is on or about 2050, when a number of concrete bridge structures will reach their end of RUL. However, while the next peak of bridge replacements is estimated at 30 years from now, the replacement cost for this group of bridges is even higher than the current cohort.

Options

Two options have been identified for how Council could proceed. These are:

- **option 1** - increase spending on bridge replacements by $1 million, to a total of $3.5 million a year, over the next 10 years.
- **option 2** - continuing to spend around $2.5 million each year to replace high-priority bridges that have reached the end of their lives.

Option 1 – increase spending on bridge replacements by $1 million, to a total of $3.5 million a year, over the next 10 years

Advantages	*Disadvantages*
• current levels of service are likely to be maintained. This means that: - replacement of 161 bridges over course of the LTP can progress - fewer temporary bridge closures - travel times are likely to remain the same/similar - a similar level of customer satisfaction is likely • Council would be able to keep on top of its bridge replacement programme, without a backlog of work.	• there would be a rates increase annually across the 10 years of the LTP of $1.2 million. Of Council's preferred overall rates increase of 10.15% in year one, 2.49% is attributable to this option • some changes to level of service may still occur • this option would not be in line with the majority of community views received on this matter.

Option 2 – continuing to spend around $2.5 million each year to replace high-priority bridges that have reached the end of their lives

Advantages	*Disadvantages*
• this option is in line with the majority of community views received on this matter • a reduction to rates required of $1.2 million, reducing the preferred rates percentage increase in 2021/22 from 10.15% to 9.11%.	• increased risk to public safety due to catastrophic bridge failure resulting in injury or death • Council would not maintain current levels of service. This means that: - some bridges may close permanently - more speed restrictions may be imposed - required rehabilitation repairs may become more noticeable - travel times may increase - the level of customer satisfaction may decrease.

Discussion/analysis

Analysis of the options has been explored during the development of the AMP and in the table above. The submissions received through the LTP consultation process have been in favour of option 2 - maintaining the status quo which would result in a lower level of service, with an increase in the number and duration of bridge closures. Option 1 would result in safer bridges for people travelling in the District, but this comes at a cost.

Recommendation

That Council:

a) **confirm increasing spending on bridge replacements by $1 million, to a total of $3.5 million a year, over the next 10 years**

Excerpts of feedback on 'our bridges'

Submitter No.	Opt pref	Submission summary	Staff recommendation
General comments from submitters who supported option 1			
Alistair Weir	1	Says that bridges are essential to our roading network so we must keep ahead of deterioration.	That Council note the submitter's feedback. Council is proposing increased investment to proactively keep on top of bridge deterioration.
Chris Sara	1	Says that there is no point fixing roads if bridges aren't fixed.	That Council note the submitter's feedback. Council agrees that the bridges form an integral part of the roading network and therefore appropriate investment in both asset types are required and being proposed as part of this LTP.
Hamish McMurdo	1	Has selected this option only if the work is completed in a timely manner.	That Council note the submitter's feedback. Council has been working with the industry to ensure they have capacity to deliver an accelerated larger programme of work.
Rod Sinclair	1	Believes there will be a long term negative impact on the whole of Southland if a good transport network is not maintained.	That Council note the submitter's feedback. The LTP is outlining the maintenance and capital renewal investment required to maintain the existing level of service (or improvements where bridges already have weight/speed restrictions in place).
Greg & Liz Weake	1	Says that work needs to be done as quickly as fiscally possible.	That Council note the submitter's feedback. Council has been working with the industry to ensure they have capacity to deliver an accelerated larger programme of work.
Ivan Dale	1	Believes this option speaks for itself.	That Council note the submitter's feedback.
Stephen Keach	1	Says that bridges need to be fit for purpose.	That Council note the submitter's feedback. A balance of managing risk and being fit for purpose are the two main considerations when considering bridge maintenance and renewals. Increased investment will allow for more emphasis on ensuring the bridges are still fit for purpose.
John and Lisa Hay	1	Option 1 is logical, not been able to use the provincial bridges is a poor reflection on Council.	That Council note the submitter's feedback. Fit for purpose access is a key consideration in the proposed increased investment.
Sarah Thoene	1	Supports options 1 given the current subsidy, and will help replace the majority of our aging bridge network.	That Council note the submitter's feedback. The funding assistance from Waka Kotahi NZ Transport Agency will be maximised to ensure the largest investment can be carried out at the minimum cost to the community.
David Boniface	1	Asks how Council have allowed such deterioration of their bridging stock. Suggests that processes are not robust and the maintenance funding model is flawed. Asks whether there are bridges that can be disposed of and access to some locations be via alternative routes? Supports funding to retain levels of service accessibility and that a long term funding plan should be developed.	That Council note the submitter's feedback. Historically there has been a big push to keep rates as low as possible and that has come at the cost of infrastructure starting to deteriorate. Council can no longer maintain the existing levels of service without increased investment as proposed in this LTP. A lot of work has been carried out in identifying what bridges could be disposed of if the community wish to keep rates down and ultimately rationalise the network for affordability.
Youth Councillors, SDC Youth Council	1	Discusses that new bridges will be more durable and therefore last longer which makes them a smart investment. This option would also help reduce restrictions and lengthy detours which are currently in place throughout the District by replacing or	That Council note the submitter's feedback. Durability and expected life from structures is a key consideration when reviewing the renewal programme. Whole of life costs are reviewed prior to any investment being committed.

		redeveloping 161 of them. While the increase in debt would be a negative, this is the better result in the long term to have bridges which are more sustainable and safer.	
Duncan Jennings	1	Believes all bridges in the district should be kept in good operating order and not close any.	That Council note the submitter's feedback. Council is proposing increased investment to proactively keep on top of bridge deterioration.
Leanne Liggett, Public Health South	1	Requests Council looks into adding a cycle lane to those bridges which would benefit in promoting active transport options for their surrounding communities.	That Council note the submitter's feedback. Active Transport and the community's wellbeing are key considerations in any infrastructure renewals. A lot of the proposed renewals are rural and remote but where appropriate cycle lanes will be considered.
Allan Baird	1	Bridges link communities and are critical infrastructure. Disappointed with under investment in this area in recent years.	That Council note the submitter's feedback. Fit for purpose access is a key consideration in the proposed increased investment. Historically there has been a big push to keep rates as low as possible and that has come at the cost of infrastructure starting to deteriorate. Council can no longer maintain the existing levels of service without increased investment as proposed in this LTP.
Colin Smith	1	Believes a balance needs to be established between maintenance verses replacement. Where maintenance is to be done it needs to match the life time of the bridge. When a bridge is replaced two lanes and or road realignment must be part of the mix.	That Council note the submitter's feedback. Council inspect all bridges and then prioritise maintenance/upgrade/renewal budgets to manage risk and spend where most appropriate. This takes into consideration the remaining life the structure has with or without the proposed investment. All bridges are reviewed when nearing end of life and being considered for renewal whether a single or two-lane replacement is appropriate and the approach alignment given the usage on the bridge.
Norman & Helen McLeish	1	Believes small country bridges are used to connect with neighbours and other farmers. Keeping lots of machinery being driven on main roads and holding up the flow.	That Council note the submitter's feedback. Increased investment is required to ensure fit for purpose accessibility can be maintained where appropriate.
Sarah Greaney, Fiordland Community Board	1	Recognises the need for bridge replacement. Questions the certainty of each bridge requiring replacement within a 10-year timeframe when spreading the workload over 12 – 15 years might be viable. Is Council certain that a bridge earmarked for replacement in years 8 to 10 will actually require replacement at that point? The board therefore supports option 1, only if Council can assure the board that further options for spreading the cost beyond the next 10 years has been fully investigated.	That Council note the submitter's feedback. Determining the remaining useful life of structure is an art rather than a science. The immediate programme has some engineering certainty around it, but further out (year 8-10 as you say) could go either way (earlier or later) depending on a number of factors the bridge is subjected to over the next few years. Balancing the renewal profile to achieve a reasonably flat line expenditure (spreading the cost) is something we are certainly doing across the board (all services and asset types) where achievable.
Maree Whiteley	1	Believes that as with any business upkeep is necessary, spend now to save more expensive options in the future.	That Council note the submitter's feedback. Consideration is given to all replacements for what is the most economical solution (considering whole of life cost) and the most appropriate time to invest.
Les Scown	1	Believes that NZTA subsidy should be used to the maximum. Find more money from the community board projects. The bridges will never be cheaper to replace than now.	That Council note the submitter's feedback. The funding assistance from Waka Kotahi NZ Transport Agency will be maximised to ensure the largest investment can be carried out at the minimum cost to the community.

Bryan Barnes	1	Request that Council spend the budget wisely	That Council note the submitter's feedback. Consideration is given to all replacements for what is the most economical solution (considering whole of life cost) and the most appropriate time to invest.
Imelda Sutherland	1	Believes all bridges must be maintained.	That Council note the submitter's feedback. Council is proposing increased investment to proactively keep on top of bridge deterioration.
Wendy Knowler	1	Discusses that if bridges are not safely accessible this means long term detours for residents more and fuel used for longer journeys in the long run not good environmentally.	That Council note the submitter's feedback. Alternative detour length and appropriateness is a consideration when prioritising the replacement programme. The outcome of what budget is made available will ultimately determine whether the detours are short or longer term.
Beverley Osborn	1	Believe that Southland ratepayers have a responsibility contribute to funding for the tasks, even though unlikely ever to travel on most of the roads and bridges in need of upgrade. Similarly Southlanders, who have never visited Stewart Island and have no desire to do so in the future, will be contributing through their rates to work carried out on Rakiura.	That Council note the submitter's feedback. The proposed rates increase entails access to the entire districts roading/bridge network and not just the roads that impact individual users.
AD Wilson	1	Discusses making the required repairs to enable their continued use, and use technology to drive behaviour change.	That Council note the submitter's feedback. Council is proposing increased investment to proactively keep on top of bridge deterioration. Technology has been considered to help change driver behaviours but is easier said than done - Council welcome any feedback or suggestions in this space.
General comments from submitters who supported option 2			
Diane Gibson	2	Opposed to single lane bridges.	That Council note the submitter's feedback. All bridges are reviewed when nearing end of life and being considered for renewal whether a single or two-lane replacement is appropriate given the usage on the bridge.
Cliff and Irene Barnes	2	Consider two lane bridges where possible.	That Council note the submitter's feedback. All bridges are reviewed when nearing end of life and being considered for renewal whether a single or two-lane replacement is appropriate given the usage on the bridge.
Emma	2	Believes that bridges need assessed as to use and importance then graded for fixing.	That Council note the submitter's feedback. Council inspect all bridges and then prioritises maintenance/upgrade/renewal budgets to manage risk and spend where most appropriate. This takes into consideration the importance of the structure to the overall roading network.
Shirley Paterson	2	Discusses that the state of bridges has not happened overnight and asks who/what department in council has allowed this to happen? Asks whether inspections were not carried out/repairs undertaken, hence massive spend needed? Closed bridges place a considerable burden on farmers/communities.	That Council note the submitter's feedback. Historically there has been a big push to keep rates as low as possible and that has come at the cost of infrastructure starting to deteriorate. Council can no longer maintain the existing levels of service without increased investment as proposed in this LTP. Bridges are inspected and assessed by structural engineers on behalf of Council and the outcome of these inspections dictate the maintenance and renewal programmes. Options between enhanced maintenance/upgrades vs renewal are analysed prior to any investment considering whole of life costs.
Katie Jones	2	Believes that this event was foreseeable and Council has not given the public any information regarding any assessment and valuation resulting in a priority report on	That Council note the submitter's feedback. Council is seeking the community's appetite through the LTP process to investing to replace all structures to maintain the existing level of service provided long term; or rationalising the network where

		which bridges are in need of replacement first and on traffic count/interruption etc. Asks how rate payers can make an informed decision?	acceptable alternative detours are available at a lower investment. The available funding obtained will then be prioritised and the impacts quantified.
Jenny and Tony Tippet	2	Does not consider that there are any bridges that require significant repair.	That Council note the submitter's feedback. Bridges are inspected and assessed by structural engineers on behalf of Council and the outcome of these inspections dictate the maintenance and renewal programmes.
Andre Bekhuis, Wallace Takitimu Community Board Chair	2	Believes it is important to future proof these assets. They will also need a consistent maintenance plan for the future.	That Council note the submitter's feedback. It is acknowledged that an increased maintenance investment is required to extend and achieve expected bridge lives. This has been allowed for in the proposed LTP.
Christopher Halder	2	Would like to know why has there not been money being put aside to fix these bridges, and suggests outsourcing contractors. This problem has not just arrived this year, asks who is responsible for previous decisions on where this money was spent	That Council note the submitter's feedback. Historically there has been a big push to keep rates as low as possible and that has come at the cost of infrastructure starting to deteriorate. Council can no longer maintain the existing levels of service without increased investment as proposed in this LTP.
Nigel Humphries, Anchorage Motel	2	Requests that Council not spend any more at present and look at long term options - doesn't need to be fixed overnight.	That Council note the submitter's feedback. Acknowledge that we need to consider long term sustainability impacts.
Carole Elder	2	Requests evidence of where and how the $2.5 million per year on bridges was spent.	That Council note the submitter's feedback. Over 20 structures have been replaced over the last 18 months since the issue has been identified and started to being addressed. These site locations can be requested.
Bevan Webster	2	Believes there is nothing wrong with most of the bridges in Southland.	That Council note the submitter's feedback. Bridges are inspected and assessed by structural engineers on behalf of Council and the outcome of these inspections dictate the maintenance and renewal programmes.
Jaspreet Boparai	2	Would like to know how many bridges were replaced during the last LTP period.	That Council note the submitter's request. 47 bridges have been replaced to date during the last 10 years with a few more still under construction expected to be completed by end of June to fit within this LTP period. These site locations can be requested if required.
CR & JL McCrostie	2	Instead of following a maintenance schedule, Council has wasted money on cycle trails that are not used and should be user pays as they are for leisure.	That Council note the submitter's feedback.
Edward Charlton	2	Reduce the staff levels by removing 50% there who are simply bureaucrats with no true value but still on hefty salaries, then no need to "invest more" as the funds will be freed up. All performance reviews need to be made public.	That Council note the submitter's feedback.
Chris and Viv Shaw	2	This part of the consultation process is deeply flawed. None of the options supported, as these are not the only	That Council note the submitter's feedback. After careful consideration Council decided to consult on two options about bridges. Council had to present key issues to

		options available. Council is attempting to produce favourable statistics from its limited range of options.	people in the district, but to also consider how user friendly and understandable the consultation document would be for readers.
General comments from submitters who didn't express a preferred option			
Travis Naylor		Supports neither option. Believes that small bridges should be replaced with box culverts instead, to reduce costs. Bridges on roads going to DOC land should be funded by DOC, not ratepayers.	That Council note the submitter's feedback. Consideration is given to all replacements for what is the most economical solution (considering whole of life cost) and being fit for purpose. Box culverts have been installed in numerous locations around the district over the last few years to replace small bridges and will continue to be considered as options but consenting challenges are also a consideration. Council will only invest in bridges on Council owned and maintained roads.
Noel and Margaret Curtin		Believes maintenance on some bridges is poor.	That Council note the submitter's feedback. Increased investment is required to keep on top of all the required maintenance district wide which is what is being proposed in this LTP.
Southland Chamber of Commerce		There is a 50/50 split between option 1 and option 2 of members who responded to the survey.	That Council note the submitter's feedback.
Impact of different users on bridges			
Ivan Fitness	1	Discusses that bridges that can handle increased loads are essential for economic development. Tractors and trucks get bigger every year and we all benefit when one tractor does a quicker job (less fuel etc.) than a tractor or tractors of previous generations/models.	That Council note the submitter's feedback. Council acknowledge that the vehicles utilising the roading network are getting bigger and heavier and this has been a contributing factor to the accelerated deterioration of the assets we are observing. Fit for purpose accessibility is a key consideration for all proposed renewals.
Vic Lanaway	1	Logging trucks are destroying roads, bridges, lower carrying weight, open up rail use for logging.	That Council note the submitter's feedback. Council acknowledge that the vehicles utilising the roading network are getting bigger and heavier and this has been a contributing factor to the accelerated deterioration of the assets we are observing. A challenge Councils faces is getting the balance right between what the network can handle vs the economic benefits of moving goods and services on the network in a more efficient manner. Utilising rail comment noted.
WF Doherty	1	Request how much damage do milk tankers do, and whether Council gets the necessary road user tax back from the government.	That Council note the submitter's feedback. Council acknowledge that the vehicles utilising the roading network are getting bigger and heavier and this has been a contributing factor to the accelerated deterioration of the assets we are observing. A challenge Councils faces is getting the balance right between what the network can handle vs the economic benefits of moving goods and services on the network in a more efficient manner. Waka Kotahi Transport Agency collect road user charges (RUC) and Council does not have jurisdiction over the amount of RUC collected.
Diane Fretter, Otautau Guide Club	1	Believes that it is trucks, not cars, which are causing damage. And with the detours due to substandard bridges, even more roads are being damaged by heavy trucks	That Council note the submitter's feedback. Council acknowledge that the vehicles utilising the roading network are getting bigger and heavier and this has been a contributing factor to the accelerated deterioration of the assets we are observing. It is noted the impacts it has on alternative routes when detours are deployed.
Max Fretter	2	Request that a differential rate is applied for heavy haulage if they/their customers (dairy, forestry) require special accommodation.	That Council note the submitter's feedback. RUC are collected at a central government level from Waka Kotahi Transport Agency. Council currently collects it roading rates through a combination of a fixed rate and a differential rate. The

			differential portion is calculated using a model that accounts for the estimated tonnage and impact of the various industries.
Scott	2	Requests that Council charge the companies who cause the most damage to the bridges, heavily laden transport trucks. Perhaps do what Waianiwa has had to do, downgrade its bridge to light traffic and a heavy vehicle detour.	That Council note the submitter's feedback. Council currently collects its roading rates through a combination of a fixed rate and a differential rate. The differential portion is calculated using a model that accounts for the estimated tonnage and impact of the various industries. Utilising detours where available for heavy traffic movements is an option and has been deployed at Waianiwa as identified, however the impacts this causes on the detour roads has to be quantified and considered.
Peter Zessin	2	Discusses that the cost for bridge repairs should be reduced for residential rate payers, and the burden placed more on industry groups. The reliance on heavy transport vehicles throughout Southland is causing much of the damage to existing bridges, so these costs should be increased proportionately to farming, mining, commercial, dairy, and forestry rates. It is completely unjustified for residential rate payers to paying an average increase of 12% total rates, when the average increase for farming is 7%, mining 1%, commercial 7%, dairy 4.75%, and forestry 1%. Shift the cost of bridge repairs onto the user groups who are doing the most damage, not light vehicles doing most of it.	Council note the submitter's feedback. Council currently collects it roading rates through a combination of a fixed rates and a differential rates. The differential portion is calculated using a model that accounts for the estimated tonnage and impact of the various industries.
Shirley Mouat		Believes that money should have been set aside for these.	That Council note the submitter's feedback. Historically there has been a big push to keep rates as low as possible and that has come at the cost of infrastructure starting to deteriorate. Council can no longer maintain the existing levels of service without increased investment as proposed in this LTP.
Alternative approaches to preferred option			
Glyn Saunders	2	Appreciates the need for safe roads and bridges, but believes expectations should be matched with the cost these create. Slower speeds not the end of the world. If you want high-end highways move to a city.	That Council note the submitter's feedback. Fit for purpose access is a key consideration in the proposed increased investment. If access can be managed by other means such as speed and weight restrictions; this will be the preferred solution.
Faylene Ferris-Olasa	2	Doesn't believe a bridge should be replaced if it is not being used or has very little use. Close bridges if necessary, as there will be alternative routes made available.	That Council note the submitter's feedback. The bridge usage and alternative detour length and appropriateness is a consideration when prioritising the replacement programme.
Mary Napper	2	Accepts that there is a bridge maintenance problem, but says there are other ways of dealing such as rerouting traffic, which may mean a longer trip, or making a bridge one lane.	That Council note the submitter's feedback. The bridge usage and alternative detour length and appropriateness is a consideration when prioritising the replacement programme. All bridges are reviewed when nearing end of life and considered for renewal whether a single or two-lane replacement is appropriate given the usage on the bridge.
John Barnett	2	Discusses climate change and suggests looking at changes in providing crossings of the existing streams and rivers. Greater extremes in weather events are	That Council note the submitter's feedback. Capacity of structures to perform under significant weather events is always considered during renewals. Concrete fords and

		causing greater costs. Suggests building long and high bridges and laying down concrete fords so that in a flood scenario there is no obstruction of water by a bridge. These would be less cost to the rate payer.	other innovative low construction cost options are considered where appropriate but consenting challenges are also a consideration.
Pat Killeen	2	Requests that more bridges need weight and speed restrictions. Southland has a huge road network and the district can't afford to replace bridges unless they are unsafe.	That Council note the submitter's feedback. Fit for purpose access is a key consideration in the proposed increased investment. If access can be managed by other means such as speed and weight restrictions, this will be the preferred solution.
Anita Geeson		Discusses that before committing to a bridge replacement hard questions need to be asked. Is this bridge still essential and of value to the district? Believes better roads may make alternative access more realistic. Requests that any bridge replaced needs to have climate change mitigation in the plan and be suitable for future demands.	That Council note the submitter's feedback. Alternative detour length and appropriateness is a consideration when prioritising the replacement programme. The economics of upgrading an alternative detour over replacing an existing bridge is a consideration if the community accepts that all bridges aren't required to maintain fit for purpose accessibility. Capacity of structures to perform under significant weather events is always considered during renewals.
Neville Lindsay	1	Requests that as many bridges as possible be replaced with box or round culverts, due to time and cost savings. Requests Council get more than 3 or 4 quotes.	That Council note the submitter's feedback. Consideration is given to all replacements for what is the most economical solution (considering whole of life cost) and being fit for purpose. Large culverts have been installed in numerous locations round the district over the last few years to replace small bridges and will continue to be considered as options but consenting challenges is also a consideration. Council's procurement policy means that multiple quotes will be sought or go to open competitive tendering.
Alistair Faulknor	2	Believes that bridges will last longer if there is a limit put on vehicles numbers and strict weight limits.	That Council note the submitter's feedback. Fit for purpose access is a key consideration in the proposed increased investment. If access can be managed by other means such as speed and weight restrictions; this will be the preferred solution. Compliance with these restrictions have proved challenging historically.
Ann Robbie, Ryal Bush Community Centre	1	Any bridge that needs upgraded should be categorized and prioritized. There is absolutely no need for a double lane bridge on any gravel or lesser used road. Any bridge that is not up to standard should be 'speed restricted'. We can all slow down and proceed with caution when necessary.	That Council note the submitter's feedback. All bridges are reviewed when nearing end of life and considered for renewal whether a single or two-lane replacement is appropriate given the usage on the bridge. If access can be managed by other means such as speed and weight restrictions; this will be the preferred solution.
John Davey	1	Believes increased use of culvert pipes would be a cost effective alternative to bridges where flows are smaller.	That Council note the submitter's feedback. Where appropriate (catchment and capacity size allows) small bridges have been replaced with large diameter culverts and Council will continue to do so.
Carolyn Smith	1	Requests replacement of some of the one lane bridges with box culverts. This would be a cheaper option in the long term.	That Council note the submitter's feedback. Box culverts have been installed in numerous locations around the district over the last few years to replace small bridges and will continue to be considered as options but consenting challenges is also a consideration.
Denis and Ngaire Bartley	2	Believes that if rail becomes the major form for transporting of products then only major bridges will need to be upgraded.	That Council note the submitter's feedback. Rail is certainly an option for removing some heavy vehicles from the transportation network, however there are a large number of structures in the District that have no alternative detours and therefore

			need upgraded/replaced to maintain accessibility. Usage of any structure is reviewed prior to any investment to ensure that the upgrade/renewal is in fact warranted.
Alan Bryce	2	Says that bridges should only be replaced where justified by traffic volume	That Council note the submitter's feedback. Traffic volume is certainly a consideration in prioritising the available budget for bridge renewals however accessibility is also a key consideration. There are a large number of structures that do not have alternative detours available and hence investing in these bridges is the only option to maintaining this desired access.
Gemma Marnane	1	Suggests more sustainable bridges to allow balance which is supply – demand. Invest in management and giving creative freedom to engineers from around the country to not just copy standard designs. These bridges could include spaces for walking, biking and sustainable transport lanes such as buses for example.	That Council note the submitter's feedback. Council support the idea of innovation around bridges designs and construction methodologies to keep costs down. Active Transport considerations are also supported where they usage type creates such demand.
Peter Gutsell		Request that a continuous bridging program as was in place under Wallace restarted. Keep road transport max 40 tonnes	That Council note the submitter's feedback. A continuous bridging programme has been developed as outlined in this LTP and Council seeking the budget to deliver it. Council acknowledge that the vehicles utilising the roading network are getting bigger and heavier and this has been a contributing factor to the accelerated deterioration of the assets we are observing. A challenge Councils faces is getting the balance right between what the network can handle vs the economic benefits of moving goods and services on the network in a more efficient manner.
Sandra Cooper	1	Believes money can be saved elsewhere by using different options and money that is being spent on unnecessary things can be reallocated. Central government funding and a tourist tax should be used.	That Council note the submitter's comment. Council does and will continue to lobby central government for funding where appropriate.
Stuart Fowler	2	Believes that funds should be spent where needed, rather than bridge barriers, unnecessary road maintenance, unnecessary vehicle use and unnecessary traffic controlling road construction.	That Council note the submitter's feedback. A balance of investment across all roading activities is sought to provide a fit for purpose, safe transportation network.
Wendy Joy Baker	2	Requests that funds spent on arts and sports, not just bridges.	That Council note the submitter's request.
Wynn Avery	2	Suggests obtaining more central government funding in line with the total amount of roading/bridges in Southland not on a population basis.	That Council note the submitter's feedback. Council will receive 52% funding assistance of the bridge upgrades/renewals from Waka Kotahi NZ Transport agency. Exploration for more financial support from central government is ongoing.
Peter Hogg	2	Bridges should be paid by the tax we pay on fuel and RUC.	That Council note the submitter's feedback. The portion of funds that Council receive from road user levies is used to fund the roading programme. However, central government policy determines the amount of levies that Council receives.
Graeme Stuart, Chairperson, Oraka Aparima	1	Given some people may not be able to afford rates increases, would like an option for funding bridges via loans, as council has access to lower cost borrowing than ratepayers would have. Believes that as bridges are a longer term asset, it may be appropriate to fund with a mix from borrowing. Prefers option 1, with an	That Council note the submitter's feedback. Council considers the use of loans is appropriate where work occurs on an ad-hoc basis. The capital replacement programme required by roading in this plan is either consistent or increasing so Council considers it prudent to fund this on an annual basis.

Community Board		alternative funding stream, and consequent reduction in the rate increase.	
Chantel Marshall	2	Believes that Council needs to find this $1 million within its budget.	That Council note the submitter's feedback.
Shirley Cranstoun	2	Suggests more creative options should be pursued if $2.5 million is not enough, such as using labour from corrections facilities.	That Council note the submitter's feedback and will continue to review procurement processes to gain efficient and effective use of ratepayer funds.
Kim Reilly, Southland Federated Farmers	2	Believes bridges are core infrastructure but SFF does not support the resulting rates impact. Believes more of the Transport activity's capital spending should be funded from increasing debt as opposed to the activity's operating surplus (which is vulnerable to economic shocks or excessive spending on non-core activities). Using more debt (and less rates) would take pressure off rates increases over the next two years.	That Council note the submitter's feedback. Council considers the use of loans is appropriate where work occurs on an ad-hoc basis. The capital replacement programme required by roading in this plan is either consistent or increasing so Council considers it prudent to fund this on an annual basis.
Quality of work completed			
Jody R Muntz	2	Inferior grade steel has been used for bridges, necessitating replacement. The cost to replace them should not be borne by the rate payer.	That Council note the submitter's feedback. Bridges are inspected and assessed by structural engineers on behalf of Council and the outcome of these inspections dictate the maintenance and renewal programmes. Inferior grade steel being the factor necessitating replacement has not been identified by these engineers as a contributing factor.
The financial impacts of Covid-19 and affordability, paying too much			
Lee Yasar	2	Believes that Te Anau gets huge rates charges and very little back from SDC. Requests to know what will Te Anau residents get if they pay more	That Council note the submitter's feedback. The rates increase in regards to bridges are spread district wide enables all users access to the entire Southland District Council roading network.
Kiri Klein	Neither option	Believes that bridges are not a priority for ratepayers. Requests investigating the impact of a rates increase of this magnitude through other avenues.	That Council note the submitter's feedback. Council does and will continue to lobby Waka Kotahi NZ Transport agency for funding. Delaying investment in the core infrastructure now (even for just a year) exacerbates affordability in future years.
Leon Harrison	2	Discusses that bridges have been in bad state of repair for many years, left to deteriorate, and that now because they are not reparable they need to be replaced. Believes that the cost to replace them should not be borne by the rate payer.	That Council note the submitter's feedback. Historically there has been a big push to keep rates as low as possible and that has come at the cost of infrastructure starting to deteriorate. Council can no longer maintain the existing levels of service without increased investment as proposed in this LTP. Options between enhanced maintenance/upgrades vs renewal are analysed prior to any investment.
Paul Evans	2	Says that roads and bridges have been neglected causing current issues. Believes that there has not been enough checks and balances on funds spent.	That Council note the submitter's feedback. Historically there has been a big push to keep rates as low as possible and that has come at the cost of infrastructure starting to deteriorate. Council can no longer maintain the existing levels of service without increased investment as proposed in this LTP. Options between enhanced maintenance/upgrades vs renewal are analysed prior to any investment.
Hannah	2	Agrees these are important projects but would like them to be delayed a year due to Covid-19 circumstances.	That Council note the submitter's feedback. Council acknowledge the significant impacts of Covid-19. Delaying investment in the core infrastructure now (even for just a year) exacerbates affordability in future years.

Wayne Muntz	2	Live within your means.	That Council note the submitter's feedback.
Brendan	2	Thinks the need for increased investment in bridges is due to money being spent on unnecessary items rather than being set aside for upgrades.	That Council note the submitter's feedback. Historically there has been a big push to keep rates as low as possible and that has come at the cost of infrastructure starting to deteriorate. Council can no longer maintain the existing levels of service without increased investment as proposed in this LTP.
Douglas Agnew	2	Sees no reason to increase spending and suggest less should be spent on bridges.	That Council note the submitter's feedback. This is an option but will come at the cost of bridges being closed and large detours being implemented to maintain access.
Sandra Cooper	1	Believes that rate payers cannot be the sole funding source for the increase.	That Council note the submitter's feedback. Council will receive 52% funding assistance of the bridge upgrades/renewals from Waka Kotahi NZ Transport agency.
Richard Xhemali Kulla	2	Discusses that any rates increase is inappropriate due to Covid-19 - give people 3 years to get back on their feet, especially those in the tourism industry. Asks how will Council make this proposed increase fairer to people with disabilities or mental health problems? – a rate rebate adjustment would be preferred if you increase rates as suggested.	That Council note the submitter's feedback. Council acknowledge the significant impacts of Covid-19. Delaying investment in core infrastructure now (even for just 3 years) significantly exacerbates affordability in future years. The draft remission and postponement of rates policy has been reviewed and consulted on concurrently with long term plan. The draft policy has included the ability to provide remissions for significant extraordinary circumstances. Council will be deliberating and adopting this policy in June.
Chris and Viv Shaw	2	Believes that the current economic climate has not been taken into account when presenting these options. The amount spent should at worst stay the same, at best be reduced.	That Council note the submitter's feedback. Council acknowledge the significant impacts of Covid-19 and the resulting economic climate. Delaying investment in the core infrastructure now significantly exacerbates affordability in future years.
Stephen Keach	1	Believes that it is unjust to hold ratepayers to ransom by closing bridges. Asset sweating has been occurring at Council for some time, and the consequences of that are being felt now. It is positive to see medium to long term planning occurring now.	That Council note the submitter's feedback. Historically there has been a big push to keep rates as low as possible and that has come at the cost of infrastructure starting to deteriorate. Council can no longer maintain the existing levels of service without increased investment as proposed in this LTP.
Le-Anne (Lee) Murray	1	Is happy to pay a rate increase that is considerate to all in the district. On p.24 of the CD there are rate increases (decrease) ranging from -2% to 16%. If the bridges throughout the District are for all to use, then how does one ratepayer pay less and another rate payer pay more?	That Council note the submitter's feedback. With over 130 rate types the impact on each property can vary significantly. The percentages on page 24 reflect the total change for district, local and service rates on each sample property. The roading rate is part of the District rates.
Carla Brockman	2	Says that this is not the time to consider an increase in spending. Spending should be restricted to essentials.	That Council note the submitter's feedback. Council acknowledge the significant impacts of Covid-19 and the resulting economic climate. Delaying investment in the core infrastructure (considered essential) now significantly exacerbates affordability in future years.
Christine Ellen Henderson	2	Believes that roads and bridges are strategic resources and should be funded by government, as should water infrastructures, with council consultation.	That Council note the submitter's feedback. Council will receive 52% funding assistance of the bridge upgrades/renewals from Waka Kotahi NZ Transport agency. Exploration for more financial support from central government is ongoing.
R L Pearson	Neither option	Supports neither option, the rate increase should be no more than the rate of inflation.	That Council note the submitter's feedback. Council considers affordability of the work programme presented and looks to balance it with the regulatory requirement and level of service it looks to provide to the community.

Nathalie van Veen Pahl	1	States that this option represents 2.49% of your preferred overall rates increase of 10.15%, an increase I could agree with. Requests to know why rates are up 20% even higher than the highest proposed increase, and does not support that level of increase.	That Council note the submitter's feedback in relation to the overall rate increase. The 2.49% referred to is purely for the additional funds for bridge replacements. The overall increase includes additional investment in our roading network and other infrastructure and other costs to meet increasing regulatory requirements.
Graeme Stuart, Chairperson, Oraka Aparima CB	1	Believes that roads and bridges are core functions of council, and therefore expect that these should have been and continue to be a priority. Some people may not be able to afford rates increases, we would like to have seen an option for funding bridges via loans.	That Council note the submitter's feedback. Council considers the use of loans is appropriate where work occurs on an ad-hoc basis. The capital replacement programme required by roading in this plan is either consistent or increasing so Council considers it prudent to fund this on an annual basis.
Brian and Bev Evans	2	Says that small steps are better than no rates able to be paid.	That Council note the submitter's feedback.
Brian Church	2	Discusses that all issues cannot be addressed at any one time as this places too big a burden on the ratepayers. More efficient use needs to be made of funds available.	That Council note the submitter's feedback. Council support innovation to generate efficiencies around bridge designs and construction methodologies to keep costs down. However increased investment on top of existing budgets is required to maintain the existing level of service desired.
SD Payne	2	Says that NZ has a 1 billion debt and ratepayers cannot afford an increase in rates above last years increase	That Council note the submitter's feedback. Council considers affordability of the work programme presented and looks to balance it with the regulatory requirement and level of service it looks to provide to the community.
Comments on specific bridges			
Rod Sinclair	1	Channel Road is currently restricted to heavy traffic. Whilst there is less traffic on the road, it has a negative impact for the farming activity in the area and increases costs for transport and contractors.	That Council note the submitter's feedback. Channel Road bridge has been restricted to light vehicles only to manage risk while providing some accessibility in the short term. This bridge is a priority replacement this LTP subject to obtaining the funding requested.
Fleur Harding	2	A Tuatapere bridge has been in need of a clean-up and repairs for some time and hasn't been done.	That Council note the submitter's feedback. Public have the ability to lodge a request for service (RFS) through Council's 0800 number (0800 732732) or the website (https://www.southlanddc.govt.nz/). Staff will contact submitter directly as to whether an RFS is appropriate.
Noel and Margaret Curtin		Maintenance on some bridges is poor. - ie a bridge on the Wreys Bush - Mossburn Highway over Al Creek and road subsidence on the south end of the bridge. Over a period of time the subsidence worsened until there was a large difference in road height and bridge height. There were no signs in either direction to indicate the danger at the bridge. It took over a year to repair a dangerous situation.	That Council note the submitter's feedback. Public have the ability to lodge a request for service (RFS) through Council's 0800 number (0800 732732) or the website (https://www.southlanddc.govt.nz/). Please lodge a request for service (RFS) to Council with the specific details of any concerns you have with specific bridges and their maintenance in the future. This will ensure that it is captured in Councils system for action.
Norman & Helen McLeish	1	Need major plan to repair and replace bridges (Waianiwa Bridge) Thomson crossing Bridge / McLeish Road bridge for example. Waianiwa Bridge is a main route to Invercargill with a lot of traffic on it daily.	That Council note the submitter's feedback. The bridges you outline are examples of why Council is planning and seeking additional funding this LTP. The budget obtained will influence the order of which bridges are prioritised and replaced.

Peter McLeish	1	Privately paid for a culvert on Kennedy Road and now unable to use because the bridge on McLeish Road is closed	That Council note the submitter's feedback. The bridges you outline is an example of why Council is planning and seeking additional funding this LTP. The budget obtained will influence the order of which bridges are prioritised and replaced.
Margaret McKelvie		Read that a bridge was built in Northern Southland that does not align with the road. Requests to know who pays for these mistakes?	That Council note the submitter's feedback. All associated costs with the realignment of this bridge sits with the construction contractor (no burden to Council/ratepayers).
Colin Smith	1	Believes that number 4 bridge at Dipton should be two lanes and re-aligned.	That Council note the submitter's feedback. A lot of analysis has been carried out to review options including the number of lanes and alignment on this structure and associated cost, benefits and risks. This information was supplied to Council so an informed decision could be made.

Attachment 3

Issues and Options Paper – Impact on rates

Background

Council needs to decide after considering all of the information available, including the options and the community views what the rates increases will be for the Long Term Plan 2021-2031 (LTP). There were 3 options proposed for year one of the LTP that Council has sought feedback on through key issue 3 of the consultation document:

- Option 1 – 16.54%
- Option 2 – 10.15% (Council's preferred option) or
- Option 3 – 7.95%

As highlighted in the submission process, this is the average total rate increase. The actual impact for any ratepayer depends on multiple factors including where they live, the services they receive and the value of their properties.

In our last LTP we said that we needed to gather better information about our services and assets to understand the scale of the challenges ahead. Now we need to be up front about what we have learnt about the state of our roads, bridges, community facilities, the work we do for our communities, where we are now, what we are facing, and what needs to happen.

Change is happening very quickly at national and international level. We are facing major legislative change, and a growing demand to better look after our resources, to ensure our native bush and significant landscapes are protected, and to manage climate change impacts. Doing this work comes at an additional cost.

Trying to do more with less has got us to where we are now as the wave of work and costs keep increasing. We have made some cuts to our corporate budgets to reduce costs, but the reality is that the level of investment needed to maintain and replace our current aging infrastructure will be impossible to find without increasing rates substantially. Funding long term from reserves is not a sustainable option – first, because we've used a lot of these funds already and, second, because it compounds the problem without providing a long-term solution.

What are rates?

Councils raise most of their funding through rates, investments, fees and charges to pay for the council activities and services. Central government also provides some funding or subsidies towards particular activities, mainly roading.

Property owners in the Southland District pay rates annually for services and activities provided by Council. Council also charges fees for specific services that individuals use, such as building inspections, resource consent applications, burials and dog licensing.

Rates are based on factors such as the properties capital value and land use. Some rates are targeted and in some cases receive a rates remission or are non-rateable.

There are different types of rates including:

- **General rates** – where the community as a whole meets costs of a particular function or functions. These taxes are rated on property value, according to a 'cents in the dollar' formula set annually by the council. The amount ratepayers pay varies according to their property value. Each council decides if the rates will be assessed on the land value, the capital value or the annual value of the property.
- **Targeted rates** – these are designed to fund a function or group of functions. Factors which can be used for calculating targeted rates are– land value, improvement value, capital value, annual value, total land area, area of land paved, sealed or built on, area of land protected, area of floor space of buildings, number of connections, number of water closets and urinals, number of separately used/inhabited parts, and extent of provision of services.
- **Differential rates** – general rates can be set on a differential basis, where the council can take into account property value, location, area, use, and activities allowed for under the Resource Management Act.
- **Uniform annual general charges** – these are fixed charges applied to every rating unit, no matter the value of the property.

Where any targeted rate is calculated as a fixed amount per rating unit, a council cannot collect more than 30% of its total rates revenue by way of a combination of those targeted rates and the uniform annual general charges.

The actual change in the rates you pay each year depends on the type of property you own, its value, and what Council services you use (for example, whether you are connected to our wastewater system).

What's contributing to the increase this LTP?

- The need to replace a large amount of infrastructure (replacements all due at the same time)
- Inflation (costs more to do the same work)
- Central Government legislative requirements (increase regulations and requirements)
- The reduction in the use of reserves for the 16.54% rate option (we used some reserves last year to offset the financial impacts of Covid-19 but most reserves can only be used to fund the activity they were collected for.) Once those reserves have been used up, our only alternatives to fund activities are from rates or loans.

Consultation document

The consultation document explained that to meet the cost of maintaining current levels of service, and meet our legislative and compliance requirements, Council should be rating 16.54% to provide a sustainable level of funding for the work we need to do. However, we understand that this is not a palatable option. In an effort to ease the cost of rates to everyone we have looked hard at our budgets, and made a number of financial adjustments (below) to arrive at a figure of 10.15% (our preferred option). These include:

- continuing to use reserves ($2.2 million)
- seeking a higher return on Council's reserves by proposing to invest our reserves in managed funds and borrow at a lower rate from the Local Government Funding Agency (LGFA), a greater

portion of which will offset rates ($250,000 of interest on reserves will be diverted to help fund our works programme)
- delaying fully funding depreciation for water and wastewater until 2028/2029 ($154,000)
- reducing expenditure on our stormwater infrastructure ($600,000)
- increasing our debt levels to meet any capital funding shortfall from not funding depreciation as expected

In the consultation document, Council provided three options for consideration within the consultation document that relate to the proposed rates increase:

Option 1 - 16.54% increase

Provides a sustainable level of funding for the work we need to do. We would maintain current levels of service, be able to complete maintenance and assessment of stormwater networks, and we'd have $2.45 million of reserves available for future use.

Option 2 - 10.15% increase (Council's preferred option)

We would maintain current levels of service, but we'd delay an assessment of our stormwater network, and would have $2.45 million less available in reserves.

Option 3 - 7.95% increase

We would have $1 million less per year for road maintenance, and less money for maintenance and assessment of stormwater networks. We would also delay some of the required biodiversity work.

Likely consequences on rates, on debt and on levels of service

The key issues identified for potential rate increases includes what the consequences are for each option

Option 1: 16.54% rates increase

Likely consequences on rates: Council would remove the changes indicated previously, resulting in 16.54% rates increase instead of the preferred option of 10.15%. Over the rest of the 10-year plan rates will range between 2.26% and 7.46%, with the peak in 2022/2023.

Likely consequences on debt: Debt would reduce by $154,000 due to Council rate funding depreciation for capital expenditure renewals. This option will see debt reduce over the next six years by between $96,756 and $508,208. Depreciation will be fully funded from 2028/2029 onwards.

Likely consequences on levels of service: No significant change to Council's level of service. However, additional funds will be available for stormwater condition assessment and maintenance projects ($600,000 in 2021/2022, $280,000 in 2022/2023 and $90,000 in 2023/2024). An additional $2.45 million of reserves would also be available for future use.

Option 2: 10.15% rates increase

Likely consequences on rates: 10.15% rates increase. The preferred options from issue 1 (roads) and issue 2 (bridges) are incorporated into this rate increase. Over the rest of the 10-year plan rates increases will range between 2.47% to 10.18% with the peak in 2022/2023.

Likely consequences on debt: Debt would increase by $154,000 due to the loan funding of the depreciation for capital expenditure renewals. Over the next six years of the plan there will be an increase in debt, ranging from $96,756 to $508,208. Depreciation will be fully funded from 2028/2029 onwards.

Likely consequences on levels of service: No significant change to Council's level of service. However, there will be a reduction in stormwater condition assessment and maintenance projects ($600,000 in 2021/2022, $280,000 in 2022/2023 and $90,000 in 2023/2024). Under this option $2.45 million of reserves would also not be available for future use.

Option 3: 7.95% Rates Increase

Likely consequences on rates: Overall the rate increase will be 7.95%. Over the rest of the 10-year plan rates will range between 2.47% and 11.58% with the peak in 2022/2023.

Likely consequences on debt: No change in the ten-year plan.

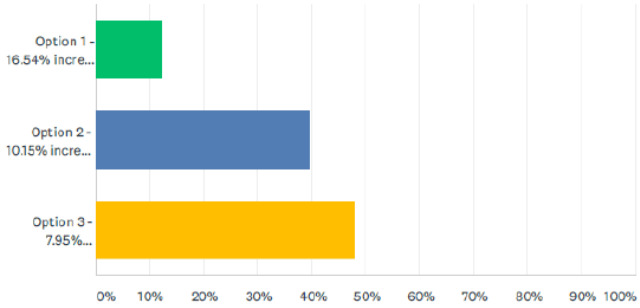
Likely consequences on levels of service: There will be a number of changes to Council's level of service required. Stormwater condition assessment and maintenance projects will be reduced resulting in savings ($760,000 in 2021/2022, $280,000 in 2022/2023 and $90,000 in 2023/2024). There will be reduced road maintenance of $1 million in 2021/2022 only. $450,000 will be removed from the biodiversity programme annually between 2021/2022 and 2024/2025. Full resourcing will occur the following year, one year later than originally planned. As in Option 2, $2.45 million of reserves would not be available for future use.

For options 1 and 2 there will be no significant change to the levels of service provided.

Summary of Feedback

Q5 Key issue - Rates We need to increase rates to maintain current levels of service. We prefer option two, which do you prefer?

Answered: 179 Skipped: 81



ANSWER CHOICES	RESPONSES	
Option 1 - 16.54% increase Provides a sustainable level of funding for the work we need to do. We'd maintain current levels of service, be able to complete maintenance and assessment of stormwater networks, and we'd have $2.45 million of reserves available for future use.	12.29%	22
Option 2 - 10.15% increase (our preferred option)We'd maintain current levels of service, but we'd delay an assessment of our stormwater network, and would have $2.45 million less available in reserves.	39.66%	71
Option 3 - 7.95% increaseWe'd have $1 million less per year for road maintenance, and less money for maintenance and assessment of stormwater networks. We may also have to delay any required biodiversity work.	48.04%	86
TOTAL		179

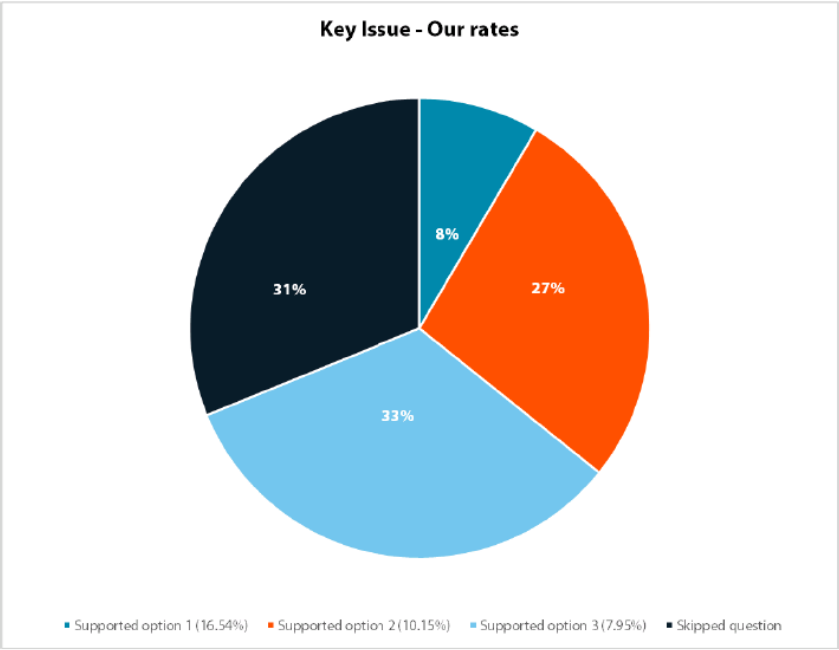
179 submitters answered this question. 81 skipped the question. There were 157 comments relating to this question.

52% of submitters who responded to the key issue on rates supported Options 1 (12%) or 2 (40%) to maintain current levels of service in accordance with those two options.

48% of submitters who responded supported the lower rate as outlined in Option 3. It is important to note that the majority of submitters who responded to Option 3 preferred no rate increase or a significantly lower rate increase then was provided by the options in the consultation document.

It should be noted that over 30% of submitters chose not to answer the question.

There were several themes in the written comments, including no rates increases, increases should be in line with inflation, increases should be delayed due to the impact of Covid-19, increases are not affordable, Council needs to be more efficient, Council needs to prioritise work and focus on core services. Comments also supported rate increases but were concerned about the affordability for lower income earners.



Issues

Affordability

Council received a number of submitter comments that related to affordability including the financial impact of the Covid-19 pandemic and the ability of people on fixed incomes to pay rates.

Southland District Council has a relatively small population which makes the rates burden higher depending on what council services are received. Challenges facing Council include the cost of replacing ageing infrastructure and meeting higher environmental standards.

Council recently completed a rates affordability analysis as part of the LTP process. Its purpose was to provide a baseline picture of rates affordability for households and businesses across Southland District in 2019/2020.

This analysis was be used by Council when reviewing the impact of its funding and rating decisions as part of the Revenue and Financing Policy and also in the review of the Rates Remission and Postponement Policy and development of the 2021 Long Term Plan.

The report provided a high level overview of the methods which Council could use to address any aggregate and distributional rates affordability issues.

The rates affordability assessment report states that affordability is defined as the ability to pay and individual households can be impacted on but not limited to a number of factors including:

- the level of disposable household income (gross income less tax)
- housing costs (eg rent, mortgage payments, insurance and rates)
- household size and composition (eg number/age of dependents)
- essential living costs (eg electricity, food, clothing, transport, heating)
- household wealth (property, financial assets and other non-financial assets)
- nature of Council services that the property receives/pays for and how rates for these are charged

It identified that while rates are affordable at the community (aggregate level) there are distributional rate affordability issues, particularly in urban areas with low income levels and a high proportion of fixed rates.

- at the household level, the issues are most evident in urban areas with low income levels and a high proportion of fixed rates (in particular service rates like water, sewerage, rubbish and recycling).
- Areas of Ohai, Nightcaps, Riverton, Otautau, Tuatapere, Wyndham, Lumsden all have median rates more than 5% of median household income and trigger multiple other affordability indicators.

This is reflected in the submissions with many highlighting that the proposed rate rises are unaffordable. However there is a level of support for the proposed rate rises as some want to continue to maintain levels of service in the District. The Remission and Postponement of Rates Policy can also be used to assist Council in considering the overall impact of any allocation of liability for revenue needs on the community that must be taken into account in developing the Revenue and Financing Policy. The Councils Remission and Postponement of Rates Policy specifies the circumstances where Council will consider remitting or postponing rates. A remission is where Council reduces the amount of rates to be paid and a postponement is where Council delays the payment of rates. Council has the inevitable task of trying to maximise and satisfy expectations whilst minimising costs. It must however do so in a manner that complies with its legal and moral responsibilities.

Covid-19 Financial impacts

Council received a number of comments in submissions that mentioned the financial impacts of Covid-19.

The Covid-19 pandemic has created a lot of change and economic uncertainty nationwide in the past year. In Southland district, Fiordland has been impacted most by the closure of New Zealand's borders as international tourists are its main source of income. This affects more than just tourism businesses – it has brought financial hardship to the Fiordland community. Domestic visitors have had a cushioning effect on other destinations such as Stewart Island/Rakiura and the Catlins.

The Southland economy has survived relatively well because of its base of food production. This should continue as long as international exports continue and we're able to receive imported components such as

pipes for our own capital works. Given that much of this plan is about investing in infrastructure to maintain our services over the long term, that work still needs to progress despite Covid-19.

A number of submitters have highlighted the impact of Covid-19 and ongoing recovery from the pandemic. Central government have provided a number of support packages to assist businesses recovering from Covid-19 and also for people who have lost their job as a result of Covid-19. The financial impact of Covid-19 was been felt throughout the country but especially in areas that are heavily reliant on tourism.

Many of those impacted by Covid-19 feel that this is not the appropriate time to be increasing rates at the levels proposed.

Staff acknowledge the impact of the Covid-19 pandemic and note the challenge the Fiordland area in particular have had. It was a key reason why Council continued to offset rates by the use of reserves, resulting in the 10.15% rate increase rather than the 16.54% increase. The downside to this is that, as the use of reserves are to offset ongoing costs, it will increase the following years rates when the reserve funding is removed. Of the 16.54% increase this year, 7% would relate to the removal of reserve and loan funding used to provide Covid-19 relief in the current year.

As always, Councillors and staff will continue to work closely and lobby central government for additional funding for projects to potentially reduce the rates increases in future years of the LTP.

Given the effect of Covid-19 is not widespread, targeted rates relief could be a more appropriate strategy. Currently as part of the draft Remission and Postponement of Rates Policy, Council has included the ability to provide remission for significant extraordinary circumstances including pandemics. This requires Council to identify the event, the effect of the event, who the remission will apply to, what it will be and how it will be applied along with how the remission will be funded.

Prioritisation of Services

The task of building, operating and maintaining our infrastructure assets in an affordable and sustainable manner is becoming increasingly difficult due to significant infrastructure issues including infrastructure deficits, changing government priorities and legislation, climate change and resilience. Appropriate infrastructure strikes a balance between community expectations, the levels of service that Council provides, and the cost to do so.

The works programme is a mixture of projects related to current assets and projects identified by Community Boards to meet the needs of their communities. As part of developing this programme, Council, Community Boards and staff consider the timing and appropriateness of the works to be undertaken.

Organisational efficiencies

Submitters comments included a number of comments around finding organisational efficiencies to do things for less.

Local Government legislation requires that Council's must regularly review the cost-effectiveness of current arrangements for meeting the needs of communities within its district or region for good-quality local infrastructure, local public services, and performance of regulatory functions.

Staff across the organisation look to provide services in a safe and efficient manner. The current procurement policy adopted by Council on 10 March 2021 provides for the purchase of works and

services which follows both local and central government procurement guidelines to ensure the best value for our community. Council also utilises 'All of Government' contracts, which enable Council to access potentially discounted goods and services, these create an efficiency for staff procuring services or products. Council has an obligation to ensure any work completed is done so safely and within the procurement policy.

Staff have worked over the past three years to identify more fully the state and future of the district's infrastructure. Much of our bridges, roads, water and waste services have out lived their expected lives. Central government has implemented new regulation measures in many of our activities and this has impacted our ability to deliver services at a lower cost as significant work is required to meet compliance standards.

Like any organisation, staff work to find more efficient ways to deliver these services across our district. The use of consultants is sometimes necessary as there are specific skills and capability gaps within our organisation where a specialist is needed for a one-off project or independent assessments of matters.

It is a challenging environment with 11% of New Zealand's land mass but a small population and low number of ratepayers. Councillors and staff regularly lobby central government for additional funding for the District.

Potential considerations

The issues and context raised above outline some of the key themes submitters identified regarding the proposed rate increases outlined in the consultation document. In addition to what has already been included the draft Remission and Postponement of Rates Policy as outlined above, Council could also consider the following:

- Reducing the rates increase of the Council's preferred option by using part of option 3 such as deferring biodiversity work in year one
- To help address affordability concerns:
  - Council could consider reallocating part of the strategic asset reserve from roading where it is currently fully allocated to another area such as wastewater
  - Council could also move more of the general rate onto capital value than fixed charge
- Re-prioritisation of some work across the 10 year term of the LTP such as deferring some toilet upgrades or the construction of Council offices

There are advantages and disadvantages for all options but it is important to note that these and others are available to Council in addition to the proposed options outlined below as part of the deliberations process.

Options

In the consultation document, Council has provided three options for consideration within the consultation document that relate to the proposed rates increase. These are:

Option 1 - 16.54% increase

Provides a sustainable level of funding for the work we need to do. We'd maintain current levels of service, be able to complete maintenance and assessment of stormwater networks, and we'd have $2.45 million of reserves available for future use.

Option 2 - 10.15% increase (our preferred option)

We'd maintain current levels of service, but we'd delay an assessment of our stormwater network, and would have $2.45 million less available in reserves.

Option 3 - 7.95% increase

We'd have $1 million less per year for road maintenance, and less money for maintenance and assessment of stormwater networks. We may also have to delay any required biodiversity work.

Option 1 – Approve a 16.54% average rates increase

Advantages	*Disadvantages*
• No significant change to Council's level of service • $2.45 million of reserves would also be available for future use • additional funds will be available for stormwater condition assessment and maintenance projects • No change to debt levels	• Highest cost to ratepayers • Increases affordability issues and covid-19 impact early in recovery

Option 2 – Approve a 10.15% average rates increase

Advantages	*Disadvantages*
• Lower cost to ratepayers without impacting on levels of service • Use of reserves to offset the impact of rates • Slightly reduces potential affordability issues compared to option 1	• Cost to ratepayers • A reduction in stormwater condition assessment and maintenance projects • Debt would increase by $154,000 due to Council rate funding depreciation for capital expenditure renewals. • $2.45 million of reserves would also not be available for future use.

Option 3 – Approve a 7.95% average rates

Advantages	*Disadvantages*
• Further reduction in cost to ratepayers • Use of reserves to offset the impact of rates • Slightly reduces potential affordability issues compared to options 1 and 2	• Stormwater condition assessment and maintenance would be further reduced • Less funding available for general road maintenance • Further delays to biodiversity programme • $2.45 million of reserves would not be available for future use.

	• Potentially increases risk of unbudgeted expenditure (extra costs) that may eventuate

Discussion/Analysis

The proposed rates increases are a result of the direction provided by the Infrastructure and Financial Strategies, the proposed delivery of services outlined across the Activity Management Plans and associated budgets. The purpose of providing rates as a key issue for the consultation was to highlight the significant challenges facing Council to deliver the services to our communities.

Out of the 260 total submissions, 179 submitters answered this question and 81 skipped the question.

Out of the 179 submitters who answered the key issue on rates, 52 supported Options 1 (12%) or 2 (40%) to maintain current levels of service in accordance with those two options. This shows there is a level of support for Council to continue to provide the level service. However, it is noted that for many this results increases above the average rate increase of 10.15%, a level of concern for those not in a position to afford the rate increase and increased expectation for Council to deliver on what it is proposing.

Out of the 179 submitters who answered the key issue on rates, 48% of submitters who responded supported the lower rate as outlined in Option 3. This statistic is somewhat misleading and it is important to note that the majority of submitters who responded to Option 3 preferred no rate increase or a significantly lower rate increase then was provided by the options in the consultation document. The issues outlined above reflect those outlined by submitters.

It should also be noted that over 30% of submitters chose not to answer the questions.

Recommendation

That the Council:

a) **Confirms in relation to issue 3, the impact on rates for 2021/2022, that Council's preferred option (a 10.15% rates increase) remains the preferred option.**

Excerpts of feedback on 'Impact on rates'

Due to the nature of the comments of the in the summary table below, staff have tried to group the comments into key themes and provide responses to those themes as shown below.

Name	Submission summary	Staff recommendation
Rates Increase – no increase		
Diane Gibson	No increase at all. I'd like you to tell me what exactly I get for my rates as currently I don't see anything!! Not even rubbish collection!!! Please enlighten me!!	Staff have worked over the past three years to improve the state and future of the district's infrastructure. To hold rates in the past, Council has stretched the lives of the assets as far as possible. To ensure that we are don't have a major failure that affects the health and safety of our residents we need to increase our infrastructure spend. Central government and the regional council have implemented new regulation measures in many of our activities and this has impacted our ability to deliver services at a lower cost as significant work is required to meet compliance standards.
Renee Crickett	None of the above. Why is the infrastructure run down to a state that we need a 10% increase to maintain our current level of service? This seems ridiculous.	
Ben Traill	No rates increase at all. Meridian and govt are killing our river, if we allow this to continue then they can stump up for whatever you need more money for. Terrible stuff guys, has there been an independent review into your spending?	
Laura	Strongly oppose rates increase	
Stephanie Jonea	I would prefer a far lesser increase than you're asking across the board but that's not an option it would seem	
Abby	Put a hold on rates increase look at what we pay compared to other regions. No confidence at all in the SDC. So out of touch	
Mary Napper	The proposed level of increase is horrendous. The examples used in the consultation document are helpful to understand how this may affect readers however it is a pity that the Ohai and Nightcaps communities have not had the opportunity to talk to anyone about this unless they travel to Otautau or further afield.	
Jared Gorrie	I would like to support a 0% increase, this isn't much of a choice....	
Wendy Joy Baker	The current levels of service are not good. To be honest there should be no rate increase! As far as I am concerned the Council is not doing a good/efficient job in areas of Animal control (dog control) or applying code of conduct rules to Council representatives like the Mayor!	
Asha Carr	No rate increase	
Natalie Carran	I don't like any of the above options they are unfeasible. Due to the increased costs of road and bridge repairs/replacements, is	

	SDC's wage increase be less for the next 5 years as opposed to past years? E.g. will it be between 1-2% like SDHB's nurses pay rises? I see people everyday that can't afford to feed their children, pay for them to go to the doctor or live basically and now thins is put upon them. It is not fair or acceptable. At what point does the SDC stand up for the ratepayers against the government and say "NO", and ask for more funding. Food parcels, these are a weekly thing getting handed out to families in western southland communities, how do you think rates increases will affect these.	
Douglas Agnew	The current level is satisfactory however if it is to rise then I suggest you do something about speeding through our town. Speed cameras or signs to slow drivers down. I am not in favour of a huge rates rise as suggested by your Long Term Plan. If this rate rise is to go ahead I would be strongly in favour of a rates boycott.	
Rates Increase – increase with inflation		
Emma Peterson	No option to increase at a level that is in line with pay increases around 2%. No increase is preferable but an increase that well exceeds that of the average pay increase is not realistic.	Rates increases have historically not aligned with the Consumer Price Index, which people often use to measure inflation. The CPI (Consumer Price Index) measures a basket of goods for households rather than the costs specific to services council provides the community. The Productivity Commission noted in its report to Government in December 2019 that excluding depreciation and interest, local government operational expenditure per person grew at an average of 1.2% per year between 2007 and 2017 after adjusting for inflation using the commissions preferred price index. It also noted that regional and rural council operating expenditure per person grew faster than metro and provincial council operating expenditure (pg. 41 of the Local Govt funding and financing report). In metro and provincial councils, growth in the communities had offset cost increases The LTP uses BERL rates of inflation for key activities and costs. BERL is an independent organisation that specialises in future cost estimation based on past trends and current factors. It has provided Councils around New Zealand with inflation factors for use in its Long Term Planning process for many years, in order for Council to meet its statutory obligations. Part of the BERL inflationary increases is an estimate of staff cost increases. The actual staff increase in any year is
Wayne Muntz	1.4% is the CPI what's wrong with 1.4 !!!!!!!!	
Euan Templeton	What about an option much closer to the rate of inflation? Even 8% cumulative over as period of years in unsustainable	
Chris and Viv Shaw	None of these options are appropriate. As has been already stated, this part is the consultation process is deeply flawed. We do not support any of the options proposed, as these are not the only options available. Council is attempting to produce favourable statistics from its limited range of options With Covid-19, some parts of the economy in Southland are recovering well; and other parts, in areas such as Te Anau, may well get much worse for possibly years before there is any improvement. This makes the timing of the proposed rates increases, which are well above inflation, unacceptable. It also makes the roading model at the heart of rating decisions effectively out-of-date. The rates increase should at worst be in line with inflation, or at best below the rate of inflation. Councillors and staff should be constantly looking for ways of delivering services in the most efficient way possible. The new Chief Executive should use his analytical skills, in conjunction with other staff, to review the whole operation and get the best value for money possible.	

Travis Naylor	Neither option is acceptable. Council can't expect to increase rates by double digits, they should be limited to CPI increases. This council needs to understand a rates increase of this magnitude is unacceptable. Council needs to learn to live within their income stream. Council needs to get more bang for our buck. Rates are only paid by landowners not all the people using the services. With such a large DOC estate in the Southland district a law change to get DOC to pay their fair share needs to happen. This council needs to get more value for money when doing any work.	based on performance and the position value in the market, taken from information supplied from independent employment agencies. As well as inflation, the rising costs from regulatory changes, climate change, and the increased investment in infrastructure have added to the overall increase.
Noel and Margaret Curtin	Rates - our rates will increase by Option 1 - $374.97, Option 2 - $252.19, Option 3 - $197.50 None of these increases have any relation to inflation. Council should take into consideration that its ratepayers have to budget within their income whether they are large dairy farmers or fixed income superannuants. So, council look to how ratepayers one of your major sources of income/budget their income.	
Christine Ellen Henderson	Inflation indexed costs are the usual basis for future funding. Is the present and projected rate of inflation being taken into account for these projects? The community projects planned for in this document seem to be in need of local feedback as to cost an appropriateness - i.e. playgrounds and footpaths. There is a need to consult with local children between the age of 8-16 as to the setup and amenities they would like - which don't need to be expensive and locals can assist with payment in kind.	
R L Pearson	Neither - rate increase should not exceed the rate of inflation - if we can't afford it we go without. Employed specialists e.g. engineers need to do your work without having to employ consultants. Too much money is wasted on more changes, logo change, consultants and fancy titles.	
Andre Bekhuis	Rates should be adjusted in line with inflation and not in one heart stopping jolt. Hire staff who can do their jobs rather than employing consultants to do it for them.	
Nigel Humphries	None of these options. How about trying to actually not increase rates at all. Many business have actually had to take income cuts and look at all expenditure. Inflation is running at an all time low so no increase is justified no matter how much it is promoted. Why is a 2% increase not an option. Look at where the extra $ is being spent. Like many of us, why not actually borrow a bit more or use some reserves like we have had to do to get through this difficult time. This debt can be paid back long term. Look beyond the 10 years.	

Edward Charlton	Current New Zealand inflation rate is 2.15%, rates can only be justified to rise at that level and no higher. Reduce the staff levels by removing 50% there who are simply bureaucrats with no true value but still on hefty salaries, then no need to "invest more" as the funds will be freed up. Obviously, the Chief Executive is incompetent if required is a sudden boost of funds (rates increase). All performance reviews need to be made public.	
Russell MacPherson	No increase in rates above inflation rate. Rates increases have been above inflation for many years what have you been doing with the money!!! Council needs to look at in-house roading and bridge maintenance options to improve services and accountability.	
Chantel Marshall	Where is the option 4 - inflation of 2.15% only? Need independent data analysis of budget to explain expenditure. Council just put an increase on standard costs. Why are mowing costs continually rising in such astronomical amounts? What is the actual cost of last year? As a district we rely on you to spend the money wisely and in tough times, concentrate on how to get the biggest value for money. To have comments like "sometimes rates just aren't fair" from the CFO is disgusting. Fight with the higher powers for more funding for Southland. We could be self-sufficient if we didn't have to give all our road taxes to central government and then receive only a portion back. Look harder internally. Restructure and make SDC a well-oiled machine. Right now, it is a shamble and the public have no trust or respect for what you are doing. To have a glossy colour printed LTP document like the one you produced with minimal information is an example of wasting money. Especially as many in the community never received one. I wonder how many are still sitting in your storage rooms.	
Robyn Rogers	I really feel that all the options present too great a rates increase for this year. Wage earners and beneficiaries do not get a 7-16% increase in income, and have to manage their expenditure to fit with their income. Public bodies seem to have a licence to just keep asking for more money. So maybe a 2-3% increase would be more realistic for ratepayers, and trim council expenditure.	
Peter Gutsell	Rates should always reflect inflation rate	
Andy and Pam Booth	This is still above inflation. Many families cannot afford this	
Bryan Barnes	What are our rates being used for? Rates increases to be based on current inflation increase. How many employees of SDC are earning excess of $100,000?	

Rates Increase – No increase due to Covid-19		
Katherine Morrow	I prefer none of the above, how would our rates be going up 10.15% for the same level of maintenance etc. Covid-19 has been a big hit and yet the plan is to put our rates up? we pay very high rates as it is how is this beneficial for your residents?	Staff acknowledge the impact of the Covid-19 pandemic and note the challenge the Fiordland area in particular had from an economic perspective. For the 2020/2021 financial year, Council provided relief across the district through funding from reserves to reduce the rates impact, as part of the LTP Council has continued to offset rates by the use of reserves, resulting in the 10.15% increase rather than the 16.54% increase. However, as the use of reserves are to offset ongoing costs, all it does is increase the following years rates increase when the reserve funding is removed. Of the 16.54% increase this year, 7% relates to the removal of reserve and loan funding as part of Covid-19 relief outlined above. Councillors and staff will continue to work closely and lobby central government for additional funding for projects to potentially reduce the future years of the LTP. It should be noted that some areas of Southland are not affected from the effects of Covid-19 and are performing well economically, so rather than a lowering the rate increase for everyone, targeted rates relief could be a more appropriate strategy. As part of the Remission and Postponement of Rates Policy, Council has included in the draft policy the ability to provide remission for significant extraordinary circumstances including pandemics.
Wendy den Hertog	Covid has affected Te Anau residents more than any other Southland town. We are struggling to pay our bills and are reliant on subsidies. We cannot afford any increase. I would choose option 4 – No increase to rates, but that wasn't an option.	
Shona McCorkindale	Good grief.... businesses are already struggling with the effects of covid and the down turn in tourism and now you decide to up our rates.... kick us while we are down...where do you think the extra revenue is going to come from for businesses to pay this.. Hold off on major rate increases until our area is in a much better financial footing. Any rate increase for this next year should be less than 5% which is still a lot of extra money that businesses will have to find. Start thinking of your rate payers...we are not an endless pit of money!	
Stuart Fowler	Why should we increase the rate when we are cruising at the moment and middle of a pandemic with people losing their jobs money being short and we don't know how long it's going to last. But yet the government departments think it's okay to make it harder for the people get out of the office and have a look around talk to the ones in the workforce they will tell you. Where is your duty of care in all this? Money should be spent in places where we need to, likes of corners with poor visibility, broom and gorse that need sprayed in townships and road potholes that need fixed. Not on lawyer fees for around the mountain bike trail. Unnecessary vehicle use.	
Ev Morrison	Given the current Covid-19 related financial changes/job losses/ and stress/mental issues that people are experiencing a large increase in the rates is not acceptable.	
Glyn Saunders	We are coming out of a pandemic of which the full economic impact is yet to be realised. Sometimes these things need to wait until the community can actually afford them. I get the desire to provide a high standard of infrastructure but for me, it is not a life-changer. Our land has no town water/sewer/stormwater or rubbish services, nor do we need them.	
Michelle Grant	Actually, I would choose option D which is no rates increase for this year. Living in Te Anau so many people have been affected by covid this year and people are really struggling, my income has reduced by 40% and I have some friends that have had to leave.	

	My partner would be the same as we both work in tourism. Council needs to look at efficiencies. I also feel I'm paying for services I don't receive. I think have a look at what is priority and leave some of the rest until next year until people may be in a more financial position to afford an increase.	
Judi Ferris	Considering the state our town and surrounding area is in financially at the present time and next 6 months surely, it's more realistic rise of 2 to 2.5% in our rates would put a lot less strain on the local people. My husband and I have become a one income family due to Covid and are struggling to cover our living expenses. There are a lot worse off than us out there who would appreciate a little consideration due to the situation Covid has dropped us in	
Karissa Chalmers	How can you expect people to be able to afford this rates increase when many areas in southland have been so greatly impacted by Covid?? Te Anau has no tourists, people are struggling with not having full time work	
Hannah	I agree these are important projects - however I think it should be delayed a year due to Covid circumstances	
Lisa	Too much for New Zealanders! Especially in the current climate. I really feel SDC isn't about the people at all.	
Tina Hardie	I'm from Te Anau and I don't think it's a great time to be asking for big increases... it's just really hard on people at the moment.	
Rebecca	To increase by 10.15% is not appropriate at this time for a township like Te Anau that is suffering hugely thanks to Covid. It shows a lack of foresight from SDC that suitable increments have not be made in the past (the need to replace bridges is not a surprise). It also shows a lack of understanding of what is going on amongst communities that are hurting - critically in some situations. In fact, 7.95% is also too high but there was no option 4.	
Brian Johnston	The last 12 months or so has been very tough for many. Small towns like Manapouri & Te Anau have been especially hit hard. Many have lost their job or are facing financial hardship. To suggest a rates increase of over 10% not only seems insensitive but a financial kick in the guts for many of us. I note in your LTP document that the burden of the proposed increases falls on Residential Rate payers. Why not propose a more equitable division of burden by placing a higher rates increase on the regions farming community who are only expected to pay from between 6% to 9% of TOTAL RATES in 2021/22? Also I note from the document that between 2021 and 2025 the Fiordland	

	Community Board intends to spend a huge amount of rate payers money on "harbour beautification" and on Te Anau Airport Manapouri runway which I am totally opposed to.	
Roderick Hall-Jones	Even this is too much, people out there are hurting!	
Ali Wilson	You have got to be kidding a rates increase. I've ticked the last one, but I cannot afford rates now! Some of us have had lots of change in 2020, leave our rates alone.	
Eve Thomas	I think after Covid has had a major effect on our small community a lot of people can't afford this increase at the moment	
Phillip Leven	Submitter selected all three options. I don't know what planet some of you people are from, to want to increase rates in the economic climate is madness, get rid of some of the bureaucrats sitting in council offices trying to justify their jobs at rates payers expensive	
Karyn Abercrombie	I prefer that the council look to make savings and not increase the rates at all. This year has been hard enough with Covid without the council piling on more debt to ratepayers. I notice you don't give the zero rate increase as an option to select in your survey.	
Ben Killeen	2021 is going to be a very challenging year for Northern Southland. A break in rates will ease pain slightly. Could be recalculated in 2022	
Timothy Francis	Your preferred option of a supposedly 10.15% increase is ridiculous and unaffordable for those of us on a low income. The actual predicted increase of $452.55 on my existing rates of $2532 p/a is actually a 17.8% increase. Given current economic conditions and the fallout from the Covid-19 Pandemic it is the wrong time to be considering ANY increase to rates, particularly in lower socio-economic small towns and villages. Cut back council spending in other areas instead.	
Chamber of Commerce	There is an even split opinion between Option 1 (16.54% increase), Option 2 (10.15% increase and Option 3 (7.95% increase) of our members who responded to the survey however, it is felt that this is not the time for significant rates increases, especially for the Fiordland region.	
Matt Ammunson-Fyall (Tourism NZ)	The importance of the Southland District to tourism in New Zealand cannot be over-stated, hosting important tourism destinations such as Te Anau, Rakiura Stewart Island and Piopiotahi Milford Sound. We acknowledge the significant infrastructure challenges however we are concerned at the proposed rate increases. There remains significant uncertainty in	

	the tourism industry and a full recovery may take 5 years or longer. The challenges faced by local councils re funding decisions are nationwide. We have proposed a Regional Tourism Fund to central govt aligning with other regional funds. We would work with SDC and other local authorities to seek the introduction of this fund as soon as possible.	
Georgia	You need to find other ways to get funds rather than a huge rates hike. A lot of families are doing it tough and especially so with Covid. Maybe cut your own wages as a lot of us are unemployed.	
Rates Increase – Increase less then option 3, be more efficient		
Jan Popham	Your document provides little justification for any substantial rates increase as proposed. I suggest 2% and fund infrastructure from Council efficiencies or government funding. Do the basics and support the ratepayers and make it easier for people to understand what is planned.	Staff across the organisation look to provide services in a safe and efficient manner. The current procurement policy adopted by Council on 10 March 2021 provides for the purchase of works and services which follows both local and central government procurement guidelines to ensure the best value for our community. Council also utilises all of Government contracts, which enable Council to access potentially discounted goods and services, these create an efficiency for staff procuring services or products. Council has an obligation to ensure any work completed is done so safely and within the procurement policy. Staff have worked over the past three years to identify more fully the state and future of the district's infrastructure. Much of our bridges, roads, water and waste services have out lived their expected lives. Central government has implemented new regulation measures in many of our activities and this has impacted our ability to deliver services at a lower cost as significant work is required to meet compliance standards. Like any organisation, staff work to find more efficient ways to deliver these services across our district. The use of consultants is sometimes necessary as there are specific skills and capability gaps within our organisation where a specialist is needed for a one-off project or independent assessments of matters. It is a challenging environment with 11% of New Zealand's land mass but a small population and low number of ratepayers. Councillors and staff regularly lobby central government for additional funding for the District.
Sonya and Ian Crook	Better maintenance would result in less costs for repairs. Council efficiencies such as staffing rates and productivity, trim costs in each area, be creative to find cost reductions, get rid of non-essentials (eg magazine), focus on infrastructure and less on cultural needs, be pragmatic and apply value for money decision making, contractor accountability before payment through sign off protocols	
John Bruce	Come on...live within our means. Have a good look at the management to see where costs can be saved. Cut down Council members or amalgamate locally get rid of those who are full of wind and are only involved for their own self interests.	
Brendan	Neither, look at your costs, toilets in te anau, cleaned and run by a contractor. Waste of money manning a building not being used. Start small and think big, we all don't get fat salaries like those in council jobs. I'm sure cuts could be made, think it time the ratepayers start being heard, instead of the old deaf ears in times gone by.	
Jody R Muntz	No increase, we are being ripped off now! Staffing cuts to save money. Start cutting the bureaucratic red tape and look for internal ways to save money, remembering it's our money and taxes your using to pay your wages, we deserve valve for money. Time to cut the fat.	
Shirley Cranstoun	Stop spending $33k on extravagant end of year work functions. Stop paying councillors from out of town to stay at lavish hotels overnight. Skype your meetings. Close down the Otautau, Riverton and Winton offices and all centralise at the Invercargill Office. You should send out a rates rebate application to all	

	ratepayers with their rates notices. Penalising people who are trying to make ends meet is mean spirited in view of the fact that Mayor Tong gladly took his 6% pay rise.	
Ivan Dale	Its a sham that our infrastructure has been allowed to deteriorate to such an extent - "penny pinching" in previous years has come back to bite you in the arse big time. We haven't got the ratepayer base to let it get bad - then fix	
CR and JL McCrostie	Live within your means like the rest of us have to. Large rate increases year on year are not affordable. Council should live within its means and stop wasting money. Council's administration costs need to be reviewed and decreased.	
Richard Xhemali Kulla	Option 3, However, I would like to see someone employed who can go through contracts and billing, find the money you want from there. In the spirit of the team of 5 million who have had to tighten our purses, the council should see what they can save over the next three years. Where they could spend money more cost effectively. New vehicles on hold. Perhaps an examination of the bidding and guarantee's given by roading contractors. Perhaps in hard times they could stop scalping us all for their shoddy work. We can do better than passing on rates increases every time, you can't go to an employer and go, my budgets increased I need more money. Any rates increase is inappropriate due to Covid19 - give people 3 years to get back on their feet, especially those in the tourism industry. How will Council make this proposed increase fairer to people with disabilities or mental health problems? – a rate rebate adjustment would be preferred if you increase rates as suggested	
Le-Anne (Lee) Murray	I'm behind the wording in option 1 but not the rate increase. Hence, I have ticked "7.95% increase". On page 23 of the consultation document it states "proposed rates increases 2021-2031" It shows the rate increase being 10.15% although on the same graph it states in orange that the "2021 LTP - Rates (%) Increase Limit" is 8%. Therefore, the maximum increase to rates should be 8%, why are they higher and in some cases double this. Re-look at the budget and find ways to reduce running costs/expenditure, sell off any unnecessary assets, pay freeze, reduce salary hours to 90% whilst maintaining current levels of service. Many businesses are successfully doing this. Work smarter not harder. Work out what projects are urgent/non-negotiable and what projects can be put on hold or modified to reduce costs yet still execute the project.	

	From my understanding LTP's are done every 3 years. Therefore did the last long term plan foresee a rate increase to be this large for the period 21/22 and 22/23?	
Ray and Emily Matthews	You should learn to live with in your budget like the rest of us.	
Diane Fretter	Here in Otautau it is more than 10% than our rates are going to rise according to the summary document. And along with this larger than average rise, the projects for the Wallace Takitimu Community Board seem to be fewer in both number and value than other areas which are seeing a rates increase which is lower than ours. Perhaps Council could look at cutting costs in other areas - a combination raising rates to increase revenue while cutting costs in some less critical areas. We have experienced zoom type meetings, so rather than seeing several SDC vehicles outside the building on a community board night, some meeting could be help with the paid SDC members "zooming" in from Invercargill. Better use could also be made of some of the existing council buildings.	
Scott	Maybe, instead of spending money on flash new tables, you could just keep using the old ones and stop leaching of people that are just trying to get by. Ask volunteers to do biodiversity work, or offer rates breaks to locals e.g. farmers, beneficiaries, to do the planting (maintenance). Then you could get the proposed long term rates value increase in labour, that is rumoured to end up almost doubling the already ridiculous rates.	
Shirley Mouat	None of the options are acceptable as these are unaffordable and will put more pressure financially on people. Council needs to stop this out of control expenditure and learn to live within its means like everyone else. AirBnB should be charged same rates as motels for fairness. SDC you have no value of money and should stop squandering it on unnecessary things. Stick to roading, water and wastewater	
Paul Evans	Look at current spending and make cuts to overheads causing overspending. Staff can give answers to simple questions and won't facilitate recycling in our town. Insufficient advice on matters for ratepayers but happy stop growth or any positive in our community.	
Darelle Jenkins – Hospitality NZ	Hospitality NZ requests caution around rates increases. Supports maintenance projects, but businesses can't afford the rate increase. Recommends Council seek extra revenue from elsewhere including reviewing number of staff required, or as imposing fees on STRA to start paying their fair share instead of	

	putting more pressure on over-burdened ratepayer. Hospitality NZ members are asking for some transparency in how the rates revenue is being spent. We would like a greater understanding on what checks and balances are placed on spend and how the results of the spend are reported. Communities are not receiving benefits of rate increase; local businesses are not seeing increase in revenue. Stronger analysis on Council return on investment (ROI) is needed on SDC's investments.	
Catherine Hill	Would like to see a comparison of yearly results of costs, income and comparisons over several years - capital costs and general expenses. Are staff invited to make submissions on ways to cut costs? Maybe SDC could employ time and motion consultants, could be money well spent.	
Diane and Noel Cournane	Forget about the flash cars the Council drives around in and do something constructive with our rate money.	
Bevan Webster	There must be cheaper ways of doing things. Other contractors' different companies etc.	
Rates Increase – Increase less then option 3, prioritise critical work		
Harry Ford	The amount of money getting spent on the Te Anau/Manapouri runway is a disgrace. That airport has been the biggest waste of ratepayers money, and yet now you want to spend another 1.5 million resurfacing it!!! Until the council starts to think about not wasting money on irrelevant things and then complaining about not enough money for roads and bridges. You won't get my backing for rates increases until the council starts to think!!!!	As part of the planning process, staff review the information it holds about its infrastructure to ensure that the work it undertakes in any year is the work that is needed. As part of this process, prioritisation of works occurs. As a collective, the community is represented by Councillors and Community Boards that have recommended levels of service across our vast district. Each settlement has different needs and sometimes it is easy to take points in isolation as to what one settlement has that another does not. Council, Community Boards and staff work to provide levels of service that reflect the differences of each community. The challenges to deliver local services cost-effectively are geographic distance, variety of environmental factors such as coastal versus alpine, small populations and rating bases. User pays systems come with administration costs. Staff work to partner where possible with other entities to reduce the rating impact and work has been prioritised across the LTP. Submissions received in relation to Community Board projects will also be forwarded to Boards for their information. Staff will clarify to the relevant submitters, that rates do not increase because of an increase in property values. Property values are used to distribute the total rates Council requires.
Katie Jones	My option is 0 increase, but this option is not being provided here. As outlined above. Stop spending money on nice to have things and focus on infrastructure. We are in the middle of our deepest economic crises and the endless borrowing money is irresponsible. Whoever planned the budget has lost touch with reality and is irresponsible	
Samantha Grant	I am concerned at the projected money going into Lumsden area for areas we have no connection to. You don't invest enough into our area into matters of urgency. For the last nine years we have had ongoing trouble with stormwater and mains water issues. Footpaths, especially Hero St should be high priority given our child was nearly hit by a police car one evening in the winter. We had no choice but to walk on the road because of a combination of low lighting and the muddy grass verges. There seem to be priorities to make things look nice versus need for crucial infrastructure. How about distribute the money we already dish out to where it matters.	

Peter Zessin	It would appear that storm water networks in various parts of the region have not been maintained adequately in the past anyway. Surely there are other areas where the SDC can reduce expenditure and not have to target reductions in biodiversity work. There shouldn't have to be a trade-off between environmental issues and roads. Do things smarter and make drastic cuts in other area's instead.	Overall there remains opportunity to communicate Councils rating system, plans and priorities through the multiple communications options available.
Douglas Agnew/Jenny and Tony Tippet	Your projected rate increases are not acceptable. Some services need to be reduced and, in some cases, removed completely. Council's incompetence over the last 10 years to factor in roading and bridges should not be a burden the rate payers have to bear. Who's going to pay? the Council not the Rate Payers. You talk about Covid-19 however your LTP Consultation Document however the rate increase you are proposing is not reflected in this and doesn't seem to be factored in.	
Christopher Halder	None of these options, we do not want an increase, we want the money to be better spent, and have people accountable for the actions of where the money has been spent.	
John Davey	If the council stuck to the basics and did not waste money on around the mountain cycle ways or Manapouri airport (resurfacing runway when there is no airline ever likely to use it) A reduction in bureaucracy, red tape and consultants might go a long way to saving money. Doing a job properly once instead of the cheapest tender would save money in the long run.	
Carole Elder	I only picked option 3 because I had to pick one but would prefer no rate increase. Council needs to think about where they are spending. Too much is wasted on non-important ideas. Maybe instead of spending millions on doing up your main offices and spending hundreds of thousands of dollars on new parks and upgrades to them. Money should be put towards more important areas. Especially now as rate payers are struggling and some of us just miss out on the handouts. With the year we have had we need some time to get back on top of all our debts before you start taking more money of us rate payers. I don't think current levels of service are that great anyway. Freedom campers out at Monkey Island and Colac Bay are not being monitored by SDC staff. Colac Bay is self-contained vehicles only. This is another cost to rate payers that isn't doing its job and do we really need it. Maybe if the Mayor, CEO, Councillor and higher ranked employees of SDC took a pay cut that would help out a lot. And would show their loyalties to their rate payers. I feel	

	council should look internally to find better ways to operate cheaper and save money.	
Gary McCorkindale	Just the stupid spending this council does like building a new toilet complex and remove the block beside the Mobil garage now putting another block free to use outside Paper plus when the status quo will upgrade of Lions park toilet	
S D Payne	5% max. The country has a 1 billion debit ratepayers cannot afford an increase in rates above last years increase, for government rules that have no chance of working without bankrupting the country i.e. stopping climate change and water rules. Do you not know NZ is going to have a double dip recession, At the moment government is trying to bankrupt the agriculture sector i.e. water rates that are not rationale, restrictions on what slope paddocks can be worked etc, no apple pickers 600 million dollars rotting on the ground.	
A D Wilson	Utilise correct rating and methods to fund these activities or reduce the levels of service. At some point Councils must stop taking funds just because they can. If there is no money then cost cutting will be the only way ratepayers can survive.	
R & A Johnston	I propose and submit only a 5.13% increase in rates, which is significant enough when you look at but affordable enough as a ratepayer in the Southland District compared to other South Island Councils and level of service reductions where necessary. Our roading network will reduce due to carbon contracts, local govt amalgamation required (e.g. 3 waters). Our assets per capita are high and are not managed appropriately. Trust and business confidence in Council is diminishing. Reduce playground equipment.	
Carla Brockman	I cannot believe that with the incredible increase of property values and with SDC's rating percentage tied to those values that the income generated for roading will decrease. Leave things be as they are for the meanwhile. We have all suffered one way or another with the effects of the Covid-19 Pandemic and this is not the time to increase SDC spending on roads. During these difficult times SDC should concentrate on the basics. Biodiversity can wait until we get our feet underneath us again. Put a hold on increasing top end salaries. Be frugal as you would wish your family would be. Spend money as if it were coming from your own pocket. Do not treat it as OPM (Other People's Money). This has been a brutal year, try to lessen the pain not	

	increase it. Please do not be fancy or create slick glossy pamphlets. Put a hold on re-branding. Stick to the basics.	
Wynn Avery	Property in Southland has risen in value by 14.7 per cent in the last year so there will be an automatic rate increase of more than 10 percent.	
Sandra Cooper	Rate payers should not be the sole source of funding - yes, we used the services so should contribute and some increase is necessary. Council should be asking why has it got to this stage and with government need a better plan. Overseas tourist/freedom campers don't pay for their impact on infrastructure Cruise ships cause massive environmental impact and need to be restricted to main port areas and taxed for maintenance. Ensure affordable camping options available to reduce stress on areas that have no money to provide facilities - make a tax. People claiming the benefit are able to work - use labour to maintain grounds/painting etc so money can be allocated elsewhere. Be a little more resourceful as rate payers cannot keep footing all the bills. Think outside the square and use other resources.	
John Barnett	At this point in time Councils need to look at their spending. Many new plans are being made where there is no benefit to help in holding rate increases. The Around the Mountains cycle trail provides very little income to a big majority of rate payers in Southland. The cost in maintaining all these new innovations is increasing each year. I have never seen the actual income generated by the cyclists which Councils receive. How do you equate the amount you get to maintain this venture? Has the Council thought of services such as accommodation, restaurants etc. advertising on the track and paying for their advertising. I would like the Council to look at the number of office workers they have. Each time the Govt. introduce a new legislation, Council appoints a new person responsible for the position. I am sure in many of these positions they could be managed by present staff.	
Shirley Paterson	Who is accountable for seeing level of services promised are carried out? Accountability? Where? Suggest council departments work with their budgets rather than overspend and pass it on as rates increases - rates increases cannot be sustained perhaps check funding models PGF etc. Councillors and council staff hopefully must be aware of ratepayers ongoing frustration at the annual rates increases. With many ratepayers being on fixed	

	incomes, lost jobs and income gone rates increases create an ongoing burden.	
A Reilly	Look there is no option here that accurately reflects what my needs, as a ratepayer are. The absolutely inaccurate portrayal of the rates increase is nothing short of disingenuous. How many rate payers in actual fact have a 10% increase? Certainly no one in Tuatapere township. If roads and bridges are priority, other projects like office renovation should be deferred. Submitter proposes delay of expensive non-urgent projects will result in a smaller rate increase.	
Bill Marshall	It beggars belief that the council has not had a fund for replacement and renewal these last 80-100 yrs. You couldn't run a farm business this way because people couldn't afford to pay the price of food if we expected them to pay jam. Trust me. You keep squeezing these little rural townships and they'll become ghost towns because no one can afford to live in there. Maybe this is the long term plan and have everyone in cities.	
Graeme Stuart	We believe that with more external borrowing, there will be an option less than 10.15%, which will be worthy of consideration.	
Mat Darling	I disagree with the distribution of rates increases across the different sectors, particularly where frequent infrastructure users (e.g. remote bridges and roads) are not proportionally paying for their use. I challenge the Council to think harder about a user pays model, particularly where an operator (dairy, forestry) will proportionally cause more damage to such infrastructure (with frequent heavy traffic) for their own financial upside. This doesn't make sense for us, community (non industry) ratepayers to subsidized these activities through our rates. I ask the Council carefully considers this and provides further transparency around this.	
Alan Bryce	What is the median income of Riverton town?	
AF and PK Mark	Sir/Madam, As a ratepayer from Manapouri for 40+ years, I make the following submission on the SDC's Long-term Plan Consultation Document. Preamble: I am most curious to understand the differential Valuations and Total Rates that are quoted on page 24, between Residential Manapouri and Residential Te Anau, given their respective sizes and populations: 1. Land Value: $430,000 vs $138,000 2. Capital Value: $850,000 vs $510,000 3. Total Rates 2020-21: $3401 vs $2995 An explanation for this situation would ne much appreciated.	

Kim Reilly – Southland Federated Farmers	Southland Federated Farmers (SFF) recommends that SDC not adopt any of the options for the impact on rates and instead seek to smooth the forecast increases of rates by: • driving value for money in operating spending • reprioritising its capital spending to allow it to make greater use of debt to fund capital spending in the Transport activity • review all aspects of its expenditure to ensure it is appropriately phased, controlled, and directed to maximise its benefits; • ensures the most cost efficient and effective options are taken for the projects, including through competitive tendering; SFF acknowledges that SDC is facing significant challenges and should invest more in its infrastructure and support its preferred spending options for roads and bridges. Using debt to fund capital expenditure on long-life assets (such as roads and bridges and the 'three waters') is wholly appropriate and consistent with the principles of intergenerational equity. SDC reprioritise spending in roading and bridges and focus on the value for money by revisiting or deferring some of its very long list of capital projects this would help cut any deficits. Lessons from the past, such as the costly court case associated with the Around the Mountains Cycle Trail, are not forgotten. Ratepayers cannot afford 10% annual rates increases at this time, especially if Environment Southland imposes even larger rates increases to meet costs imposed through the Government's Essential Freshwater reforms SFF notes the large increases in Community Resources and Environmental Services despite the primary concern in the consultation document being about roads and bridges. Noting the especially large amounts budgeted to replace the Invercargill office, Winton office, and the Open Spaces Strategy Capital Development (unclear what this refers to), Te Anau Airport's runway surface rehabilitation and Stewart Island's Golden Bay wharf renewal. Are these 'must dos' in the current economic climate?	
Geoff Lindsay	Close the cycle Trail & put maintenance money into roads. Cut office expenditure & staff numbers in office. Cut expenditure on	

	admin, & radio advertising, it is a waste of our money. Put money from this into roads where it is meant to go.	
Ann-Marie Humphries	Stick to the core council functions. Too many consultants, and to much talk, more action / work needed by staff.	
Daryl James Carr	Stop spending our money on shit that doesn't need done. We don't need all these new toilets and we did not need all this steel barriers on our bridges. How much was spent on this. You do not deserve a pay rise. You can go without for a year. You should be sticking up for us as rate payers, not turning us against you and we should be voting on the big-ticket items e.g. Eastern Bush water system/new toilets just to name a few.	
Rates Increase – no increase as I don't receive services		
Alicia Watson	No increase. Why should I pay more when I live in Mossburn on septic tank with no public amenities	Councils across New Zealand partner with communities to provide collective services to all. Each ratepayer will be providing for both district and local services – for those without access to drinking water, there is not a charge however townships stormwater systems create settlements for residents that live, work and contribute to the overall Southland District economy.
Lee Yasar	I don't even use your stormwater network for my dwelling. I had to pay thousands of dollars for a soak pit. Does that get deducted from my rates? Decrease in areas where services are not being used.	
Leon Harrison	Rates are far too expensive full stop, we have our own tank on our property so we get rain water as well as town supply, my entrance to my property needs fixing, I pay for a lot of money for not a lot in return. Explain why our rates are so high.	
Oliver Jackson	I don't even have stormwater at our house on Carran Court	
Peter Hogg	Maybe should have been done the years prior to this instead of wasting money on a cycle trail that is not finished	
Rates Increase – no increase as unaffordable		
Fleur Harding	Tuatapere people cannot afford this rate rise. Towns and infrastructure have been neglected. We feel like we are paying for everyone else's services and do not feel heard. Can't see improvements in rural areas and have to ring council for services in rural areas, as it is easily missed or not done properly. LTP consultation was inadequate. The answers as to why rates are increasing is not communicated effectively. The consultation meetings were a waste of time. It is unaffordable to live with the proposed rates increases. Tuatapere is a forgotten town and we have not received the answers we needed in a way that can be understood. $200k for toilets in a playground is unacceptable, other more cost-effective options need to be considered	Staff are unable to provide the current levels of service across the Southland District without further funding. There are three key factors affecting the affordability of rates in Southland. • The cost of providing the levels of services we have in our activities. These costs reflect many factors including inflationary pressure, ability to resource, location, increasing statutory compliance standards • The fact that our communities are geographically spread out and the population is small to fund the costs. This results in
Dave den Hertog	It's a sign of the times we are in surely you guys can see this. How do you expect to bleed this out of an already bled stone?	

Kiri Klein	No increase. Not the right time. We are all working on budget cuts - you can too. States that cannot wear an increase in rates, let alone the large increase proposed. Te Anau can't. Southland can't. New Zealand can't. This is not the right time to do this. Roading is not a priority for people who have lost jobs and income. Need to use other avenues get a true picture of situation. There's no reason you can't use platforms like community social media pages to gauge how the people feel about proposed changes to rates.	our inability at times to get economies of scale e.g. having multiple sewerage treatment plants instead of one. • The individual circumstances of ratepayers at any time Council has the inevitable task of trying to maximise and satisfy expectations whilst minimising costs. It must however do so in a manner that complies with its legal and moral responsibilities. To do this the tools Council has include • Reviewing the activities and levels of service provided in conjunction with its communities • Looking for efficiencies and cost effective ways to provide its operations • Ensuring that it has policies and processes that encourage the best value for money • Ensuring two way communication and understanding between Council and its residents/ratepayers, ensuring that the right conversations and facts are being had • Obtaining, providing and encouraging the use of any funding options for the Council or the ratepayer • Utilising the policies it can enact and the rating tools it has to achieve the desired outcomes Council as part of its Revenue & Financing policy reviewed the funding methods for each activity taking into account those who benefit from the activity and how, those who cause the activity costs and how and overall the affordability on the community in whole or part. It also reviewed the choice of rating tools available in sharing the costs collected from rates. Councils rating tools are blunt, in that it has no ability to directly rate those who "use the service" or those who can afford to pay more, based on their income. Often charging rates on the capital value of a property is used as a measure of the "ability to pay". The majority of Councils residential rates are fixed charges (around 88%), they are related to sewerage, water and rubbish, The community board rate is also a fixed rate, reflecting the ability of equal access to local services such as footpaths, streetlights, reserves etc.
Vic Lanaway	I cannot afford to live in my house with these exorbitant rate increases every year.	
Alistair Faulknor	My rate increase (proposed) will be over 20%. On a pension even with a deduction from the government, is way over the top. The SIESA rate of $200.00 is what I object too. The cost of power on the island is high now and because the price of diesel is low, there is money going into the reserves. Why can't the reserves be used for maintenance and replacement work? Limits on vehicles.	
M Wilson	Don't prefer any options above. Don't have any more money	
Don Egerton	I'm sorry but a lot of Tuatapere people are old and on one income how the hell do you expect them to pay an increase with all the other costs that have increased. Suggest reviewing use of 4x4 cars. Have seen up to 3 at the same place and apart from all wearing Hi-Viz not much else was happening. Review what it costs to run the council and start trimming 18 percent of that cost.	
Brian and Bev Evans	Smaller increases each year to give ratepayers breathing room. Small towns i.e. n/caps will have 18% increase this year $420 extra if option 1 is approved. Most of the residents are retired or unemployed. Also raised: • community leadership group is overstaffed. • RFS is not working, as staff don't reply or attend most of the time. • more staff on books but where are they - we never see them. Start with staff on the ground actually doing something • engineers promise work and repairs that never gets done. Coal resources should also be looked into. Rates rebates no longer apply to 80% Pensioners as totals have not increased in 3/4 years.	
Denis and Ngaire Bartley	Wellbeing of certain ratepayers will be affected by any increase in rates. This affects the wellbeing of our communities. A fairer	

	distribution of wealth is needed to ensure a better wellbeing of communities.	As well as the rating tools used and encouraging its rate payers to seek financial assistance from central government through the financial assistance hardship grant or the rates rebate grant, Council can also through its remission and postponement policy provide options to assist with potential affordability concerns.
Imelda Sutherland	Needs vs Wants. Council NEEDS to be putting their people FIRST. My income last year was under $10,000. I am not on a benefit. I have no ability to earn more.	
Janine Pope	NO - WE CANNOT AFFORD A RATES INCREASE	
Brent Carran	Rates increase not affordable	
Conrad Waihape	Cannot afford rates rise. Financially struggling whanau, farmers and pensioners Increase of rates while our community is already struggling. The rate of the increase up $500 at least for this year. Transparency of where the rates collected in Ohai/Nightcaps are going or how much is coming back to our community.	
Jaspreet Boparai	How has the effect on community of three drastic rate rises in terms of affordability. Repeated underinvestment in assets/inadequate depreciation provisions	
Ronald Henry Baxter	Continued under investment in assets leading to a large blowout in costs	
Beverley Osborn	The third key issue is that of rates. I note that in the consultation document SDC has indicated a preference for the Option 2 rates increase of 10.5%. However, in a Southland newspaper article last week, it was reported that for Stewart Island residents the increase would likely be around 18%. This would make a significant impact on the ability of some residents to survive financially. I wonder whether research has been done on the proportion in each local area of residents on fixed incomes, e.g. Superannuation, or on the median incomes for each local population. Obviously, the outcomes from an Option 1 rates increase are desirable, because increasing debt is a short term only solution. However, any rates increase needs to be measured against the satisfaction in each local community over SDC's specific proposals for work planned in that area and against the financial ability of ratepayers to maintain adequate quality of life in their home places. I am unable to indicate a preferred option on this issue. I approve the outcomes of Option 1, shudder at the cost of how they might be reached and am nervous about the effects of significant rates increases on a number of residents.	
BC and JA Cronin	Disagree with the 20% rate rise for Stewart Island considering the high price of power and the number of pensioners living here. Why should we pay for the roads and bridges when the damage is caused by logging and milk trucks. If the rate rise goes ahead will seriously thing about leaving the Island as it will be too expensive to live here on a pension.	

Liz Newell	Most rate payers are unable to keep affording large increases in their rates. The council need to stick to doing what is absolutely necessary for the next few years until tourism picks up again at least.	
Terry MacNamara	Please consider the impacts rates will have on our community We have older people to consider.	
Paula McKenzie	Many ratepayers on low and middle incomes in the Southland District Council area will struggle to pay the rate increases being proposed. At a glance one would think that the preferred option means a 10.15% rate increase. In reality this equates to a 17 -19% in Tuatapere. This consult document is misleading. But then if you live in Tuatapere you may not have even received the LTP. Surely this must be in breach of Local Government legislation whereby ratepayers must be adequately consulted. I feel sad when I see the projected waste of money by SDC going forward. So many people in our community are struggling. We may not be in Covid lockdown but many of our communities have been impacted greatly by it. Across our province, our suicide rates are sky rocketing. I am looking at the LTP wondering why the SDC Invercargill office is having 250,000 odd spent on refurbishments in the 21/22 year and then being replaced two years later at a cost of 10 Mill.!! We understand the situation with roads and bridges. We understand that previous councils have been remiss. It is always easy to blame others, but that still doesn't change the fact that many of our smaller communities will be severely impacted by high rate increases. I submit that this proposal is in breach of Section 101(3b) of the Local Government Act 2002 where Councils must consider Rates affordability in financial management Local councils are designed to act on behalf of the communities they serve. I feel that the SDC is not fulfilling their obligations in this respect.	
Rates increase – 10.15%		
Trina	Storm water doesn't affect my property as it just floods my lawn front from road run off, all storm-water drains we maintain ourselves, SDC has come when required, so we really prefer no increase, but guess the money has to come from somewhere, maybe for storm water you need to look at each actual town that's requiring it	Council notes the submitter feedback for those that have chosen to support Option 2 – 10.15%. It is also noted that many of the concerns outlined in the submissions are similar to those key themes outlined in the responses above including affordability, efficiencies, accountability, prioritisation, covid-19 and not receiving services. Submitters have also identified if Council could use debt further to offset rate increases. Currently debt is exclusively used to fund capital works excluding the roading programme which is fully rates funded due
Mandy R	As long as this is absolutely the most the increase will be across the board. I've seen my predicted rates increase is more than this, for many people districtwide it appears it's more than 10%.	

Richard Clarkson	Would like to see great efficiencies being made across the board with regards to accountability. Also, more communication between departments and listening to/using community expertise when planning works as often locals have a better understanding of where the work needs to occur.	to the steady annual programme of work. The use of debt to fund operational costs would not be prudent.
Sue-Anne Saunders	I do have a problem with the rural water rate increase being so large. We pay full rates but are far enough out of town so cannot make use of any of the council facilities that town rate payers have access to such as waste removal, water treatment plants and other conveniences, but we still pay for them. I find the price hike in one of our basic rural necessities that we have to self-provide and use to sustain ourselves and livelihood, is disgraceful and the impact not fully thought through. Shame on whoever came up with the numbers!!	
Ivan Fitness	I live in my own home and in a few months, I shall be on a pension so any increase in rates means less money for me to spend. However, as part of a community I like to see people doing well. I get pleasure when I see paddocks of bale-age ready for the winter. I enjoy cycling on good roads and camping in many places etc. We, as a community need to encourage people to work for a living. I see far too many people living off others and not contributing to our community. This means that people who consume our services, use our roads, etc. contribute nothing to the things they use. They are a net drain on the community.	
Christine Buchan	Even though a rates increase is not desirable for anyone, we do need to realise that we need to put more into our infrastructure to be able to move forward and attract people to move to our communities. I do however think that rates should not be uniform for all and that the council should seriously consider how they charge the rural residents for their rubbish collection service. Because our bins are not collected at the end of our drives I don't believe that we should pay the same cost as those who have it collected at their gates. I think that it is commendable that rural residents use the service as I totally believe in recycling and the benefits for our environment and therefore they should have the same service as everyone else or a reduced rate to accommodate the fact they have to transport their bins some distance for collection. I do believe that more rural residents would take up this service if this was looked at and made a fairer system....this in itself would provide extra revenue for the Council and help with rates in the future.	

Chris Sara	Water is the lifeblood of human existence. If fixing roads and bridges is sensible then fixing the water issues is unarguably the most important actions we can invest in. As a business owner I would be willing to pay greater rates to maintain and improve the services that allow us to operate. We are better places having a means of cost recovery that the fixed income ratepayers don't. We must all contribute as we all benefit and it will be painful to some and merely annoying to others, but the facts are we need to pay for the life we want. But, be effective and efficient when spending the rates. Spend as much locally as it recycles through the community and hence not as expensive as it appears. Our well-being is all related to the state of the community, our communities exist through the infrastructure, therefore investment is essential. I support a bold approach and you will not lose my vote just because I have a bigger rate bill	
Carla Kupe	Would like to know how much our rates would go up?	
Henderson Brian McArthur	Essential work time, don't see why Southland should need to pay when every one else pays sweet nothing in NZ. Just look at green Auckland, they pay nothing just to get handouts.	
Hamish McMurdo	I have selected this option only if the work is actually completed in a timely manner.	
Owen and Cathy Copinga	Given the spending requirements on core infrastructure assets in the future, Councillors would fail their duty to all ratepayers if rates were not increased by at least option 2	
Rod Sinclair	If we don't increase this spending on Infrastructure then as a society I believe we will start to go backwards. Let's spend the money and get it done!	
Greg and Liz Weake	Happy with option 2. Reserves are a moving feast but I recognise the stormwater/waste network needs proper assessment and upgrading as identified.	
Ivan Dale	Probably should be option 1 - but doubt whether many would wear it	
Max Slee	I trust the council and the councillors will use this extra rate-takings for the purpose intended, roads and new bridges. Get on with it. Not to be used on consultants and shiny arse's and extra staff. Please take this on board	
Larina Harris	I prefer option 1 however I realise a lot of families can't afford this and that includes those whose rent will increase as landlords pass on extra cost	
Ian Smith	Option two - but it is only delaying the inevitable. we need to maintain current levels.	

Anita Gleeson	Some communities are facing a rates increase which is well in excess of the proposed 10.15%. In my case closer to 20% increase. Ratepayers need to see value for the increase - in other words their community has to benefit. For council this means carrying out the LTP as planned and making sure that there is benefit for all.	
Neville Lindsay	This is a massive rates shock to everyone. Hundreds of ratepayers are going to be struggling to pay or cannot afford it. It is obvious the councillors have no idea of the economic consequences you have loaded onto ratepayers. It is very easy to increase rates but now SDC has to take a very hard look and slash more unnecessary expenses. There are plenty more. An audit of finances and staff requirements is required. Council vehicles to be used for work only, not getting groceries etc. These rates increase is major so you have to trim costs somehow regardless.	
Doug Ramsay	Even option 2 is a large increase for those on fixed income and little in the way of investments. I am concerned that you want current ratepayers to pay increased capital costs and also the depreciation on those assets - hardly equitable.	
Diane Andrews	My main concern is that the SDC operates efficiently. It really concerns me when money is wasted. Let's think local when spending local money.	
Youth Councillors	We believe an increase of 16.54% would be too drastic, while the option of 7.95% is too detrimental in terms of reduced maintenance and projects. While we are in agreement with the preferred option, we ask Council to have increased consideration for lower incomes families in this challenging economic environment.	
Ann Robbie	Encourage all households to store water - i.e. tanks for all buildings and not to expect water delivery to SDC townships all the time. Everyone should be self-sufficient for at least 7 days. Water wastage is very high and I also feel that Diary farmers need to be a little more cautious with the amount that they draw from water resources. Everyone should have a tank supply that at a minimum could be used to water gardens, water stock, fill their pools etc.	
Nathalie van Veen Pahl	This would be okay if 10.15% was actually 10.15%, for everyone. Not depending on anything. Instead it seems to be some sort of average which is very unfair on small communities. Why our small community ends up paying a whole lot more is not clear to me and the booklet did not help with that either.	

Allan Baird	Option 2 is still a high impost on the community recovering from Covid-19 issues. The money must be used effectively & efficiently in the community. Control the spending to the key areas discussed above & limit the drift to the "nice to have". Actively explore ways of working with other local TA's in the areas of shared services. Roading should be investigated with Gore DC & ICC on ways of delivering more service for less cost. Remove duplication in administration & have more bargaining power with roading contractors.	
Colin Smith	Option 3 is a no go. It will continue to run our infrastructure down. Option 1 is too big of an increase and not sustainable in our current environment. Option 2 is also too big but necessary. Council will need to prove to its rate payers that it is spending their rates on improving infrastructure by visibly making progress. Accountability and efficiency by both council and its contractors will be an important part of this rate rise something in my view that is not happening now.	
Sarah Greaney	Impact on Rates for 2021/2022: The Board notes that a 10.15% increase in year one and a 10.18% increase in year two is actually an averaged figure across the District. The true impact for Fiordland is much greater with a total rate change of 12% outlined on page 24 of the consultation document, a district change of 15% for residents on district rates and an 18% change for residents on the service rates. This will hard hit in the Fiordland area. The downturn in tourism that has impacted households and businesses is significant and has taken millions of dollars out of our economy. We note that the financial projections show a $12M surplus in year 2030/31. If these surpluses are projected, we ask whether additional borrowing to spread the costs across further generations is a more tenable approach along with forecasting beyond the 10-year mark, particularly as the net debt is forecast to be significantly below the net debt limit. The Board will support Option 2, only if Council evidences that further borrowing closer to the net debt level is not a more appropriate approach to funding rates. It notes the contents the years of underfunding infrastructure requirements and the three key areas for comment. It is disappointed that this situation has been allowed to arise over time. The impact for our ratepayers now emerges at what has been the most challenging time for over a decade and will have an effect when many can least afford a rates increase. The Board is aware that the rate relief policy is also being reviewed. This policy requires some targeted communications to potentially	

	affected parties. We believe that Council has been remiss in over-reliance on social media to advertise various strategies and would ask that further efforts be made to ensuring communication reaches the right audience e.g. via flyers to Fiordland Community House, Jubilee Budgeting and the Library	
W F Doherty	Perhaps if Council cut back on expensive consultants and made the decisions we elected you for, we wouldn't need such large rate increases. Council should look at ways to keeping internal costs at an affordable level and try and save money across all parts of the council. Governance is a large cost and now we have Community Boards that are paid with less representatives in the areas than when we had CDA's that volunteered their time.	
Carolyn Smith	Council should try and keep the rates at an affordable level as there will be a number of people that will struggle to pay large increases and high rates will discourage people to come and live in the Southland District.	
Les Scown	I have reluctantly ticked option 2. You (the council) re paid by us (the ratepayers) to manage our assets. In the recent past you have wasted out money on frivolous projects that have consumed a huge amount of money for a little or no return. I feel like I have shares in a company that always had its hand out for funds but is still going backwards. In 2010/2011 the rates on our property were $1996.22 - In 2030/2031 they will be $4913.30 if the proposed increases are carried through. A massive 146% increase. Inflation over that time period is likely to be 30% So, its time. Use your money wisely. Get the essential Infrastructure sorted. No more Frivolous Spending. No more excuses!!	
Letitia McRitchie	I would like to see this as a uniform rate increase and for the rate increase on Stewart to not be at the proposed level. I believe that the visitor levy should be used to fund proposed planned work, i.e. siesta upgrades	
Brian Church	Maybe, instead of spending money on flash new tables, you could just keep using the old ones and stop leaching of people that are just trying to get by. Ask volunteers to do biodiversity work, or offer rates breaks to locals e.g. farmers, beneficiaries, to do the planting (maintenance). Then you could get the proposed long term rates value increase in labour, that is rumored to end up almost doubling the already ridiculous rates.	
Wendy Knowler	Delaying stormwater access ment may be an advantage as there is ongoing changable issues from Government. Reserves should be used where necessary as their value continually decreases	

Stephen Hoskin	I suggest reducing 'leadership' expenses in council, aiming for half of current spend. This appears the least value for money aspect of rates that could be diverted into roads, bridges, trails and other more productive, tangible and beneficial outcomes	
Amanda Pink	You say our rates will go up about 10.75%, however my rates will be going up 17% which seems very extreme. We are getting a couple of footpaths and losing part of our recycling. How can this be justified? Surely the costs should be spread out more amongst the areas requiring more infrastructure updates. We already pay $90 per month standing charge for electricity (most of the country pay $10) and 3-4 times the national rate per unit of power. A lot of the council money is going to be spent on replacing bridges and roads.....we only have one bridge (very small) and 23 kms of road, mostly unsealed. Some residents are having their rates increased by over 20% here. Other areas are mostly in the single digits. We bring a lot of the tourism to Southland and have to bear the footprint this has on our small community but it appears we are being punished for this with the rate increases. Real journeys captures most of the tourism capital and do the most damage to our roads, we shouldn't be punished for the destruction they cause. I understand it costs money to maintain Southlands infrastructure but surely it could be more evenly spread. I do hope you take this into consideration. I also write this to represent my 86 year old mother and her aging siblings who also love on the island. My mother in particular has no savings and no other income than the superannuation. She desperately doesn't want to have to leave the island where her family have lived for 6 generations (on the european side) just because she can't afford to pay her rates. More than 25% of our permanent population of 400 is over 60! I do hope to hear some good news coming our way regarding the above.	
John and Lisa Hay	Council has let us all down with gross under investment in critical infrastructure for decades.	
Ray Haanen	Council needs to focus on core business of water, roads and waste waters, all councils are spending serious monies on going back and forth to wellington to get govt to move dates forward for discharge to waterways, i.e. black water waste?	
Deanne Barrett	How about printing your booklet with paper that we can start the fire with? Then it gets two uses.	
Noeline and James Evans	All residences and businesses have taken a large drop in income. Did Council take a drop in the salaries? Submitter suggests reduction in number of councillors to serve areas.	

M H Snoep	As Manapouri ratepayer for a very modest cottage, proposed rates are prohibitive.	
Rates increase – 16.54%		
Alistair Weir	If it needs to be done then just do it, but in the most efficient manner possible. I'm happy to help pay for it.	Council notes the submitter feedback for those that have chosen to support Option 3 – 16.54%. It is also noted that many of the concerns outlined in the submissions are similar to those key themes outlined in the responses above including affordability, efficiencies, accountability, prioritisation, covid-19 and not receiving services. Submitters have also identified if Council could use debt further to offset rate increases. Currently debt is exclusively used to fund capital works excluding the roading programme which is fully rates funded due to the steady annual programme of work. The use of debt to fund operational costs would not be prudent.
Sarah Cowan	Either option 1 or 2 has my vote, I think building up a reserve for the future is wise, but not at the expense of making rates unaffordable for those on lower incomes. So, for me it depends on whether the rebate scheme would reflect the increase or not. Unfortunately, the rates tool on this website did not work for me, so I was unable to see how the changes would affect me personally	
Pat Killeen	Not happy about the huge increase, but know that sometimes things just need doing. This won't sit comfortably with ratepayers who are out of work or retired and not well off. This doesn't alter the fact that increases are justified. Sometimes there is no easy out.	
Stephen Keach	Given what might be coming at us with more extreme climatic events, I find security in the idea that reserves are built up. Options 2 and 3 also sound to me like further 'asset sweating'. It is unlikely we would be happy if stormwater systems started collapsing around us, despite also not being happy with a large rate increase. 16.54% is a frightening figure, especially when most of us are unable to easily increase our incomes. But when a rainy day comes and the reserves aren't there, are we not going to suffer then? Or can we hope a kind central Government will be profligate with assistance? Council's preference for Option 2 shows careful thinking at play. If Option 1 was chosen, a watchful connection to ratepayers would be desirable, to identify and assist those struggling to meet their rates. Because some would.	
Sarah Theone	I think it is very important to be funding improvements to water quality across our urban and rural communities, and this option would also reduce council debt, free up some reserves for future use, and keep up momentum on our stormwater condition assessment and maintenance projects. Also, it gets the big increase out the way in one lump, which seems very economically sound.	
David Boniface	SDC needs to get ahead of its backlog. It is time to bite the bullet and get on with it. Do you have any assets or investments such as forestry that you can sell off to assist funding? I am sure you	

	could examine a number of funding models and reduce the impact on ratepayers.	
Norman and Helen McLeish	Our Bridges need fixed. Ambulance was called to my great niece - which the Ambulance was told the bridge was closed - causing the ambulance to have to go around an extra block - precious time was lost. The baby was having breathing difficulties & age approximately 7 months.	
Maree Whiteley	Along with all NZ'ers, urban and rural we have to address the water standards, and delaying this will just incur increase costs further down the track. If the rural sector is required to improve the water standards upstream or downstream - it needs to be seen to be a whole province working together on the same time frame.	
Tom Rouse and Sue Fuller	We support an increase in rates providing it is spent on providing essential sevices to rate payers rather than tourists. There should be levies or charges that tourists pay to access our facilities and attractions so they pay their way.	
Gemma Marnane	Increasing rates with an increasing working population and youth leaving the district for further education for instance means there will be more pressure on those financially impacted, those with illnesses/disabilities will be further disadvantaged by rate increases, even if they cannot get full use out of roads/bridges being built. An approach in consulting those who are in low socioeconomic areas, those who must travel more, have an unstable income, youth leaving home will make sure we still push equity and financial stability alongside the projects the council are doing by allowing people to work towards creating sustainable incomes. A wealth tax approach could be taken to ensure equitable and sustainable development.	
Myles Greber	"Why has there been no consideration for taking out a loan to 'smooth' the rate rises? We are in a period of the lowest interest rates in many people's lifetimes. I would like to see Option 1 with a loan taken to reduce the first year 16.54% rate rise down to the 'limit' of 8% with repayments distributed across the 10 years (I understand rates would have to rise to account for the compounding effect - the goal would be to keep below the 'limit' of 8%). Surely something like this could have been proposed to 'soften' the increases over a longer period?... It is beyond my comprehension why the rating boundaries used by SDC are not graded to distribute rates more fairly. Currently you are either in a township or you fall off a cliff and you are in a rural area. It would be such a simple process to either place a 'donut' around	

	townships where ratepayers in the 'donut' pay Semi-Urban rates, or calculate distance via roading from a township and ratepayers within a specified distance would pay Semi-Urban rates. This would go a long way to distributing rates more fairly. There must be a reason? But I'm not sure what it could be." Recommends the Council take a more prudent approach to spending, and assess schedules of maintenance. Urgent maintenance to be covered from unbudgeted expenditure. Recommends to reduce the excessive rate by dropping $20,000 for the Tuatapere Te Waeaae Community Partnership Fund. Recommends publishing an estimated rate rise for local ratepayers allowing members of the Board and ratepayers to be better informed and have time to take appropriate action before the LTP process begins. The Council should be somewhat ashamed that no one appeared to realise how high the rate rise in Tuatapere was going to be under the proposed LTP. It is at odds that one of the highest percentage rates rises is occurring in a community with known rate affordability issues. Concern raised at the lack of knowledge of Councillors, community board and staff at the effect the LTP would have on an entire community. Recommends a review of the proposed spending/budget of the Tuatapere Te Waewae Community Board to reduce the targeted rate, and notes the smaller rate payer base to ensure prudent spending as a Board.	
Gretchen Boyd	Gradual implementation of the living wage	
Maddie van de Wetering	Although I agree with a rates increase, and am in the enviable position that my household can afford it, I think there should be some understanding about the impact of Covid on the local community when implementing any increase. Here in Te Anau many people are finding it tough, some have already had to sell their homes and move away as their jobs have disappeared with the international tourists and small local businesses have taken a hit. There is definitely less cash in the system and a big rates increase on top of that might be the final straw for some people. If people leave Southland then (aside from the massive losses to the community of friends and colleagues) the costs across the region will be shouldered by an even smaller resident population - so please think carefully.... Thank-you.	

Attachment 4

Issue and options paper – District and local issues

Background

In addition to giving feedback on the three main issues outlined in the consultation document, submitters commented on a range of issues relating to district/local issues and operational matters. Approximately 213 comments were made on district and local issues. A summary of the comments is given below. The table at the end of this paper includes summaries of the comments received. In the table, staff have responded to the submitters' comments, and in some cases, have proposed a response. Proposed responses have been called actions, and these actions are highlighted in yellow.

Issues - Summary of Feedback

Staff have grouped the feedback received largely in accordance with Council activities. A brief summary of the feedback received is outlined below.

Open spaces

There were 36 submission points about open spaces. These comments discussed Council taking a lead with multipurpose trails, considering active communities and play in all decision making, and there was a suggestion that Council adopt and implement the Southland Regional Spaces and Places strategy. Feedback was also received about walkway maintenance, and developing the Te Anau lakefront. There were specific requests for further beatification in towns, questions about proposed spending on playgrounds, requests for funding for community pools, and requests for differing levels of service for mowing.

Community facilities

Four submitters did not support money being spent on a new office building in Invercargill. Two of those submitters suggested staff could work from offices in the District. Spending on toilet facilities was raised, with five submitters commenting on the proposed toilet projects in Tuatapere. Four submitters provided feedback about the Tuatapere Main Street investigation plan.

Two submitters commented about the Winton library refurbishment. Three submitters opposed combining the Te Anau office and library sites.

Seven comments were received about halls. Two submitters requested that the Ohai and Winton Drill Hall be disestablished. Other comments related to maintenance of halls at Tussock Creek, Five Rivers and Tuatapere RSA.

Community services

One submitter commented that the $250,000 allocated for the extension of the Riverton cemetery is excessive.

Environmental services

Comments regarding environmental services were varied, and included:

- Resource Management Act 1991 functions – subdivision and land use (12 submissions), including seven submissions requesting more land be zoned for residential settlement in Athol township

- regional council functions – pest control, burning of waste, water quality (five submissions)
- climate change (eight submissions)
- National Policy Statement for Indigenous Biodiversity (three submissions)
- earthquake building standards (three submissions)
- freedom camping (three submissions)
- Short-Term Rental Accommodation (STRA) (two submissions)
- dog control rule enforcement (two submissions)
- Council's obligations under the Heritage New Zealand Pouhere Taonga Act 2014 (two submissions)

Footpaths and cycle trail (transport activity)

Four comments were received regarding footpaths on Stewart Island/Rakiura, including opposition to proposed footpaths on Horseshoe Bay Road. One submitted stated that the Around the Mountain Cycle Trail should be sold by Council, due to the cost to ratepayers.

Airport (transport activity)

Six submissions were received regarding the Te Anau Airport Manapouri. Three submitters believe that the airport should be rationalised, due to the ratepayer burden. One submitter stated that the airport should receive central government funding.

SIESA

Comments about SIESA were received from four submitters. Two opposed the administrative costs, one supported the proposed changes to SIESA funding and one requested that Council investigate offshore wind turbine options.

Water facilities

Two comments were received regarding funding of the Manapouri/Pearl Harbour ramps and gabion baskets project. One submitter opposed the propose refurbishment of the Tuatapere boat ramp.

There were four submissions about Stewart Island/Rakiura water facilities. This included support for the proposed replacement of the Ulva Island jetty and Golden Bay wharf. Two submitters felt that funds were not being used efficiently for the replacement of these two water facilities. One submitter supported using the Stewart Island/Rakiura visitor levy to fund these replacements.

Waste services

There were eight submission points about district wide waste services. Three submissions related to the AB Lime consent application issue. Five submitters raised points about specific locations, including requests to address the retired landfill at Colac Bay and praise for the green waste/dump and recycling depot in the Oraka Aparima Community Board.

Three Waters

Ten submitters commented on district wide three waters issues. There was feedback both in support and in opposition to the proposed central government reform to the three waters activities. Three submitters provided feedback on local matters, including how stormwater is rated in the Tuatapere Te Waewae Community Board, a specific stormwater issue in the Wallace Takitimu Community Board and a comment regarding the Curio Bay wastewater facility.

Community leadership

A wide range of feedback was received in the 32 submissions about community leadership. Topics included:

- the LTP process, content and delivery of consultation document (nine submissions)
- Great South's role as Southland's regional development agency (four submissions)
- local government democracy/election process (two submissions)
- opportunities to meet with councillors informally (two submissions)
- strategies to help community boards with decision making (ie/arts, health, recreation) (two submissions)
- amalgamation of local authorities in the lower South Island (two submissions)
- support and opposition of community boards (two submissions)

Rates and finance

Submitter points in this category included:

- clarification regarding $25million debt security stock (three submitters)
- rating and regulation of short term rental accommodation (three submissions)
- rates remission and postponement (two submissions)
- benefit to Fiordland of increase in rates (two submissions)
- allocation rules around the Stewart Island/Rakiura Visitor Levy
- property rating boundary review.

Options

Two options have been identified for how Council could proceed. These are:

- Option 1: to confirm the staff actions for district and local issues (highlighted in yellow in the table below)
- Option 2: to amend to the staff actions for district and local issues

Option 1 – To confirm the staff actions for district and local issues

Advantages	*Disadvantages*
• Council will be responding to some of the feedback received from submitters, on district and local issues • Staff are aware of the current recommendations and have considered the impact etc.	• Council may wish to make other changes.

Option 2 – To amend the staff actions for district and local issues

Advantages	*Disadvantages*
• Council can incorporate any changes as it sees appropriate.	• Depending on the request staff may be required to obtain additional information that may impact on the decision.

Recommendation

That Council:

a) **Confirms the staff actions** (these have been identified and pulled up from the submitter summary table below) **for district and local issues, summarised as follows:**

Submitter No.	Topic	Action point for
Open spaces		
31	consider the Riverton beautification request for the main street	Oraka Aparima Community Board (CB)
254	consider adding an annual grant for mowing request to the Ardlussa Community Board rate for the Riverdale Recreation Reserves Committee.	Council, staff
53	consider the Lumsden entrance beautification request	Northern CB
70	consider the request for an increase in the level of service (LoS) for mowing for Moores reserve	Oreti CB
96	consider the suggestion for a decrease in the level of service LoS for mowing and gardening	all CB's
116	consider a request for a Monowai Village bike/pump track	Tuatapere Te Waewae CB
202	explore option for assisting to fund Te Anau pool	Fiordland CB
239	consider suggestion to prune trees in Otautau	Wallace Takitimu CB
145	consider request to increase shade and provide plantings, and to provide smoke/vape free signage, in open spaces	staff
183	consider providing less funding to Henry St playground in Te Anau, as other playgrounds take precedence	staff
233	review mowing LoS request for Tuatapere	Tuatapere Te Waewae CB
165	consider the request for an increase in LoS for mowing for Stewart Island/Rakiura	Stewart Island/Rakiura CB
Community facilities		
184	consider the Riverton toilet upgrade and changing shed request	Oraka Aparima CB
89	consider a request to rationalise the Ohai Hall	Wallace Takitimu CB
112	consider the divestment of Winton Drill Hall	Oreti CB
Environmental services		
163	update name of statute in Environmental Services AMP to Heritage New Zealand Pouhere Taonga Act 2014	Staff

207	consider only having privately owned camp grounds not providing freedom camping facilities	Staff
164	consider increasing regulations for short term rental accommodation	staff
182	consider more commercial sub-division in Te Anau	Staff and Fiordland CB
Transport activity – footpaths		
181	consider the eligibility requirements for the Stewart Island/Rakiura visitor levy, to ensure they allow funding for footpaths	Stewart Island/Rakiura CB and staff
Transport activity – Te Anau Airport Manapouri		
183	consider whether the airport should be a District asset	Staff
Waste services		
234	consider whether there should a green waste disposal site in Tuatapere	Tuatapere Te Waewae CB
252	consider changes to local waste depot, request for recycling container	Waihopai Toetoe CB
Community leadership		
89, 195	consider more opportunities for staff to meet with Councillors	staff
150	for the next LTP process, consider undertaking informal polls to gauge youth sentiment	staff
151	consider providing funding for trail signage	Fiordland CB
169	consider developing strategies to assist community boards with their decision making	staff
232	liaise with Murihiku Kai Collective to ascertain how staff can provide assistance	Staff
Rates, finance and funding requests		
71	consider rating approach for water supply and sewage services when ratepayer does not receive these services	Staff
237	consider rates funding request for the former court house building	Wallace Takitimu CB

Excerpts of feedback on District Issues

Name	Submission summary	Staff recommendation
Open spaces – reserves, playgrounds, pools		
	District issues	
Douglas Agnew/Jenny and Tony Tippet	Parks and Reserves: P-10821 to P-10825 delete this project, not necessary.	That Council note the submitter's feedback. Staff advise that the figures provided for the playground equipment renewals are based on playground assessment that was completed by an approved playground specialist. Playgrounds are required to meet New Zealand Playground Standards and this work is needed to meet these standards.
David Boniface	Encourages SDC to take the lead with the progression of multi-purpose trails in the greater Southland area, not just 'Around the Mountain'. The benefits accrued in other districts are substantial where the local Authorities, DOC and local interest groups work as a team. Southland is way behind its neighbouring Districts and is not taking advantage of the cycling boom. eg QLDC and Central Otago	That Council note the submitter's feedback. Staff advise that there has been significant investment in multi-use trails to date throughout the district and community boards have highlighted their support through continuing to support the maintenance. A number of boards are looking at additional opportunities through this LTP.
Nathan Burdon - Sports Southland	Submission generally commended Sport Southland and SDCs relationship, SDCs focus on wellbeing, and acknowledged both organisation's shared values etc. Also commended SDC's strategic approach to infrastructure that supports communities being active, and community boards prioritising infrastructure that supports physical activity. Identifies play is a vital element of child development and resilient communities, but is under threat due to a range of factors. Councils can play a pivotal role not just in the provision of fixed assets but by considering play in all decision making which could create time, space and permission for whanau to play. The submission requests SDC adopt the Southland Regional Spaces and Places strategy, along with Council committing to its implementation. Believes that play, active recreation and sport provide a major role in mitigating many of the negative aspects of the pandemic. Sport Southland is currently negotiating with Sport New Zealand to implement a second phase of the	That Council note the submitter's feedback. Southland District Council has a very good working relationship with Sport Southland and have been involved in the development of the Regional Spaces and Places Strategy. Staff have also engaged with Healthy Families and are actively looking at ways in which they can activate the open spaces throughout the district. This includes opportunities for developing play outside the traditional provision of playgrounds.

	Healthy Active Learning initiative which would encompass 26 schools in the SDC area.	
Caldwell	Walkways between reserves need to be sprayed and trees/shrubs trimmed.	Staff advise that this is included in the current township maintenance contract for Te Anau. If this is not happening members of the public have the ability to lodge a request for service (RFS) through Council's 0800 number (0800 732732) or the website (https://www.southlanddc.govt.nz/). Staff will contact the submitter directly as to whether an RFS is appropriate.
Stephen Hoskin -Fiordland Trails Trust	Include Te Anau Lakefront development in the Long-Term Plan (in relation to their trail request).	That Council note the submitter's feedback. Staff advise that it is anticipated all stakeholders would be engaged with during the development of the urban development plan for Te Anau.
	Local issues	
Wayne Muntz	Oraka Aparima CB - Requests beautification for entrance to Riverton and its main street (trees, shrubs, plantings)	That Council note the feedback and request the specific suggestion be passed on to the community board for its consideration. Staff advise that this would be a recommendation for the community board to make and would be an increase in the current level of service.
Richard Clarkson, chair Ardlussa Community Board	Ardlussa CB - The Ardlussa Community Board wishes to provide an annual grant to the Riversdale Recreation Reserves Committee to assist with the costs associated with mowing the recreation reserve in Riversdale. Due to the timing of the community partnership fund allocations, the Board was not able to include an annual grant in its budget for the years 2021-2031 and it now wishes to ask Council to include the annual grant of $2,500 to the Riversdale Recreation Reserves Committee, to be funded by the Ardlussa Community Board rate.	That Council note the feedback and endorse the community board's recommendation for an annual grant of $2,500 to the Riversdale Recreation Reserves Committee, to be funded by the Ardlussa Community Board rate. Finance staff will action this recommendation, if endorsed by Council.
Christine Buchan	Northern CB - Requests beautification for entrance to Lumsden.	That Council note the feedback and request the specific suggestion be passed on to the community board for its consideration. Staff advise that this would be a recommendation for the community board to make and would be an increase in the current level of service.
Wynn Avery	Oreti CB - Questions whether Winton needs an extended shed at Ivy Russell reserve, a $50,000 plan for parks?	That Council note the submitter's feedback. Staff advise that this project was included at the request of the community board and includes other work associated with development in the reserve.
Quinn Stewart	Oreti CB - Requests an increase to the LoS for the mowing at Moore's reserve ground, in particular for cricket. The current standard that is set is Quality Standard 2 where grass is maintained between 30mm and 50mm and clippings are discharged over the mown area. For a cricket team this is not acceptable.	That Council note the feedback and request the specific suggestion be passed on to the community board for its consideration. Staff advise that this would be a recommendation for the community board to make and would be an increase in the current level of service.

Vicki Murphy	Oreti and Fiordland CB - Requests more information on amounts provided for parks/reserves projects, including: - Dipton playground renewal at $68k - Master plan for parks & beautification $50k - Ivy Russell Reserve shed extension $52k - Fiordland CB beautification $260k each year for 3 years, what are they doing? Believes trees planted down Luxmore Drive are a hazard when they shed their leaves each season, blocking road drains and leaves on properties.	That Council note the submitter's feedback. Staff advise that the figures provided for the playground equipment renewals are based on playground assessment that was completed by an approved playground specialist. Playgrounds are required to meet New Zealand Playground Standards and this work is needed to meet these standards. Staff advise that the project at Ivy Russell park was included at the request of the community board and includes other work associated with development in the reserve. The Fiordland CB requested staff provide them with an urban development plan for the main street and foreshore of Te Anau as they felt that it needed to be rejuvenated. The funding in years 2 – 4 is to undertake the works that would be identified in the plan.
Euan Templeton	Believes that the current level of mowing and gardening may well be unsustainable due to the cost to ratepayers. The decision about less of both versus rates increases needs to put back to township residents.	That Council note the feedback and request the specific suggestion be passed on to each community board for its consideration. Staff advise that this would be a discussion for individual community boards.
Peter Zessin	Fiordland CB - Opposes the Te Anau town centre, lake front and boat harbour beautification.	That Council note the submitter's feedback. Staff advise that the Fiordland CB requested staff provide them with an urban development plan for the main street and foreshore of Te Anau as they felt that it needed to be rejuvenated. The funding in years 2 – 4 is to undertake the works that would be identified in the plan.
Terry Macnamara	Tuatapere Te Waewae CB - Requests that a basic mountain bike pump track be included in the Monowai Village playground plans. Suggests seeing if it could be installed in the gravel section on Pioneer land.	That Council note the feedback and request the specific suggestion be passed on to the community board for its consideration. Staff advise that this has not been considered as part of the playground upgrade however could be investigated as a community led project or included in the next LTP.
Noel and Margaret Curtin	Wallace Takitimu CB - Opposes proposed spending Dr Woods memorial park and McGregor park playground. Believes there are children in the town and already playgrounds at schools and play centres.	That Council note the submitter's feedback. Staff advise that council has an obligation to maintain the current assets to the New Zealand Playground Standards. Any decrease in the level of service would be at the discretion of the community board.
Graeme Stuart, Oraka Aparima Community Board	Oraka Aparima CB - CB request an unbudgeted expenditure of up to $30,000 towards the refurbishment and maintenance of the Surfers Statue at Colac Bay.	That Council note the submitter's feedback. Staff advise that this has been discussed by the community board and has support from the local community.
Ann Pullen	SI/Rakiura CB - Requests keeping the walking tracks maintained by the SDC in good order before making any new ones. Get rid of any old structures (Bathing Beach Area) and signpost the new tracks (bathing beach area) Although I am not opposed to new ones, just look after the others first	That Council note the submitter's feedback. Staff advise that the new tracks in Baker park were requested by the community board.
Carole Elder	Oraka Aparima CB - Believes is it inefficient to spend $103,000 on a new park at the whale	That Council note the submitter's feedback. Staff advise that there has been considerable community engagement over the development of the pilot station

	(Riverton) and then another $199,000 just down the road at Taramea bay park as they are so close. Requests that the grass area down to the beach along Towack street heading to Taramea bay to be left as it is (natural). Suggests parks and reserves funds used out at the surfer's corner at Colac Bay. Disagrees with $30,000 on investigating a project for green space. Requests upgrade to the freedom camping area at Colac Bay.	reserve and Taramea Bay. This engagement will be documented and discussed with the community board prior to any work being undertaken. Staff advise that the community board have requested an urban development plan for Riverton to look at a holistic approach to its development. The green spaces would only be one part of this plan. Staff advise that there are projects in the LTP for both surfer's corner and the Colac Bay boat ramp area.
Chrissy Lampitt	Tuatapere Te Waewae CB - Disagrees with Tuatapere proposed project of a $200,000 toilet at the park, maintenance on the toilets on Main Street should get priority. Questions affordability of the Lions Park when there is the park on Half Mile Road. The mowing contracts predicted rise in costs seems rather excessive.	That Council note the submitter's feedback. Staff advise that the new toilet at the playground on Halfmile road has been requested by the community board. They are looking towards the future with the potential increase in visitors to the town with the pending status change to the Hump Track. Staff advise that their recommendation is to remove the Lions Park playground and have been working with the community board to affect this. Staff advise that there has been a significant increase in mowing costs across the district. This is partly due to the increased requirements around compliance with health and safety and traffic management.
Diane Fretter	Wallace Takitimu CB - Requests information regarding the Otautau camping ground. Understands that the building was to be upgraded 2 years ago. The signs are still up, so officially the campground is still there, but tourist (who are increasing in numbers) find no facilities, no information and don't know if they can stay there.	That Council note the submitter's feedback. Staff advise that the community is currently looking at options for the future of the camping ground at Holt park.
Tom Rouse and Sue Fuller	Fiordland CB - Community swimming pool (Te Anau) is a valuable resource. Would like the Council to fund or explore options for funding so the pool can remain open ideally year round.	That Council note the feedback and request the specific suggestion be passed on to the community board for its consideration. Staff advise that this would be at the discretion of the community board.
Pam Yorke, Waihopai ToeToe CB	Waihopai ToeToe CB - CB wishes to give all pools in CB area the ability to access some rateable funds, so all our residents have access to a local pool. If the pool committees meet the requirements that we have put in place, following the guidelines of the Edendale and Wyndham Pools.	That Council note the submitter's feedback. The community board already has a process in place for the Edendale and Wyndham pools to apply for funding, they want to replicate this across the community board area. They currently have a single Waihopai Toetoe pool rate. Note that Council doesn't own any pools within the community board area.
Letitia McRitchie	SI/Rakiura CB - Disagrees with the Stewart Island CB setting aside funding to investigate and install a track network at baker park. There are enough day walks around Oban and there is a need to fund the ongoing maintenance of existing tracks first before funding new tracks.	That Council note the submitter's feedback. Staff advise that the new tracks in Baker park were requested by the community board.

R W Scott	Wallace Takitimu CB - Requests that trees on Natwich and King St Otautau be pruned and cut back, due to birch trees causing health issues, hazardous during wind and are blowing seeds onto neighbouring properties.	That Council note the feedback and request the specific suggestion be passed on to the community board for its consideration.
Katie Jones	Northern CB - Opposes Dipton playground renewal of $68k. That is insane looking at the population and site. The seat and sign in Garston for $7k appears to be quite steep.	Staff advise that the figures provided for the playground equipment renewals are based on playground assessment that was completed by an approved playground specialist. Playgrounds are required to meet New Zealand Playground Standards and this work is needed to meet these standards.
Margaret McKelvie	Waihopai Toetoe CB - A native planting area next to the river beside Wyndham has been ongoing for 30+ years and requested SDC fund a boundary for the sanctuary. Requests to know why Council did not support this. Discusses that garden plots in Wyndham have been concreted over and garden plots leading into Wyndham have been left to revert back to lawn without consultation.	Staff have been requested to provide the community board with a background report on the Wyndham Wildlife Refuge. This was presented at their meeting on Tuesday 27 April. Staff advise that the community board requested staff to provide a gardening plan for both Edendale and Wyndham. This was provided and discussed at their meeting held on 28 July 2020, and gardening changes that have been made were identified in the report.
Bridget Forsyth, Otago-Southland Division of the Cancer Society	Key Recommendations 1. Increasing shade in the picnic and playgrounds by planting trees. 2. Installing Smokefree Vapefree signs at all playgrounds. 3. Invest in green spaces, walking and cycling, and install water bottle refill stations.	That Council note the feedback and request the specific suggestion be passed on to staff responsible for the development of the open spaces programme.
Sarah Greaney, Fiordland CB chair	Fiordland CB - The allocation of funding to the Henry St. playground does not accurately represent the investment in playgrounds that the board needs to prioritise and make across the Fiordland area. There are other playgrounds that take precedence for improvement over Henry St. Appropriate discussions regarding these would have a much lower impact on rates, the outcome of which should be reflected to our community ratepayers.	That Council note the feedback and request the specific suggestion be passed on to staff responsible for the development of the open spaces programme. Staff note the community board's position and will work with the board to achieve the appropriate outcome.
Shirley Mouat	Fiordland CB - Believes that the Te Anau town centre, lakefront and boat harbour beautification costs ($260k and $270k) are unjustified.	That Council note the submitter's feedback. Fiordland CB requested staff provide them with an urban development plan for the main street and foreshore of Te Anau as they felt that it needed to be rejuvenated. The funding in years 2 – 4 is to undertake the works that would be identified in the plan.
R & A Johnston	Believes playground equipment should be reduced and equipment used than can be used by multiple users at one time and perhaps new people every five years as cost are considerable.	That Council note the submitter's feedback. Staff advise that they are working with community boards to make sure that playgrounds meet New Zealand Standards and at the same time are designed to achieve a better play experience for all age groups.
Myles Greber	Tuatapere Te Waewae CB - Requests level of mowing and maintenance to be reviewed as previously discussed as believes potential planting	That Council note the feedback and request the specific suggestion be passed on to the community board for its consideration. Staff advise that there has been a significant increase in mowing costs across the district. This is partly due to the

	of wild flowers could be a tourist attraction. Lions park/playground is small, seldom (if at all) used park/playground and possibly not needed. Funds spent here would be better spent on the Jack & Mattie Bennett Memorial Park. It would be better to have one good playground than two that are not so good (or excessively high rates).	increased requirements around compliance with health and safety and traffic management. Any change in the level of service would be at the discretion of the community board. Staff advise that their recommendation is to remove the Lions Park playground and have been working with the community board to effect this.
George and Sonia Smith	Wallace Takitimu CB - Concern voiced over the lack of progress for the camping ground at Holt Park, Otautau. Believes project has stalled, and the camping ground block has been destroyed and removed as it was believed to be an earthquake risk. Believes Otautau is being treated unfairly in this regard compared to Monkey Island, Thornbury or Waiau swing bridge.	Staff advise that the community is currently looking at options for the future of the camping ground at Holt park.
Pam Yorke, Waihopai ToeToe CB	Waihopai ToeToe CB - Curio Bay Overview – would like to work with Council to find best possible use of the reserve area that has recently been acquired. Requirements of the community, tourism, ecological values and iwi need to be considered.	Staff advise that there is a project in the LTP to review the Curio Bay Management Plan which will include the area that has been acquired as part of the subdivision as requested by the community board.
Sarah Greaney, Fiordland CB chair	Fiordland CB - Council needs to consider the $200K walkway realignment in Manapouri that has been put on hold as alternative options for the walkway are being investigated.	Staff advise that this has been included in the LTP.
Shirley Mouat	Fiordland CB - Opposes $200k Manapouri walkway realignment. Digging will cause erosion, if council deems unsafe, it should be closed.	Staff advise that this has been included in the LTP at the request of the community board.
Elaine Hamilton	SI/Rakiura CB - The roadsides have been neglected and need to be maintained. Keeping these areas well mown is a safety issue and provides a safe place for walkers and good visibility for vehicles as well as looking tidy.	That Council note the feedback and request the specific suggestion be passed on to the community board for its consideration. Staff advise that any change in the level of service would be at the discretion of the community board.
Community facilities – community centres and halls, offices and libraries, amenity buildings, toilets, dump stations		
District issues		
Andy & Pam Booth	We are concerned about the mention of a new council office building. Yes it would be very nice but isn't this is an unnecessary extravagance in these very insecure and unstable times?	That Council notes the submitter's feedback. No decisions have yet been made on the future arrangements for office space in Invercargill or elsewhere in the district. The current offices on Forth Street are a good example of another infrastructure deficit. Work at this facility has not kept pace with organisation and technology changes. Building services are subsequently at or near capacity and seismic performance does not meet code in some parts of the facility.
Chris and Viv Shaw	The infrastructure strategy has a number of items that are either inappropriate or simply too large to	

	be fundable in the current economic climate, including $10.5 million for new SDC offices. These offices should not be in Invercargill; rather they should be in Winton. Also they need to be set up simply such that SDC can perform its functions in as cheap a way as possible.	This funding is signalled further out in the LTP to align with the expiration of the temporary office leases in Invercargill. This will enable time for Council to consider the implications of current local government programmes of reform relating to RMA and three waters in particular and the impact this may have on office space requirements. Further work is also required to better understand the cost implications of updating the building services, and increasing the seismic rating of the offices on Forth St in Invercargill. No decisions have been made at this stage.
Katherine Morrow	Suggest Council staff should work from Council buildings in the District, to save the money spent on rent for Invercargill premises. Savings could then be used offset rates.	
Douglas Agnew/Jenny and Tony Tippet	I am not in favour of building a new Council building. The cost to ratepayers is not justified. There are buildings in the region that could be utilised rather than building yourselves a palace. If this causes a problem with those currently employed then I suggest they don't have our region at heart. A move to a region town or maybe two would open up some employment for local people. P-10656 Main Street Toilet Refurbishment $54055. The toilets are in reasonable condition and don't need refurbishment. Delete this project. Tourism Industry should pay for these toilets. Toilets: P-10657 Half Mile Playground Toilet. Not needed, do away with a toilet at the playground.	
Roderick Hall-Jones	Assets that have been built up over the years should now be used to fix very old infrastructure; after all, that is what they were bought for in the good times. Assets can be bought when the good times come again, selling them will also reduce council costs. Start with selling the Manapouri airport as it is costing a huge amount to keep and is not likely to make any money for the foreseeable future!	That Council note the submitter's feedback. The Te Anau Airport is identified as a strategic asset in Council's Significance and Engagement policy and the process to divest it would need to go through a special consultative procedure in line with a long-term plan or annual plan. This would require Council to pass a resolution that it wishes to begin this process.
Paula McKenzie	Be innovative and look outside the square to solve the problems of aging infrastructure. Why do we spend precious money on upgrading toilets and camping facilities that will continuously cost rate payers? It is literally putting hard earned money down the toilet. Start inviting people into our province who are willing to pay to help us protect it? Need to change how we operate post-Covid, and wants SDC to be the innovator. Instead of building $10M worth of offices, look at different	Council considers that providing infrastructure that improves both our resident and visitor experiences while adding to the districts amenity is important for both quality of lifestyle and the health of our local economy. No decisions have yet been made on the future arrangements for office space in Invercargill or elsewhere in the district. The current offices on Forth Street are a good example of another infrastructure deficit. Work at this facility has not kept pace with organisation and technology changes. Building services are subsequently at or near capacity and seismic performance does not meet code in some parts of the facility.

	ways of doing things - use the satellite offices more, work from home more, job share. Perhaps these are options that have already been looked at but why haven't we, as ratepayers, been told this.	This funding is signalled further out in the LTP to align with the expiration of the temporary office leases in Invercargill. This will enable time for Council to consider the implications of current local government programmes of reform relating to RMA and three waters in particular and the impact this may have on office space requirements. Further work is also required to better understand the cost implications of updating the building services, and increasing the seismic rating of the offices on Forth St in Invercargill. No decisions have been made at this stage.
Dianne Miller	Slope Point toilets - please prioritise this, disappointing absent from LTP project list and upgrading of Fortrose and Weirs Beach toilets needs to occur soon.	Staff advise that they are proposing to review the provision and location of the public conveniences that are currently provided throughout the district. The Fortrose toilet is scheduled for replacement in 2023/2024. There have been discussions with the community board about the future use of Weirs beach in terms of the high pressure it had been receiving pre Covid-19.
Arts Murihiku	While we are aware of the cost to Councils of installing, operating, and maintaining the infrastructure needed for our communities, we believe it is important that the social and cultural wellbeing's are recognised along with economic and environmental planning for strong communities and a better Southland.	That Council note the submitter's feedback. Staff advise that where possible art and culture is being used when projects are being delivered. This can be seen in the use of wraps on the new toilets that have been installed recently.
Local issues - toilets		
A James	Fiordland CB - Says that tour operators and using the free toilets by the Te Anau marina instead of taking passengers to the pay toilets by Lions Park. Rate paying locals then have dirty marina toilets/no paper.	That Council note the submitter's feedback. Staff advise that they have no ability to determine what facilities the public choose to use. They are all public toilets available to all users.
Shirley Mouat	Fiordland CB - Believes Council should sell lakefront toilets.	That Council note the submitter's feedback. Staff advise that the disposal of assets would require Council approval.
Chantel Marshall	Disagrees with 200k on new toilets for Tuatapere.	Tuatapere Te Waewae CB - That Council note the submitter's feedback. Staff advise that the new toilet at the playground on Halfmile road has been requested by the community board. They are looking towards the future with the potential increase in visitors to the town with the pending status change to the Hump Ridge Track.
Myles Greber	Believes that Tuatapere Main Road toilet refurbishment should take priority over a new toilet in Bennett Memorial Park; a sign in this park directing visitors to the Main Road toilets would save significant funds. Asks whether these funds could be used to offset other costs/maintenance of existing toilets i.e. if we give up this toilet can those funds be redirected elsewhere?	
Paula McKenzie	Tuatapere Te Waewae CB - Discusses proposed toilets for Tuatapere, understands that the last two attempts at providing toilet facilities there have resulted in vandalism and hence the facilities were	That Council note the submitter's concerns about vandalism as this has increased across the district. The investigation project is for an urban development plan for the main street. The community board requested this so that they could look at ways to rejuvenate the main street.

	removed. Suggests user pays toilets on Maint St as part of an urban development as an alternative. Requests information on $10,000 in the project schedule for Investigation Main St. What is being investigated?	
Paula McKenzie	Requests information on $10,000 in the project schedule for Investigation Main St. What is being investigated?	Tuatapere Te Waewae CB The investigation project is for an urban development plan for the main street. The community board requested this so that they could look at ways to rejuvenate the main street.
Douglas Agnew/Jenny and Tony Tippet	Does not support investigation of Main St., Tuatapere project or investigation project Railway Station.	
Katie Jones	Ardlussa CB - Opposes prices of toilets planned in the budget - in tiny Balfour $200K	That Council note the submitter's feedback. Staff advise that a new toilet is required in Balfour and the budget for replacement is commensurate with current market rates.
Carole Elder	Oraka Aparima CB - Discusses need for upgrades (more toilets, changing shed and parking area) in Riverton for visitors. It can be dangerous at times with so many people.	That Council note the feedback and request the specific suggestion be passed on to the CB and staff responsible for community facilities.
Pam Yorke, Waihopai ToeToe CB	Waihopai ToeToe CB - Believe that Weirs Beach and Slope Point need toilets added to the LTP, Slope Point for a toilet, and Weirs Beach for a replacement. In comparison to the Waikawa facilities and Fortrose, these are treated like the poor relation, yet have significantly more visits from visitors. Fortrose Foreshore Review – Believes this area will be facing many issues over the next few years, so it would be an ideal time, to get a good overview of the whole area. ie toilets, hall, water supply, foreshore erosion, localised flooding.	That Council note the submitter's feedback. Staff advise that they are proposing to review the provision and location of the public conveniences that are currently provided throughout the district. The Fortrose toilet is scheduled for replacement in 2023/2024. There have been discussions with the community board about the future use of Weirs beach in terms of the high pressure it had been receiving pre Covid-19. This site was seen as a local camping site and the current facilities were appropriate for this level of activity. That Council note the submitter's feedback. Staff advise that there is a project in the LTP to investigate the future development and issues at Fortrose as requested by the community board.
	Local issues - libraries	
Wendy Knowler	Oreti CB - Libraries should be to be open and functioning as not everyone has access to information such as internet. Believes temporary Winton library is not as central or user friendly as old.	That Council note the submitter's feedback. Staff acknowledge there were limited options available to relocate the service at the time of the closure. The priority was to ensure the safety of the public and staff due to the toxic mould. The library refurbishment project is currently on track to be delivered by the end of 2021.
Wynn Avery	Oreti CB - Question whether Winton needs a Rolls Royce library?	That Council note the submitter's feedback. The Winton Library and office refurbishment has been planned to create a safe and flexible community space within the current building footprint. Winton has traditionally been the most frequented library across the district and the community feedback to date signals this is the right direction to meet community needs.

Ann-Marie Humphries	Requests Te Anau area office be separate from library, with hours open to suit community.	Fiordland CB - That Council note the submitter's feedback. Staff advise there is not a current plan to combine the sites until a feasibility study is completed. Due to resourcing constraints, the feasibility study has been delayed so there will be no change to the current service being delivered.
Pat Killeen	Opposes amalgamation of the Te Anau office and library and understood there was to be a referendum before this decision was made.	
Tom Rouse and Sue Fuller	Opposes library space being shared with Council office.	
Pam Yorke, Waihopai ToeToe CB	Waihopai ToeToe CB - Community Hall upgrade needs to be looked into. Discusses that community originally told the Wyndham Library was temporarily relocated to the current premises. We believe it is time that there is something permanent done regarding this. Should process of looking into hall vs. library be revisited?	That Council note the submitter's feedback. Staff acknowledge the opportunity for the Wyndham hall and library to be reviewed and the scope and community consultation plan will need to progressed over the next 2-3 years to be budgeted in the 2024 - 2034 LTP.
	Local issues - halls	
Mary Napper	Wallace Takitimu CB - The Ohai Hall receives minimal use by the community which pay for it. Requests that this hall is rationalised and closed during the 2031 LTP. Does not think clubs using it should be getting the ratepayers support to cover the costs.	That Council note the feedback and request the specific suggestion be passed on to the community board for its consideration. Staff advise that any hall closure would be at the discretion of the community board but in consultation with the community.
Stephen Keach	Oreti CB - Understood that the Winton Drill Hall was now surplus to requirements, and should be sold. Retaining old, no longer much-used assets, is a drain on financial resources.	That Council note the feedback and request the specific suggestion be passed on to the community board for its consideration. Staff advise that any hall closure would be at the discretion of the community board but in consultation with the community.
Christopher Halder	Oreti CB - Does not believe that rates at Lochiel/Tussock Creek area are being used to help community projects like the community hall upkeep. States that response to request for funding for hall was that it had not been used for a long time and so funds allocated to another area.	That Council note the submitter's feedback. Staff advise that the rates that are collected for halls are spent on those halls. There is a project in the LTP for an external repaint of the Tussock Creek hall and additional funding has been allocated for general maintenance. The Lochiel hall is not a council owned hall. Council collects the rates and then distributes the money back to the committee managing the hall who then undertake the maintenance.
Ann Robbie	Oreti CB - Believes that community centres would be better off run by their local communities with guidance from council/boards. Disagrees that H&S training required for volunteers to clean/maintain hall. Says a business was willing to reroof centre at a good cost - but this was stifled as the council employees are concerned that there might be	That Council note the submitter's feedback. Staff advise that the Oreti CB are engaging with the groups that manage the halls within their community board area. There are options available for local groups to take over the management of their halls. While these assets are maintained by council, staff are required by council policy to engage approved contractors to undertake any work on the assets.

	'leakage' issues afterwards. Using this local business would save the council thousands.	
Maree Whiteley	Northern CB - Believes any funds spent on Five Rivers Hall need to be used to make it a "hireable" facility - eg a functioning kitchen etc before spending money on cosmetic things.	That Council note the submitter's feedback. Staff advise that they have had two onsite meetings with members of the Five Rivers community to discuss the future of the Five Rivers hall. This included discussions about their priorities for the work that needs to be undertaken at the hall.
Myles Greber	Tuatapere Te Waewae CB - Estimates for RSA flooring range from $17,000 to $40,000. Would like to know if this is a priority, or can it be left for a little longer without additional costs being incurred? It appears that all rated hall funds will be spent on this leaving nothing for urgent repairs/maintenance.	That Council note the submitter's feedback. Staff advise that the community board see the resurfacing of the RSA hall as a priority. Staff have aligned this work with other halls so that there can potentially be some savings by tendering all of the work as one package.
Community services – cemeteries, community housing, libraries		
Katie Jones	Oraka Aparima CB - Believes that $250,000 for land to extend the Riverton cemetery is excessive.	That Council note the submitter's feedback. Staff advise that the budget for the land acquisition for the extension of the Riverton cemetery is for an unknown size at this stage and is to cover all costs including land, legal, survey and resource consent.
Environmental services		
	District issues	
Paul Evans	Cut the RMA. Pull Rio Tinto into line and remove toxic waste, stop being held ransom by corporates	That Council note the submitter's feedback. Central government is reviewing the RMA and council intends to submit on the proposed new legislation. The aluminium smelter is located within the ICC jurisdictional area so SDC cannot influence their ability to operate.
Hamish McMurdo	The District should ban the burning and burying of waste on private properties.	That Council note the submitter's feedback. Burying waste is regulated by the Water and Land Plan administered by Environment Southland. There are rules which enable some waste disposal and discharge consents may be needed in certain circumstances.
Peter Goomes	There needs to be more ratepayers to share the burden. But rules regarding sub-division and building are increasing – they're unnecessary and restrict development. Limiting the amount of native bush that can be cleared to build. Bush regenerates quickly - people are constantly cutting back growth to retain sunshine and a view! The deer doing far more damage to the bush than the people, but they know they are safe because of restrictions on shooting near houses. I know that Government set rules that SDC must comply with, but they can be "advised" just as we are "advising" SDC.	That Council note the submitter's feedback. The RMA sets a framework where subdivision, land use and development is undertaken in a sustainable way. Further it acknowledges the value and important role our natural environment plays in sustain human life, enabling us to generate income from the land. Human influence has caused (and is still causing) the most significant loss of indigenous biodiversity across Southland and national regulations are changing. It is anticipated that more regulations will be imposed to maintain and enhance our natural environment including biodiversity.
Douglas Agnew/Jenny and Tony Tippet	Climate change should not be considered for rate purposes.	That Council note the submitter's feedback. The impacts of climate change are anticipated to be felt directly and indirectly across communities, regions and

		Aotearoa. Council infrastructure, hazard management, community resilience and carbon reduction are all matters which are going to be impacted by climate change. Council has a responsibility to prudently manage risks and position our communities to grasp opportunities and play our part.
Wendy Joy Baker	Dog control - Council is not applying all the rules of Section 5 of Dog Control Act 'Obligations of Dog Owners'. Council is not behaving fairly I feel, siding with dog owner/non rate payer.	That Council note the submitter's feedback. Staff advise that Council has animal control officers who perform functions/duties and exercise power imposed or conferred by the Dog Control Act 1996.
Christine Ellen Henderson	The climate emergency declaration requires individuals and councils to do what they can to sequester caution. Biodiversity protection advancement achieves many aims, not least the reduction of our carbon footprint, protection of our unique plants and animals, and adding attractiveness to our province. SNAs need to be sorted now, with assistance from our land-owners and carbon credits are awarded for their protection. Further delay is not an option.	That Council note the submitter's feedback. Staff advise that Council is working towards a climate action plan in order to take stock of where we are as an organisation and position ourselves to manage our changing environment moving forward. Council infrastructure, hazard management, community resilience and carbon reduction are all matters which are going to be impacted by climate change. Council is proposing to undertake the mapping and analysis of our Significant Natural Areas in this long term plan by setting up an ecology team, we are also looking to support biodiversity initiatives to enable land owners to make good management decisions in this space.
Ian Smith	Please look at the subdivision rules. I understand there needs to be top quality roading entrance ways to places where houses are going. However its counterproductive to put such stringent rules for entrance ways in place for most farmland boundary adjustment (ie look at the gateway usage, consider whether the gateway if sometime in the future (if a house was to be built) is suitable, if its usual distance for carriageways as far as building work - please let me know if I have not got the full picture).	That Council note the submitter's feedback. Staff advise that managing and upgrading vehicle accessways is commonplace when undertaking development or subdivision on land. Council has a Subdivision, Land Use and Development Bylaw 2012 that prescribes these vehicle accessway standards and this bylaw is up for review in 2022. Council need to ensure that accessways are safe and also don't undermine the integrity of the roading network. Striking the right balance of setting minimum standards and anticipated use of accessways does need some refinement when the bylaw is reviewed.
Amy McStay	Please check and amend "Regulatory Considerations" for example in supporting documents "Environmental Services 2021-2031 Activity Management Plan" pg 21 "Pouhere Taonga Act 2014" should read "Heritage New Zealand Pouhere Taonga Act 2014" (NHZPTA2014). I am concerned this shows an oversight in understanding how to plan for meeting compliance costs for the archaeological provisions of the NZPTA 2014 during asset management renewal & maintenance. I recommend SDC councillors contact HNZPT for further information on avoiding costs protecting	That Council note the feedback and request the specific update be passed on to the staff responsible for the Environmental Services AMP. SDC are aware of its requirements under the provisions of the NZPTA and as part of the LTP process, LTP projects are being identified that may require archaeological provisions and allowance has been made in project costs.

	archaeology and ensuring compliance with the archaeological provisions.	
Carole Elder	Have you thought about climate change with rising sea levels and tsunami risk. And how much is the maintenance each year for these areas and have you allowed for that.	That Council note the submitter's feedback. Council is in the process of develop a climate change action plan which will look at council's assets, carbon reduction, community resilience and management of natural hazards. Currently the Southland region is obtaining LiDAR which will accurately measure ground levels across the region so that hazard modelling and associated management work can be developed with communities and stakeholders.
Caldwell	Too much emphasis on earthquake standards of old buildings. Do they really have to be up to earthquake standard?	That Council note the submitter's feedback. The Building Act 2004 was amended in 2017 to reflect the government's plans to have all buildings within certain profile categories strengthened where appropriate by a certain time frame depending on their location. The Building Act 2004 sets out timeframes and processes for council and owners to follow to have certain buildings strengthened within certain timeframes. Council are complying with the requirements of the Building Act 2004 by consulting with the community on this topic and ensuring compliance of the standards by the due dates. The building team see this as an important part of keeping our communities safe.
Andy and Pam Booth	Freedom camping sites are too costly. Please leave it to the privately owned camping grounds where there are toilets and washing facilities.	That Council note the feedback and request the specific comment be passed on to staff responsible for freedom camping for inclusion in the review of the Freedom Camping Bylaw. The next review of the Freedom Camping Bylaw is in 2025, and that is the appropriate time to review the District freedom camping rules. Council may consider an earlier review date in light of the Government's current review of freedom camping regulation.
Noeline & James Evans	Building permits in SDC - Price paid for permit. These include visits to sight by building inspector to supervise work progress. Why then is a fee payable to council for Code Compliance certification. If building inspectors doing job they are paid to do why the drawn-out process to get Code Compliance as this takes months and sometimes years to get. Improvement needed now.	That Council note the submitter's feedback. Council agree that obtaining a Code Compliance Certificate should not be a long, drawn out process and are working towards improvements in this area. While the building consent cost includes the minimum number of inspections required for the build, not all builds go to plan. The building team at Council are 'not for profit' and need to on-charge the cost of repeat inspections and time taken to work with owners/builders to ensure that all requirements of the Building Act 2004 and Building Code are complied with, including the collation of supporting documentation after a build, before a Code Compliance Certificate can be issued.
Brian Church	Outstanding Natural Landscape Zoning - It has come to my notice today that certain areas throughout New Zealand are being rezoned under government direction by councils with no consultation with the affected landowners. Don't let this happen in our District. Remember your mission.	That Council note the submitter's feedback. The RMA requires Councils to identify and manage matters of national importance such as landscapes and biodiversity (section 6 (b) and (c)). Council is currently undertaking a review of the "Landscapes" chapter of the Operative District Plan 2018 in order to ensure that we are compliant with legislation and we are also protecting the landscape jewels in the Southland Crown. Changes will not be made without landowner engagement and we encourage land owners and the community to be part of this process.
SD Payne	Concerns about the fear the government is causing about global warming and climate change.	That Council note the submitter's feedback. Research indicates that our climate is changing which will have either direct or indirect implications for our district.

		Legislation is in place to set carbon targets which will change how we undertake our work. Councils across New Zealand are therefore required to implement this across many facets of our responsibilities including resource management, building, three waters, waste etc. Council will be working with the Climate Change Commission on a number of key aspects as their roadmap to achieving this goal is revealed, and working to prepare our communities to take advantage of any opportunities.
Carla Kupe	Pest control – issues with possums. I know it's tricky with so many pet cats. There must be a solution. I was told to ring ES then back to SDC. Then advised to talk to neighbours, get a gun. Really!! I don't think so I thought - I'd have the police knocking at the door I'm sure.	That Council note the submitter's feedback. Staff advise that possums are managed by Environment Southland.
Brain Mason	Worried that the public is being panicked by people who have no knowledge of what is happening to our climate. "Climate Change" has been occurring for millions of years. By saying you anticipate sea level rise, erosion of land and infrastructure, temperature increases, loss of drinking water, increased rainfall, flooding and drought, you are creating a scenario of total chaos. I would like to think that if you quote and use reputable scientific reports to justify your decisions, the public would work with your organisation to obtain the maximum benefit.	That Council note the submitter's feedback. In 2018 the four Southland councils commissioned NIWA to undertake a climate impact assessment for the region. The 138 page report outlined a number of anticipated impacts over various RCP models out to 2040 and 2090. This outlined anticipated changes in southland's climate. The full report is available here: https://www.es.govt.nz/repository/libraries/id:26gi9ayo517q9stt81sd/hierarchy/environment/science/science-reports/science-reports-september-2018/Report%20-%20Southland%20climate%20change%20impact%20assessment%20-%20August%202018.pdf
Sandra Cooper	Dairy farming has wrecked the waterways in many places - addressing issues in this sector would reduce the amount of money spent on waste/sewage/waterways etc.	That Council note the submitter's feedback. The government has announced reform of the RMA which is going to have a significant impact on our use and management of natural resources. Some good work is already occurring within the catchments and various sectors. We all have a role to play in improving our natural environment and the new direction from the government and investment will help improve our situation.
Darelle Jenkins	General comments about Council activities at a national level - focused on number of aspects including local alcohol policies and responsible camping.	That Council note the submitter's feedback. LAPs - Council does not have a LAP that has rules that are beyond its authority. Responsible camping - The next review of the Freedom Camping Bylaw is in 2025, and that is the appropriate time to review the District freedom camping rules. Council may consider an earlier review date in light of the Government's current review of freedom camping regulation.
Sheila Watson – Heritage New Zealand	Heritage New Zealand recommends the following to protect and enhance the historic heritage of Southland District: - consultation is undertaken between Southland District Council and Heritage New Zealand for infrastructure development and priority projects	That Council note the submitter's feedback. Climate change impacts on cultural sites are well known. Council previously supported the Southland Coastal Heritage Inventory Project (SCHIP) which undertook coastal monitoring of archaeological sites as costal erosion was being observed. Currently this project has been put on hold due to funding and changes in key staff driving the project. If there is a

	that may affect places or areas entered on the New Zealand Heritage List - Council is aware that archaeological authorities may be required for certain projects outlined in the Long Term Plan so that any costs and time associated with this are anticipated and included in project budgets. Archaeological Authorities are sought from Heritage New Zealand for any works that may modify or destroy an archaeological site as is required under the Heritage New Zealand Pouhere Taonga Act 2014. - Council recognises the adverse effects of climate change on Maori heritage and implements measures to prevent further degradation wherever possible. - Council considers establishing non-regulatory heritage incentives such as a districtwide contestable fund or targeted area fund to facilitate the seismic strengthening of heritage buildings in Southland District.	willingness across the agencies to continue this work, Council should be at the table progressing this work. Council is in the process of working with heritage building owners as part of the earthquake prone buildings process. Council has secured funding for some buildings within the district and setting up a contestable fund would provide more stimulus to achieving good heritage and safety outcome for building owners and the community. SDC are aware of its requirements under the provisions of the NZPTA and as part of the LTP process, LTP projects are being identified that may require archaeological provisions and allowance has been made in project costs.
AD Wilson	NPS for Biodiversity - Try to do this without building in more bureaucracy. Engage and achieve by working with the community and encourage and facilitate biodiversity improvements. Landscapes - Consider govt objectives, seek diverse outcomes, consider and engage all sectors and if you are going to wield the big stick, look backward as well as forward. Climate change and natural hazard management - effects not restricted to sea level rise. Temperature increase and weather events will have significant effects on road and bridge infrastructure as well as drainage. Does our current state reflect we have known about this for 20 years or does it appear we are like the rest of NZ and exposed by a lack of action? Building Act - Council should facilitate housing growth due to housing demand and supply issues and avoid lengthy delays on the completion of projects. Exercise the required sensibilities or lobby for change of the Act.	That Council note the submitter's feedback. The National Policy Statement for Indigenous Biodiversity (NPS-IB) is going to legislate the mapping of Significant Natural Areas across the District. Council is looking to partner with other agencies and seek to undertake this large body of work in an effective and efficient way while bringing the public with us. Landscapes, Council has agreed to commencing a review of the "Landscapes" section of the Operative Southland District Plan 2018. Work is underway to identify significant and important landscapes in accordance with the community, iwi and national practice. This work will be tested and developed with our community in mind. In 2018 the four Southland Councils commissioned NIWA to undertake a climate impact assessment for the region. The 138 page report outlined a number of anticipated impacts over various RCP models out to 2040 and 2090. This outlined anticipated changes in southland's climate. The full report is available here: https://www.es.govt.nz/repository/libraries/id:26gi9ayo517q9stt81sd/hierarchy/environment/science/science-reports/science-reports-september-2018/Report%20-%20Southland%20climate%20change%20impact%20assessment%20-%20August%202018.pdf In this LTP Council are seeking to better understand the impacts that climate change will have on our community and also the impact it will have on Council's assets and liabilities. Council is seeking to prepare a climate action plan which will help transition the organisation and communities into a more proactive space on this issue.

		Council acknowledges the comment about the Building Act. Council have been proactive in the climate change space with an internal project underway regarding building on land susceptible to natural hazards. Sea level rise, global warming and other key items are all considerations by Council that are not referenced in the Building Act 2004
Catherine Hill	Why is climate change included in LTP. Colac Bay and Orepuki erosion is due to ocean currents. Protection work already provided is important and should be extended so the foreshore can be protected. I trust the warming hoax will not lead to rates being spent on electric cars which take a lot of fossil fuels to build. The issues promoted by climate change have been occurring for years and will continue to occur into the future.	That Council note the submitter's feedback. Climate change will have impacts on our coastlines and consequently private and council managed assets. Council is looking to make strategic decisions about protection structures in line with current national practice. In many situations (St Clair esplanade in Dunedin for example) "protecting" assets such as roads and buildings from erosion has actually lead to a perverse outcomes for the very thing (the sandy beach) which attracted people to that location in the first instance. Council is conscious that our Southland beaches (including Colac Bay and Orepuki) are some of the wildest, natural and beautiful beaches in New Zealand and maintaining the important parts of our beaches needs to continue being a priority.
Dianne Miller	Support Freedom Camping Ranger role and advocating to central govt for funding to continue.	That Council note the submitter's feedback. Council will give feedback to the Government as part of its submission on sustainable freedom camping review. Council will consider this submission at its meeting on 5 May 2021.
Matt Ammunson-Fyall	Environmental Management - through LTPs Councils need to recognise the environmental assets of the region are critical to tourism success and to make a commitment to maintaining, enhancing and restoring those assets	That Council note the submitter's feedback. Southland is spoilt for significant natural character and outstanding places and spaces. The reform of the RMA and therefore renewed emphasis of improving our natural environment from degradation is a priority for this government. Council understands that we need to do more in this space to meet legislation and continue being an attractive place to live and visit. Investment is proposed to map areas of significant indigenous vegetation and map our outstanding landscapes so that we can protect what is important for our future generations.
Jaspreet Boparai	Significant natural areas - 1.7 million Ha land, costed as $9 million to $18 million (on newspaper) has not been discussed with community - need more details of cost-benefit analysis.	That Council note the submitter's feedback. Changes in legislation being the proposed National Policy Statement for Indigenous Biodiversity (NPS-IB) is making it compulsory that Council map the District's Significant Natural Areas. This piece of work has not yet been done since the RMA came into force. Council has submitted on the proposed NPS-IB seeking that funding be provided due to Southland being disproportionately affected (small rate payer base and large geographical area). Council needs to being this work or risk being legislatively non-compliant.
Ronald Henry Baxter	Mapping of significant natural areas not discussed by the community and varying costs between 9/18 million quoted.	
	Local issues	
Rebecca	Fiordland CB - Requests eradication of Canadian geese on the shores of Lake Te Anau.	That Council note the submitter's feedback. Staff advise that DOC is currently leading an initiative to address this problem, working with a local association set up for this purpose. Council has resolved to provide some funding to the project, but that it does not have jurisdiction for this issue.
Greg & Liz Weake	Oraka Aparima CB - Concerned about the number of people who ignore the signs and have dogs off the leash in the Taramea playground.	That Council not the submitter's feedback. Staff advise that this area is regularly patrolled. This feedback has been forwarded to Council's dog control team.

Nigel Humphries, Accommodation Association Fiordland	Fiordland CB - Short-term Rental Accommodation (STRA) – see submission for detailed points, requests Council to consider increasing regulation on STRA in Fiordland, in order to level the playing field with other accommodation providers, and provide long term rental accommodation for the area. Requests Council enforce current regulations like they are doing with the spa pools/ where a compliance officer is tracking them down and making sure owners know the rules and comply with the legal requirements.	That Council note the submitter's feedback and request the specific comment be passed on to staff responsible for STRA. Council is aware of the issues around short term rental accommodation and are looking at options around this issue. Staff are interested in having further conversations with accommodation providers. Council agree that the monitoring and enforcement around STRA use of buildings should be stepped up to ensure the safety of the community. While this is an important part of the Council function, the new Building Compliance team will look to take the same approach with STRA as they have done with pool safety and educate the community before they monitor and enforce on this topic.
Ben Killeen	Fiordland CB - Believes Te Anau is in desperate need for more commercial sub-divisions. Council needs to push this idea forward	That Council note the submitter's feedback and request the specific comment be passed on to planning staff and the community board. Urban development capacity is one of the matters we need to look at when reviewing the District Plan. Unfortunately, we are still some time out (possibly 3-4 years) from commencing this piece of work as there are a number of other legislated changes that need to be made to the District Plan which take priority. In the meantime however, the Planning team can work with the Community Board to work through some suggestions on what is driving the growth now, and likely to drive it in the future and what outcomes the Board and community are seeking. Work in the background could commence on this process could start in the near future which could bring this body of work forward.
Stu McKnight	Discusses that the Athol population is growing and therefore there is pressure on housing. There is land available but needs to re-zoned as urban settlement. Please see attachment as this particular piece of land would be ideal. The growing Athol population cannot wait for the next District plan in 8 years, housing is needed now. In addition to this the outskirts of Athol also need to be rezoned as residential.	Northern CB - That Council note these submitters feedback. Athol has seen a large amount of growth of the last two to three years with subdivision, and new dwellings being built. More growth is likely in Athol and some more strategic work is needed to identify some risks and options for moving forward. Currently the township is not reticulated with water or wastewater and accordingly intensification of onsite wastewater systems for each dwelling is likely to have adverse effects on existing potable water bores and groundwater. If additional land is zoned for urban development Council (including the Board) need to be sure that this growth is occurring in a sustainable way and therefore need to consider if or when a wider reticulated network may be required to support the growth and how any system should be funded. Additionally there is some natural hazard management that needs to be considered with the Mataura River and Eyre Creek which should drive decisions about how future growth should occur.
Liz Macklan	Believes that Athol has a growing population and limited room for development, it needs to be rezoned as residential.	
Rebecca Price	Discusses that the population of Athol has grown rapidly in the last 5 years, with people commuting to Queenstown to work. There is land available that should be rezoned as urban settlement so that there can be more available sections. This needs to happen in the next 12 to 18 months, because waiting until 2031, or even 2025, is not an option.	

Lyn Turner	Suggests that more residential land is required in Athol due to a growing population.	
Pamela McKnight	Discusses that the population of Athol has grown rapidly in the last 5 years, with people commuting to Queenstown to work. There is land available that should be rezoned as urban settlement so that there can be more available sections. This needs to happen in the next 12 to 18 months, because waiting until 2031, or even 2025, is not an option.	
Maddie Macklan	Suggests that more residential land is required in Athol due to a growing population.	
Transport activity – footpaths and cycle trails		
Ann Pullen	SI/Rakiura CB - Opposes more footpaths on the Horseshoe Bay Road. Requests keeping the walking tracks maintained by the SDC in good order before making any new ones. Get rid of any old structures (Bathing Beach Area) and signpost the new tracks (bathing beach area) Although I am not opposed to new ones, just look after the others first	That Council note the submitter's feedback.
Stephen Hoskin	Fiordland CB - Please see attached letter the Te Anau Board sent to the Te Anau Community Board in September 2019 regarding the safety of a footpath close to the school. Have been informed that the problem is Council's responsibility, not NZTA, since it is the footpath that needs changing, not the highway. We have not heard anything since. Requests Council to address this issue specifically and please write to our Board advising us the outcome of Council's analysis, prioritizing and time frame for any work. Additionally, we encourage Council to develop safe active transport for Te Anau (and other Southland Towns) and include specific goals in its Long Term Plan.	That Council note the submitter's feedback. Footpaths are a locally funded activity. This has been raised and agreed with the Fiordland CB as a project for 2021/22.
Ian Munro	SI/Rakiura CB - Believes that PGF funding deadlines missed for footpath to Golden Bay, and that roads and roadsides have deteriorated on the island.	That Council note the submitter's feedback. If there are specific roads or sections of road of concern it would be useful to know as these can be investigated and works appropriately programmed. Staff advise that no deadline was missed for the PGF, as no application was drafted or submitted for this item.
Peter Johnstone	Waihopai Toetoe CB - Requests to know where scrap goes from footpath renewals? In Wyndham a strip between Alma St and the golf course is ruined by the dumping of concrete scraps.	That Council note the submitter's feedback. Appropriate disposal of concrete forms part of the contract works.

Margaret McKelvie	Waihopai Toetoe CB - An SDC consultation meeting in Edendale 18 months ago identified a cycle/walkway between Edendale and Wyndham. Since then the road between Edendale and Wyndham has been altered/fixed about 3 or 4 times but now mention or consideration for a cycle/walkway.	That Council note the submitter's feedback. The renewal of the road was a separate project. The remedial works required was carried out through the warranty period of the contract and to no cost to rate payers.
Pam Yorke, Waihopai ToeToe CB	Waihopai ToeToe CB - Edendale/Wyndham walkway has been discussed by CBs for some years. This came about as residents and students from the college, are asking for a safe option to move between the two towns. This road has a significant amount of heavy vehicle movements on it, and an option for a walkway/cycleway, we believe would be very well received by our community.	That Council note the submitter's feedback. Staff advise that this would be at the discretion of the community board as this would be a locally funded activity.
Beverley Osborn	SI/Rakiura CB - Does not support the new footpath between the top of the Ferndale hill and the first Mill Creek bridge does not fit well into its environment and the thought of further environmental defacement stretching on and on towards Horseshoe Bay is chilling. Understands there has been a cut to money previously spent on keeping road verges mowed and tidy. If that money was re-instated, a line painted on one side of the road and signage erected, directing pedestrians to use the verge, would not this be a more cost effective and environmentally more attractive way of indicating a safety zone on most of our roads? Believes it would also be useful to revisit the terms for the expenditure of SIVL and that tracks in Baker Park and footpaths on Dundee Street might then qualify.	That Council note the submitter's feedback and request the specific comment be passed on to staff leading the review of the SIVL bylaw and policy and the community board. Staff advise that review of the SIVL bylaw and policy is underway.
Elaine Hamilton	SI/Rakiura CB - Concerned about additional expenditure on the Baker Park and Horseshoe Bay walking tracks at this time. Also concerned about the number of cars on the Island.	That Council note the submitter's feedback. Local funded activity scopes of work and priorities are approved by respective Community Boards. Staff advise that currently there is no legal mechanism to limit the number of vehicles.
Shirley Mouat	Northern CB - Believes Council should sell the Around the Mountain Cycle Trail due to burden on ratepayers.	That Council note the submitter's feedback. Staff advise that the Around the Mountain Cycle Trail is categorised as a strategic asset. Rationalisation of this asset would require specific consultation with the district through the annual or long term plan process.
Transport activity – Te Anau Airport Manapouri		

Peter Zessin	Fiordland CB - Believes that the Te Anau Community should not be funding the runway surface renewal for the airport and the asset should be sold or funded on a user pays basis.	That Council note the submitter's feedback. Staff advise that the airport is categorised as a strategic asset. Rationalisation of this asset would require specific consultation with the district through the annual or long term plan process.
Chris and Viv Shaw	The infrastructure strategy has a number of items that are either inappropriate or simply too large to be fundable in the current economic climate, including $1.4 million over two years on resurfacing the runway at Te Anau Airport Manapouri. This whole project has been a poor earner for the local population. It needs to be sold off to a private organisation as a General Aviation field as soon as possible. If it is ever able to generate income from tourists then let a private organisation benefit.	
Shirley Mouat	Believes Council should sell Te Anau Airport, due to burden on ratepayers.	
Mrs M H Snoep	Fiordland CB - Believes that the Te Anau airport is a national asset, and needs national funding not from small ratepayer source.	That Council note the submitter's feedback. Staff advise that the airport was acquired at the request of the local community, with the strategic value of this asset primarily in the Fiordland area. Airports are not funded at a central government level.
Doug Ramsay	Fiordland CB - Requests the net income from Te Anau Manapouri airport as I note ratepayers are up for 1.3 million to reseal the runway.	That Council note the submitter's feedback. Information has been provided to submitter under separate cover. Details are contained in Fiordland Community Board Agenda item 7.1 of 28.10.2020 – available online via Meeting schedule and agendas on Council website.
Sarah Greaney, Fiordland CB chair	Fiordland CB - Discussions on whether the airport should be a District asset have not yet been resolved, meaning the burden of the runway surface renewal may not be totally incumbent on the Fiordland ratepayer to fund. Appropriate discussions regarding this would have a much lower impact on rates, the outcome of which should be reflected to our community ratepayers.	That Council note the submitter's feedback and request the specific comment be passed on to relevant staff. Staff advise they would like to continue discussions with the CB on this matter.
SIESA		
Fiona Black, Real Journeys	With respect to power generation on Rakiura we would urge the council to investigate "offshore" wind turbines as constructed for the UK Rampion Offshore Wind Project.	That Council note the submitter's feedback. Staff advise that the Rampion Offshore Wind Farm is a £1.3 billion project with 400 MW total capacity comprised of 116 3.45 MW turbines. SIESA's capacity is in the order of 0.5 MW.
Ian Munro	Regarding SIESA, believes that Powernet's overheads are excessive and that Council engineers are making poor decision. Would like to see SIESA run by a business with better customer care.	That Council note the submitter's feedback. Staff advise that following a Registration of Interest to identify wider market interest, a contract with Powernet's contract was negotiated in 2020 under revised terms and conditions. Require specific detail of poor decisions in order to respond.

	Would like to see SIESA's management of waste collection overhauled.	
WF Doherty	The administrative costs since Powernet took over the Stewart Island power seem to be excessive.	That Council note the submitter's feedback. Staff advise that following a Registration of Interest to identify wider market interest, a contract with Powernet's contract was negotiated in 2020 under revised terms and conditions.
Jon Spraggon, SI/Rakiura CB chair	Support the proposed changes to the SIESA funding. Although the board is aware that this is a substantial increase for the ratepayers, they consider it vital to have a more secure funding source for SIESA maintenance and sustainability in the longer term. As investigations into alternative energy sources have stalled, the progression of renewals and consistent maintenance of SIESA is of some urgency.	That Council note the submitter's feedback. Staff advise that under the revised Powernet contract, maintenance and renewals will be scoped, authorised and delivered as annual programmes of work.
Water facilities (jetties, boat ramps, navigation, pontoon, retaining wall, viewing platform)		
Fiona Black, Real Journeys	SI/Rakiura CB - Supports the proposed replacement of the Ulva Island Jetty and the Golden Bay Wharf.	That Council note the submitter's feedback. Staff note the support for these projects.
Ian Munro	SI/Rakiura CB - Believes there has been too much delay regarding management of jetties and funds not used effectively.	That Council note the submitter's feedback. Staff advise that there have been issues that have had to be worked through before work can start on the replacement of the wharves. These include but are not limited to, ownership, resource consent, management agreements, funding, design scope and affordability.
WF Doherty	SI/Rakiura CB - There appears to be a great deal of money spent on consultants and engineers regarding wharves at Stewart Island where some local knowledge could have averted this and at least got some more progress.	That Council note the submitter's feedback. Staff advise that they have engaged with the community throughout the development of the plans for the renewal of the Ulva Island and Golden Bay wharves.
Chris and Viv Shaw	SI/Rakiura CB - The infrastructure strategy has a number of items that are either inappropriate or simply too large to be fundable in the current economic climate, including $1.4 million for a new wharf on Stewart Island at Golden Bay. This is the perfect candidate for being paid out of the SIVL with an appropriate loan to smooth cashflow if necessary.	That Council note the submitter's feedback. Staff advise that they have been working with the community board to look at alternative options for funding these projects. Applying to the SIVL is one of the options available.
Sarah Greaney, Fiordland CB chair	Fiordland CB - Funding decisions for the Manapouri/Pearl Harbour ramps and gabion baskets require discussion with key users to determine whether there are any existing agreements in place for co-funding repairs to infrastructure. Appropriate discussions regarding this would have a much lower impact on rates, the	That Council note the submitter's feedback. Staff advise that all options for co-funding will be investigated prior to any work being started.

	outcome of which should be reflected to our community ratepayers.	
Shirley Mouat	Manapouri boat ramps $320k, queries whether his could be funded by Meridian. Requests to know whether Manapouri boat ramps, gabion basket replacement $400k should this not all be shared funding by SDC, ES and DOC?	
Douglas Agnew/Jenny and Tony Tippet	Tuatapere Te Waewae CB - Does not support Tuatapere Boat Ramp refurbishment, suggest making it user pay and commercial businesses use it.	That Council note the submitter's feedback. Staff advise that if the boat ramp maintenance is not undertaken it will result in higher maintenance costs in the future.
Waste Services		
	District issues	
Hamish McMurdo	I would like the council to ensure that it actively supports and continues to improve the districts recycling services with Southland Disability Enterprises Ltd. For environmental benefit and the social responsibility benefit for our region. The district should be planning a transfer station to enable appropriate waste disposal.	That Council note the submitter's feedback. Staff advise that the existing levels of service associated with both waste and recycling services are planned to continue through the LTP period. However, it is noted that the global recycling markets and national regulatory standards associated with recycling and waste services may be subject to changes that necessitate a revisit of these services at some point.
Douglas Agnew/Jenny and Tony Tippet	Remove the yellow bins as we have a recycle centre already established.	That Council note the submitter's feedback. Staff advise that the service is provided to ratepayers across the district, as there is a limited number of recycling facilities. These facilities are at maximum capacity.
Larina Harris	Just that the submission for the Winton dump to take unlimited waste will do absolutely no good for our clean green district and I can't even believe it's being considered in this day and age with regards to waste	That Council note the submitter's feedback. Staff advise that this is an AB Lime consent application issue.
Diane Andrews	Landfill at Kings Bend - It is of particular importance to me that the SDC actively opposes the decision to increase the use of the Landfill at Kings Bend to incorporate more waste from outside of our area. I currently I have confidence that Council will make decisions that will benefit Southland. Not to oppose the increased landfill would make a mockery of any decisions based around decreasing carbon emissions (by encouraging even more trucks on the road).	
Imelda Sutherland	Green Waste - Same as my 2014 submission only nothing has happened in 7 years *(2014 submission stated Tuatapere needs a green waste drop-off area).*	That Council note the feedback and request the specific suggestion be passed on to the community board for its consideration. Staff advise that introducing this service into the Tuatapere community is a CB issue requiring community consultation, appropriate disposal site options and a funding mechanism. Staff encourages further discussion with the CB to determine wider community appetite.

Katie Jones	Scrap the plan to change rubbish bins, only budget for replacement of broken ones. There is a lot of money budgeted for painting and new signage at the waste centres.	That Council note the submitter's feedback. Staff advise that signage changes are to keep up with regulatory site management requirements.
Henderson Brian McArthur	The disgusting smell from Kings Bend, all the asbestos from Christchurch, their rubbish, sewerage from all the towns contaminates dumped on Southland, they should be paying for us, they have a braze neck, aren't they green people up there.	That Council note the submitter's feedback. Staff advise that this is an AB Lime issue where monitoring is required and carried out by consenting authorities, or their representatives
Katie Jones	Believes that household rubbish can be charged by the trailer load.	That Council note the submitter's feedback. Staff advise that trailer load disposal is available in addition to the level of service provided by the wheelie bin service.
Local issues		
Greg & Liz Weake	Oraka Aparima CB - The green waste/dump and recycling depot is marvellous.	That Council note the submitter's feedback.
Carole Elder	Oraka Aparima CB - Requests landfill at Colac Bay addressed to avoid a major environmental disaster in Colac Bay, Tihaka, Riverton and Oreti beach sea beds. Also could get into the oyster beds.	That Council note the submitter's feedback. Staff advise that whilst this retired landfill is on private land, SDC have set aside funding in year three of the LTP to investigate this and other retired landfills across the district.
Ian Munro	SI/Rakiura CB - Would like to see SIESA's management of waste collection overhauled.	That Council note the submitter's feedback. Council is always looking to improve services, and this was a topic of discussion at the November 2020 community board meeting. There are a number of improvements that have been implemented in recent years.
Pam Yorke, Waihopai ToeToe CB	Waihopai ToeToe CB - Wyndale Transfer Station – request that ability to have a recycle container in the fence line be investigated. We are repeatedly asked by our rural residence for the option of being able to get rid of recyclable products when the transfer station is closed. We need to be able to give our rural ratepayers a better option than what they have now, allowing for the fact they are paying a rubbish charge, but don't have the ability to get any cost benefit from this.	That Council note the feedback and request the specific suggestion be passed on to waste services staff and the community board for its consideration. Staff advise that Council could look at providing a recycling container at this location in the future, dependant on funding and community demand.
Katie Jones	Fiordland CB - Requests to know why Te Anau needs a weigh-bridge at $154,000	That Council note the submitter's feedback. Staff advise that the weigh bridge is a legislative requirement. A weigh bridge is necessary to report on annual waste tonnage over a specific threshold, which Te Anau meets. The cost is noted in the LTP at $80,000.
Three waters		
District issues		
Paul Evans	Reduce costs on sewerage. Stop double standards for communities. Winton and Te Anau sewerage are	That Council note these submitter's comments. Staff advise that aging infrastructure coupled with changing regulatory and legislative standards are having a significant

	totally different but costs are ridiculous for one and not the other.	impact on the costs associated with operating and maintaining the three waters networks across the district. To date, other than reticulation renewals, councils approach has been to limit significant expenditure on scheme renewals until consenting renewal processes fall due in a bid to spread the cost burden appropriately. In addition to the challenge of aging infrastructure and increasing regulatory standards, central government have proposed to reform local government three waters service delivery. Central government is proposing to establish a new national water regulator, Taumata Arowai, and to create a number of multi-regional entities that would manage the delivery of three waters services, removing this function from territorial authorities. Last year Southland District Council signed a memorandum of understanding with the Crown committing Council to engaging in discussions with central government about the proposed reforms. That commitment meant Southland District Council was granted $13.53 million in stimulus funding, which has allowed it to embark on a significant programme of renewals and upgrades of water networks throughout the district, reducing the burden on ratepayers. SDC is working closely with local government partners across Otago and Southland to better understand the central government proposal and look to the future of service delivery opportunities and efficiencies. Council has 11 potable water supplies, 13 rural or stock water supplies, 22 stormwater networks and 19 wastewater networks, which could all be managed by another entity in future. If Council opts to support the proposed reforms, it is anticipated that from a community perspective there should be no significant change to level of service. The most significant area of focus is ensuring equitable access to services. Ensuring the voice of smaller, rural communities isn't lost in the larger entities alongside the larger, more populous urban areas is a priority. More detail on central government's proposals is expected soon and a public campaign about the proposals is scheduled for later this year.
Terry MacNamara	The Monowai Village services society formed after the sale of houses, to new owners. This was to ensure the village had a quality water scheme owned by the society, which has been well managed. I would not be in favour of this scheme being compromised by the LTP especially since no SDC funds were contributed to it.	
Douglas Agnew/Jenny and Tony Tippet	Sewerage: P-10481 Consent Renewal Preparation$20000 and then $214298 seems very high, this needs to be reviewed.	
Mrs M H Snoep	Long Term Plan has glaring omissions - Main water supply scheme serving Te Anau and Manapouri, very costly and not mentioned.	
Sarah Thoene	I think it is important to keep the momentum up with working towards the Three Waters reform, as good water quality is an incredibly important issue for Southlanders and New Zealanders.	
Allan Baird	I am not inspired by the prospects of 3 waters reform & a likely removal of this work from the Southern Councils. Every region has competing priorities for investment, I am concerned a centralised entity, solely focused on water will over compete for scarce community resources. Leaving little money for roading & bridges. Don't be lured by the prospects of someone else's money fixing Southland's problems. There is no free lunch. All the debt incurred by these entities will need to be serviced & repaid over time. Southland is a prosperous region, it will likely be rated to fix other regions under investment in water services. Work with the other Southland TA's & find a solution that will be good for our region, not those to our north.	
SD Payne	NZ has the cleanest water compared to other food producing countries.	
Chris and Viv Shaw	Three Waters reform - given the lack of trust in the effectiveness of local territorial authorities in this area, post-Havelock North, it is likely that proposed changes could be quite radical, with assets changing hands and extra support being available with funds	

	potentially also coming from central government to support rates.	
Leanne Liggett	The Three Waters Reform Programme is acknowledged to be in its early stages operationally within Southland and Public Health will continue to support council and monitor any issues that are reported. Not all SDC supplies are protozoa compliant (Eastern Bush/Otahu Flat, Ohai/Nightcaps). Eight of 11 registered water supplies have expired Water Safety Plans requiring attention (Riverton, Tuatapere, Otautau, Winton, Mossburn, Ohai/Nightcaps, Eastern Bush/Otahu Flat). We continue to support community water fluoridation as an important public health measure in the maintenance of oral health and prevention of tooth decay. This needs to be a consideration for the larger water supplies in the Southland District. Engagement on how to use and maintain wastewater disposal systems that are non-reticulated.	
Bryan Barnes	Three waters - what are the future plans for small towns in SDC re three waters?	
	Local issues	
Noel and Margaret Curtin	Wallace Takitimu CB - Discusses is a stormwater drain running through 3 and 5 Leithen Street, Nightcaps. Grill at the end of this open ditch gets blocked by leaves resulting in flooding that flows south down Leithen St. Believes a portion of the playground funding would resolve this issue	That Council note the submitter's comment. Staff advise that stormwater is proposed as a district funded activity through the next LTP period. Council encourages these sorts of issues be lodged in the RFS system to ensure staff become aware of the problem and work with the maintenance contractor to resolve. Staff will contact submitter directly as to whether an RFS is appropriate.
Myles Greber	Tuatapere Te Waewae CB - Requests a review of the proposed stormwater full charge to be considered for change to quarter charge, and the property does not benefit from the Tuatapere Stormwater system.	That Council note the submitter's comment. Staff advise that the benefit being provided is to the general area not specifically linked to individual properties.
Pam Yorke, Waihopai ToeToe CB	Waihopai ToeToe CB- Believes that households of Curio Bay should get the benefit of the local wastewater treatment plant. Especially now that the sub division has connected to this, it should be a fair and level playing field for all residents.	That Council note the submitter's comment. Council agrees that this is the longer term plan for this asset. However, there are a number of steps that need to occur before this can be achieved. This includes installation of a pipeline along the road to allow the properties to connect in and an additional block of filtration membranes at the plant to enable the additional volumes to be processed. This would have to be funded by all the applicable Curio Bay rate payers. Each ratepayer wanting to connect would then have to, at their own cost, install an

		onsite wastewater pump station and then they would also be rated each year for the district sewer rate.
Community leadership		
Peter Goomes	The SDC should be encouraging people to set up businesses here as especially in the last year visitor accommodation has been hard to find, dining out very restricted and booked way ahead.	That Council note the submitter's comment. Great South as Southland's regional development agency is actively working in the space. In addition, Coin South provides advice and connection to funding for entrepreneurs looking to start up new businesses.
Ivan Fitness	Those making decisions in relation to the long term plan must be held accountable so the public can reward/condemn them. If under investment/bad decisions in the past, need to be held to account in a way that reflects poor management. Face consequences - publicly shamed/denounced etc. If no skin in the game then you should not be making decisions that affect you/the community.	That Council note the submitter's comment. There is a local government election process that allows the public to determine who will represent them every three years.
Mary Napper	Could we have the opportunity to meet with Councillors in our neighbourhood please. And perhaps take them for a drive along our gravel roads in a small domestic car. Why did we have to travel to Otautau or further afield to speak to elected representatives?	That Council note the submitter's comment and request that staff will look at holding meetings or drop-ins in for the public with councillors.
Diane Fretter	Council members and other council representatives (eg building) need to be more accessible. What about an afternoon once a month where the councillors are available for people to come and chat. If concerns can be aired and addressed more regularly, then the responses to the LTP may not be as reactive as I suspect they are.	
Le-Anne (Lee) Murray	The LTP consultation document wasn't delivered to a number of residents in the Tuatapere township, can you please explain why? Only got one week to provide my feedback in the given time period. Not ideal. To save on costs (printing costs of consultation document) a letter and/or email could have gone out to all residents so they could select whether or not they wanted a hard copy or electronic version.	That Council note the submitter's comment. Staff advise that there were issues delivering the consultation document to some households in particular areas of the district. Although this is regrettable, it is not mandatory for Council to deliver the consultation document to each household. Council choose to post out the consultation document in an attempt to reach as many people as possible, as we are aware that some people don't have access to the internet. A variety of advertising methods were also used to promote the document, and it could be accessed online.
Timothy Francis	The LTP review document was not delivered to my address, I only found out about it through a community action group at the last moment, leaving no time for thorough investigation. Lack of	

	community consultation and feedback does not indicate assent.	
Natalie Carran	Unimpressed LTP meeting was held in the local hotel. Believed it was noisy/inappropriate. Why was consultation document not delivered to every letterbox? Why did people receive them so close to the community consultation meetings? Step up SDC, make cuts elsewhere and find the money.	
Paula McKenzie	I submit that the LTP proposal contravenes the goals of transparency and ease of understanding. For example, as of the date of the scheduled consultation meetings in Tuatapere on Thursday 8th April, urban ratepayers had not received their consultation documents, therefore no time was allowed for them to respond before close of submissions.	
Katherine Morrow	Why are most SDC employees not District ratepayers?	That Council note the submitter's comment. Currently we have a number of our staff that live or pay rates in the Southland district. When we recruit staff we ensure we get the best people for the roles and in order to do this, especially with some difficulty in recruiting roles, we do not mind where they live. Council seeks appointments of staff who are suitably qualified, understand the local government environment, are prepared to serve our ratepayers and interested in our southland district.
Wendy Joy Baker	Council needs to praise volunteers.	That Council note the submitter's comment. Staff advise that in the past a thank you event has been held.
Ian Smith	Put together a system (pamphlets) for identifying historical info and cemeteries - suggest via website (website info at each place, to enable you to access the places where info is displayed (towns). I see it as a tourist (both local and others) attraction - as is the Scenic Highways	That Council note the submitter's comment. Staff advise that heritage brochures are available for many areas throughout Southland – they are created by local heritage groups.
Neville Lindsay	Councillors there before the last election should resign.	That Council note the submitter's comment. There is a local government election process that allows the public to determine who will represent them every three years.
David Boniface	Your asset management difficulties are no better or worse than other lower South Island local authorities. It is high time that all lower south island (at least rural) authorities looked seriously at amalgamation of resources and a strengthened lobby for NZTA and other Govt funding rather than competing against each other. Geez there is less than 100,000 people in all of Southland and we	That Council note the submitter's comment. Through our triennial agreement with our neighbouring local authorities we look for ways of combining resources and finding efficiencies. An example of this is Emergency Management Southland which is a combined service for civil defence and emergency management in Southland.

	have 4 local authorities and none performing at a satisfactory level.	
Youth Councillors	We don't feel like the LTP consultation targeted the youth market. We appreciate there is a formal consultation and submission process that needs to be followed. However, this can be intimidating for some people, especially as submissions and names become public documents. We would like consideration given to something less formal - perhaps a simple poll where people can agree or disagree with options. This might not be able to be included formally given legislation requirements, but would give Council a gauge on the majority feel. This can then be used by Council as part of the decision-making process.	That Council note the submitter's comment and request that it be passed along to communications staff. We are very aware of all markets and understand formal consultation cannot reach every market. Your idea of a simple poll is one we will use in the future.
Denis and Ngaire Bartley	I commend the council for beginning to address the wellbeing of its constituents however there is much to be done. Great South (SORDS) was/is based on the economics of growing businesses eg 10,000 more people and GDP growth. District and Regional councils need to concentrate on the other three aspects of wellbeing in the Local Government Act which are culture, social and environmental aspects to ensure a Thriving Southland. New Zealand along with Scotland, Wales and Iceland make up the Wellbeing Economics Alliance - WEAll. Southland needs to be fully involved in this movement.	That Council note the submitter's feedback. Council is aware and places significant importance on the purpose of local government to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future. The wellbeings are also a part of the development of Council's Strategic Framework which guide their decision making for the LTP.
Scott	Maybe 60k -300k salary isn't justified if you have to continuously crank up the rates to compensate for 'community leadership' that can't manage to communicate or manage infrastructure effectively. Quit blaming previous iterations of bereaucrazy and shifting central government priorities. It is 'your' problem, now, so fix it or be honest that you can't figure it out and ask for experienced ('not' qualified) volunteer assistance to figure it out.	That Council note the submitter's feedback. Remuneration is based on a number of factors at Southland District Council, including market information and experience. Our workforce is made up of suitably qualified and experienced individuals. Community engagement, including seeking input from volunteers, is critical to our success.
Imelda Sutherland	Forget about spending millions aimed towards tourism (overseas travellers). Covid -19 will stop a lot of international travel for years yet.	That Council note the submitter's feedback. Council contributes (along with other Councils) towards Great South as Regional Tourism organisation as tourism is a driver for economic development in Southland.
Peter Johnstone	CD in name only. Not enough options and they choices there are negligible since there is no real	That Council note the submitter's feedback. Staff advise that Council has limitations on the amount of information that can be included in the LTP

	choice. I appreciate the info. The only thing I picked up from the CD is that I ought to be improving water collection off roof and storing to protect against drought	consultation document. Council also provide a significant amount of supporting information to the consultation document to try and provide as much information for ratepayers to inform their submissions. Staff are always seeking to improve these processes and will take that feedback on board.
Katie Jones	There is no transparency and no reason to undermine our democratic values and divide our society by increasing funding to iwi from $42k to $221k. This causes inequality and racial discrimination for Non-Maori and destroys our until recent years tolerant and peaceful society. The Loss & Grief Centre receives a far too high grant. This grant should be slashed right down and given to St John or Counselling Services. Also scrap the Waituna P/Ship and certainly the Heritage Committee contribution and the Toimata Foundation (Enviro Schools are a joke). Scrap all Scholarships. Visitors to Stewart Island should pay a visitor levy, not ratepayers.	That Council note the submitter's feedback. Staff advise that Council has obligations under the Te Tiriti o Waitangi to partner with Iwi for many of Councils processes. Council has made changes to the way it provides grant funding and going forward the organisations you have mentioned will have to apply, along with any other organisation to the District Initiative fund, which is a contestable fund. Visitors to Stewart Island Rakiura pay a levy of $5. The funds are used to support increased infrastructure costs due to the number of visitors and to offset the effects of tourists.
Chris and Viv Shaw	Trust in SDC processes – In previous LTP processes the changes to the algorithms covered by the draft revenue and financing policy and rating review were included in the LTP consultation. In this round, SDC chose to not formally consult on these processes but luckily the Southland Times reported about them and some input was allowed. If SDC wants to develop trust in its operations from the community, such processes should be open, transparent and consulted upon in the usual way. Sections 78 and 79 of the Local Government Act gives guidance here.	That Council note the submitter's feedback. Staff advise that due to a number of proposed changes to the Revenue and Financing Policy, Council chose to seek feedback on that policy along with other LTP policies such as the significance and engagement policy and the development and financial contributions policy ahead of the LTP process. These policies were consulted on via public process from 4 November 2020 to 4 December 2020.
Stephen Hoskin - Fiordland Trails Trust	The Fiordland Trails Trust request that Southland District Council: - List the Lake to Lake and Te Anau Downs Trails as "Southland-wide assets" in the Long-Term Plan. - Include trails to Hidden Lakes, Mavora and Tuatapere in its Plan. - Include trail signage, a Te Anau cycling hub and Te Anau Lakefront development in the Long-Term Plan	That Council note the submitter's comment regarding signage and request that it be passed along to the community board for its consideration. Staff advise that the trails that have been developed by the Trails Trust are locally funded and therefore are not a district asset even though they are utilised by visitors from outside of the community board area. Any decision to include additional funding for the installation of signage and the construction of further trails would be at the discretion of the respective community board.
Sheila Watson – Heritage New Zealand	Heritage New Zealand recommends establishing non-regulatory heritage incentives such as a districtwide contestable fund or targeted area fund	That Council note the submitter's feedback. Council has been working with some owners to access government funding through the heritage equip fund with plans

	(to facilitate the seismic strengthening of heritage buildings in Southland District) - to protect and enhance the historic heritage of Southland District.	to continue assisting owners of heritage buildings to apply for funding through this funding avenue.
Leanne Liggett, Public Health South	Recommend the development of strategies to support community boards with their decision making (eg play and recreational strategy and health strategies) to promote wellbeing. Recommend SDC considers increasing its share of funding to continue the Safe in the South Coordinator Position which is critical to the success of this project. Recommends consistent language to promote the relationship in line with the UN Sustainable Development Goals.	That Council note the submitter's comment regarding signage and request that it be passed along to the strategy and policy staff. Staff advise that Council has a strategy development plan to address the identified strategy deficit and development opportunities. Staff will incorporate suggestions from submitters into this work programme, scheduled to commence in the second half of 2021. Council note the recommendation to maintain consistent language in line with the UN Sustainable Development Goals, and will seek to incorporate this into work streams around strategy development.
Arts Murihiku	Support SDC development of an Arts Strategy as a guide to future community planning.	
Sarah Greaney	In supporting the need for ongoing infrastructure investment, we request that SDC access central government funding for key projects to avert significant rates increases documented in the plan. The PGF (now PDF), Strategic Asset Protection Funding and Shovel Ready Project Funding went by the wayside with little benefit to Southland. There is opportunity with $13M of funding under the Tourism Infrastructure Fund being announced by Minister Nash. Fiordland has been badly affected following the February 2020 floods and impact of Covid 19. We urgently implore that Council put together strategically rounded and well-founded proposals for consideration of this fund which is to be targeted at the five most affected areas in the country, Fiordland being one of them. The Board LTP document did not reflect the Community Futures Plan that outlines a vision for Fiordland. The concept of big community, small council appears lost in the LTP document and the Board believes that it should have been consulted to finalisation. The projects identified for Fiordland are not truly representative of the future planning for the area. We also believe that the Milford Opportunities plan will require significant further input by Council and the Fiordland Community Board as well as bold investment. If central government wants to enable	That Council note the submitter's feedback. Staff advise that Council will continue to actively pursue Central government funding opportunities. The Council has limitations on the amount of information that can be included in the LTP consultation document. A full list of projects was included in the supporting information to the consultation document. Staff agree that options to look at new ways to work with CBs around consultation need to be investigated and developed for future processes. Council supports the Milford Opportunities project and is looking forward to receiving the recommendations and the final report before looking at how support can be provided and the next steps.

	the development of Milford Sound as an iconic part of New Zealand's visitor experience, then funding should be forthcoming to support this.	
Dianne Miller	Continue to fund Great South. Supports Community Initiative Fund to support local projects.	That Council note the submitter's feedback.
Matt Ammunson-Fyall	Support Destination Management Plans - important for Council to look after and invest in the quality of their region as a destination. Keep costs down, businesses are struggling, the next 3 years is a time for Councils to consider funding streams other than rates to maintain and develop infrastructure.	That Council note the submitter's feedback. Council is supporting Great South with implementation of the Murihiku Destination Management plan.
Mark and Vanya Bailey	Long term we need a Southland Regional Council by amalgamating the councils to manage the whole of Southland as one entity. That will streamline strategic policy making decisions and facilitate change. We have lost confidence in our councillors and staff hence our reluctance to accept rate increases. If the council worked in partnership with central government to achieve goals, rather than maintain the status quo (which is dysfunctional) we'd be happy to say 'thank you' and offer a 10 per cent rate increase. If council policy is to let everything go to a state of crisis, is it any wonder that Southland is in the state it's in. We need to plan for a sustainable future and make every dollar count right now. Need to include the tangata whenua.	That Council note the submitter's feedback. Staff advise that amalgamation of councils is governed by legislation and overseen by the Local Government Commission, it is known as a 'reorganisation'. A reorganisation initiative is a request for the Commission to consider a specific reorganisation proposal, such as the amalgamation of two or more districts. A reorganisation initiative can be proposed by one or more affected local authorities, a group of at least 10% of electors of an area or the Minister of Local Government. There is a local government election process that allows the public to determine who will represent them every three years. Staff agree that we need to plan for a sustainable future and work cost effectively – this is the purpose of the long term plan process.
Lauren Richardson – The Kai Collective	The Kai Collective asks Southland District Council to partner in projects that build additional resources and capacity within the local food system; to build Southland's food system prosperity and resilience from seed to bowl. The Murihiku Kai Collective would like to partner with the Southland District Council and asks to support it in its endeavours with the following: - Short term (2021-2022) SDC representative to be part of the Murihiku Kai Collective; Co-design a strategic food policy with Kai Collective; Larger focus on publicly available edible plantings and communications to wrap around this for public awareness of harvesting;	That Council note the submitter's feedback and request that it be passed to community leadership staff. Staff advise that they are interested to hear more about this initiative from the Kai collective and discuss a way forward.

	- Medium term (2022-2025) Centralised, council-led composting systems appropriate to Southland communities; SDC to host gardening and food resilience information on their website (see Christchurch City Council example); Support the Longwood loop distribution system; Scoping and role description for a paid regional food resilience coordinator; - Long term (2025-2030) Paid food resilience coordinator; Kai collective and Southland District Council to co-design role description; Provision of outdoor teaching spaces for edible gardening.	
Douglas Agnew/Jenny and Tony Tippet	Does not support CB's, fail to see why we have these.	That Council note the submitter's feedback. Staff advise that the strength of CBs is their connection to local areas and their ability to bring decision-making down to a level where citizens can have real influence. Council is required by the Local Electoral Act 2001 to review its representation arrangements at least once every six years, Council last did this prior to the 2019 election where representation was amended from 27 CB and CDA areas to nine community boards covering the whole district. It is during the representation review process that the community has its say on whether there should be community boards in the district and, if so, the number of boards; their names and boundaries; the number of members for each board including any appointed members; and whether the board area should be subdivided for electoral purposes. The next review will be undertaken in time for the 2025 elections.
Anita Geeson	SI/Rakiura CB - Believes that the "What's Happening in Your Area" section in the CD is misleading. It makes it sound as if these things will be done - this may not be the case. Majority of projects listed for Stewart Island/Rakiura CB are reliant on availability of VL funding rather than money which has been rated. Council processes make it difficult for CB's to move their projects forward in the desired time frames.	That Council note the submitter's feedback. The Council has limitations on the amount of information that can be included in the LTP consultation document. A full list of projects was included in the supporting information to the consultation document. Staff are always seeking to improve these processes and will take that feedback on board.
Andre Bekhuis	Requests that more power be given to community boards around local decision-making as they have excellent local knowledge. Put more staff in the area offices to work in their communities. Would like to see more work being done locally to save costs.	That Council note the submitter's feedback. Staff advise that from the start of this council term the communities of Southland district have been represented by nine community boards instead of the 27 groups that existed previously. While this change was necessary, the new arrangements are a very different way of operating than before. Council undertook to conduct a follow-up in early 2020 but this was postponed due to Covid-19. Council has started work on this follow-up and is undertaking a health check with the community boards.

		The objective of this work is to check that the successes expected from the new representation arrangements are being delivered and assess what adjustments may be necessary. Our CBs are an essential part of the identity of Southland District Council and it is very important that the goals of the changes made in 2019 are realised.
Myles Greber	Tuatapere Te Waewae CB - Suggests a 'master plan' for Tuatapere, discussed but not actioned should become a priority. This plan should benefit all of Southland, not just Tuatapere, so should be funded by help from Council or external consultation. Includes review of interpretive signs - a common theme does not exist currently in Tuatapere - this needs to be set before progressing. Railway building spending should be reviewed. The growing cost (> $160,000) just to restore the building may be unaffordable for Tuatapere. Locals need to have input in any decisions on this. The two items listed as; Tuatapere - investigation project Main Street and Tuatapere - investigation project Railway Station, each $10,000 should not go ahead until a 'master plan' is put forward.	That Council note the submitter's feedback. Staff advise that the state of main street and its vibrancy, beautification, and appeal has been identified as a key concern for the community board. This view has been shared by other members of the Tuatapere Te Waewae community during a community meeting on 16 September 2019 which was held to discuss ideas for a new community board plan. It is intended that the main street master plan will begin progressing at the start of the 2021/2022 financial year. It has not been deemed to be a district-wide issue as other community boards and their communities have not identified it as being a concern or priority for their towns. The money budgeted for the main street master plan is for the plan, not for actioning the plan. The plan needs to be completed before we can get an estimate of the cost of actioning it. Staff advise there are currently discussions being undertaken with a community group in Tuatapere who are looking at taking over ownership of the Tuatapere railway station building (for a community purpose) following an extensive community consultation. If this does go ahead and following legal transfer of ownership of the railway station building, the cost budgeted for the community board to restore the railway station may no longer be required. The community board and the community group in question have discussed the timing of the master plan work so it is ensured that both are aligned and complimentary of each other.
Rates and finance		
Duncan Jennings	We need to try and tax overseas travellers using our infrastructure.	That Council note the submitter's feedback.
Graeme Stuart	Rates Remission and Postponement Policy - use rates notices (either hard copy or email) going out to inform people of their options regarding remission, postponement or rates rebates on a regular basis.	That Council note the submitter's feedback. Staff advise that with the first instalment of rates for 2021/22, ratepayers also receive a rates assessment in the mail. On the back of the assessment are details of who is eligible and how to view the Rates Remission and Postponement Policy. The rates team also include a First Rate SDC rates news brochure with the first instalment which has a page explaining the Rates Rebate Scheme and how to apply. Council advertises information about the rates rebate on our local Facebook page and Grey Power's newsletter.
Paula McKenzie	Your preferred option of a 10.5% increase in rates is misleading as by your own calculations Tuatapere	That Council note the submitter's feedback. Staff advise that an average rate is used because the rates increase will be different for different property types and property values in different parts of the district. The sample properties page listed

	ratepayers will be looking at an increase of between 17% to 19%.	6 of the 28 residential townships on pages 24-25 of the consultation document to illustrate this – these did not include Tuatapere. The reason for the online tool was to provide this impact for individual ratepayers. We will incorporate a sentence making it clearer that the actual impact will depend on the services provided, the value of your property and its location more explicitly near the rates increase in the future. It was noted in the sample properties section.
Sandra Cooper	A lot of the work that needs doing could be done by people receiving the dole which the council/government pay for from the money we pay in taxes. Why can they not paint/garden etc reducing costs and giving meaningful work.	That Council note the submitter's feedback. Staff advise that they have a working relationship with the corrections department whereby people who are required to undertake community service assist staff to undertake work in the communities.
Chris and Viv Shaw	Changing face of Tourism - There has been a huge increase the number of small businesses hiding under the "Sharing Economy" cloak. SDC is reluctant to charge these small businesses such as AirBnB properties for the services SDC provides to them and their customers. This leaves residents and other businesses subsidising these "hidden" small businesses and the associated tourists. This has to stop and SDC has to be proactive in developing appropriate charging schemes. This would also increase fairness on those businesses that operate in the traditional way, paying appropriate rates and being subject to the required health and safety regimes.	That Council note the submitter's feedback. Staff advise that Council has noted previously it would like staff to investigate this. It has been on hold whilst undertaking the LTP and also to allow for insights from Auckland and Queenstown Councils who have implemented a separate rate. Part of this investigation will identify the additional administration required.
Darelle Jenkins – Hospitality NZ	General comments about Council activities at a national level - focused on number of aspects including infrastructure funding, and short-term rental accommodation (STRA).	That Council note the submitter's feedback. Points noted in regards to the utilisation of existing rating tools. Council is aware of the issues around short term rental accommodation and are looking at options around this issue. Staff are interested in having further conversations with Hospitality NZ. Council has noted previously it would like staff to investigate rating of STRA. This has been on hold whilst undertaking the LTP and also to allow for insights from Auckland and Queenstown Councils who have implemented a separate rate. Part of this investigation will identify the additional administration required.
Kim Reilly – Southland Federated Farmers	Southland Federated Farmers has been a long-standing submitter to SDC annual plans and long-term plans (LTPs). "Our position over the years has been for SDC to: keep its spending and rates	That Council note the submitter's feedback.

	increases in check; and maintain a rating system that results in a rates allocation that reflects the use of and benefit derived from council activities."	
Jaspreet Boparai	Why is provision for depreciation not sufficient for assets? The $25 million debenture dated 22/12/2009, in 2019/20 accounts is listed in the name of an entity not on the companies register. Why - please explain? What is current value? No detail available on 3 waters reform.	That Council note the submitter's feedback. When Council decided to rate fund its depreciation it acknowledged that the increase in rates would be significant and therefore agreed to increase the portion rated by 10% annually. The $25million is not cash it is "debt security stock" that is provided as security for the borrowings that Council takes out from Westpac Bank. It is similar to providing your house as security for the mortgage. Perpetual trust were operating as the professional trustee of the council debenture trust deed. This is one aspect of their business at the time and was a monitoring role only. We have never invested in this entity.
Andy & Pam Booth	Questions if the word going round is correct re: $25,000,000 Debenture Investment since 22 December 2009? Why hasn't this been used for road and bridge issues?	That Council note the submitter's feedback. Staff advise that the $25million is not cash it is "debt security stock" that is provided as security for the borrowings that Council takes out from Westpac Bank. It is similar to providing your house as security for the mortgage. Perpetual trust were operating as the professional trustee of the council debenture trust deed. This is one aspect of their business at the time and was a monitoring role only. We have never invested in this entity.
Ronald Henry Baxter	Unexplained security with 25 million dollars 2019-20 referring to an entity struck off companies register.	
Carole Elder	Requests to know what happen to and where is the $25 million that was invested back in 2017 (this was online at stuff this week).	
Local issues – rates, finance, funding requests		
Mandy R	Fiordland CB - Discusses paying a lot in rates not a lot in return, and that other centres seem to be getting huge amounts of investment. Requests to know if it is fair that $800k allocated to Te Anau over the next 5 years.	That Council note the submitter's feedback. Staff advise that rates are a contribution to services you benefit from directly such as running your tap and putting out the rubbish to those that you consume, by going to the park or the library or walking on the footpath or driving down the street. The majority of rates is the increasing cost of maintaining these services and the increasing compliance costs associated to ensuring that they are safe. Staff advise that the $800k appears to be in reference to the airport runway surface renewal, this is met from the airport rate that is charged to the Fiordland CB area.

Nigel Humphries, Accommodation Association Fiordland	Fiordland CB - Accommodation industry in Fiordland has been hit extremely hard with Covid and can't afford any increases in rates and need rates relief.	That Council note the submitter's feedback. Staff advise that should Council wish to consider rate relief for Fiordland accommodation, it has made remission provision, subject to Council resolution, as part of its Remission and Postponement of Rates Policy. This policy is currently being considered and if approved in its current form would allow Council to provide remission for significant extraordinary circumstances including pandemics.
Lee Yasar	Fiordland CB - Understands the need for rates increases however feels rates in Te Anau are wasted. Requests to know how increase in rates will help Te Anau.	That Council note the submitter's feedback. Staff advise that the increase will meet the inflationary cost of providing the current service and increasing compliance costs for services such as roads, bridges, footpaths, parks and reserves, wastewater, stormwater etc. These services are provided within each community and the district as a whole. The Te Anau Community Board have also identified a number of projets it wants to undertake within its community which are included in the Community board rate collected. This list of projects can be accessed through the LTP supporting information.
Myles Greber	Tuatapere Te Waewae CB - Requests that their property rating boundary be reviewed as it does not meet the criteria of the community board targeted rates differential category 'urban', and sits partially within the rural and urban rating zones. Suggests that the semi-urban category could also be applied more appropriately to their property and some others, in relation to the services they receive. Requests a review of available income streams as there are a number of minimum charge leases held by the CB (Tuatapere Te Waewae) that could be income streams based on 'user pays' rather than 'everyone pays' e.g. the domain, golf course etc.	That Council note the submitter's feedback. Staff advise that the boundaries were set with consultation from the boards and not all properties may receive services at their property, but are in an area where services are provided and receive a greater benefit than properties further away in the area. Staff advise that the board get to review every lease as each term comes up and can make appropriate decisions on any conditions that piece of land may have and the benefits i.e. community or commercial.
Phillip Leven	Fiordland CB - Believes that money spent in Manapouri benefits Real Journeys and boaties who come here and that the community do not get anything in return from this investment	That Council note the submitter's feedback. Staff advise that the Manapouri projects (boat ramp gabion basket replacement, Pearl Harbour boat ramp renewal, walkway and carpark) enhances the area and encourages tourism. Tourism flows through to more investment, businesses, jobs and growth in Te Anau. This in turn increases the rate payer base and spreads the cost of infrastructure likes roads and bridges over a larger population.
Ann Pullen	SI/Rakiura CB - If it is getting harder to allocate levy money, then change what it can be used for - make it flexible. Visitors benefit with the sewage	That Council note the submitter's feedback. Staff advise that review of the SIVL bylaw and policy is underway, and this feedback will be provided to that process.

	and electricity, use some levy money for maintenance for both of these. Plus the wharves are a benefit to visitors as well as locals (golden Bay Ulva Island) these always seem to need maintenance.	
Hamish McMurdo	I would like to ensure that I am not rated for water and sewage as I do not receive the service yet my rates are not much lower than a property with these services.	That Council note the submitter's feedback and request that a finance officer contact Mr McMurdo directly.
Otautau Museum and Heritage Trust	Wallace Takitimu CB - Requests for rates contribution from the Wallace Takitimu CB to the Otautau Museum and Heritage Trust, for ongoing costs to maintain the former courthouse building (Pouhere Taonga - Category 2 listed building 3822). This is Otautau's only heritage listed building. While the Trust will apply to other funds available, there is no guarantee, and believe that a local contribution would assist in maintaining the building to a higher standard. The Trust believe maintaining a heritage building in good order may encourage more people to visit Otautau, benefiting local tourism and the town as a whole. The Trust are seeking $5-10 per rateable property per annum, to be retained by the Community Board for distribution to the Otautau Museum and Heritage Trust for ongoing building maintenance.	That Council note the submitter's feedback and request that it be provided to the community board for its consideration. Staff advise that this would be at the discretion of the community board. Council has been working with some owners to access central government funding for their Earthquake Prone Buildings through the heritage equip fund and can provide support for an application for funding through this funding avenue.

Attachment 5

Issue and options paper – dust suppression and other roading matters

Background

Twenty-four submitters commented on a range of issues related to dust suppression and other roading matters. An overview of the comments is given below. The table at the end of this paper includes summaries of the comments received. In the table, staff have responded to the submitters' comments, and in some cases, have proposed a response. Proposed responses have been called actions, and these actions are highlighted in yellow.

The Proposed Southland Water and Land Plan makes the use of oil as a dust suppressant a discretionary activity requiring resource consent. Consequently, Environment Southland regulations regarding dust suppression have also changed, and applying oil to gravel roads is no longer allowed without a resource consent. As a result of these changes, residents in the District have not been able to apply affordable and effective dust suppression measures, and have had increased issues with dust.

Transport Activity Management Plan

Staff have had a number of sessions discussing a Transport Activity Management Plan (AMP) with councillors, and received guidance to help formulate the AMP. The AMP identifies strategic issues, risks, and identifies the need for investment in the district's roading network. The AMP was adopted on 10 March 2021 as part of the supporting information to the LTP consultation document.

The AMP covers dust suppression and alternative seal types in the Unsealed Roads section of the AMP, as is outlined below.

Overview

The District's unsealed metal surfaced roads constitute 60% (approx. 3000km) of the road network and carry only 15% of the traffic volume. Nearly 69% of the unsealed roads carry less than 50 vehicles per day. The objective of unsealed roads is to provide all-weather travel for all types of vehicles, however under intense or extreme weather events, access may not always be possible.

Dust suppressants/alternative seal types

In the future Otta Seals may provide a viable alternative to full seal extension where dust is the primary reason for public complaint. Otta Seals are a low-cost seal option used for seal extension and resurfacing treatments. At roughly $90,000 per kilometre, Otta Seals may be a financially viable option in the future. More data needs to be gathered on the long-term life and costs of these seals before proceeding with more than just trial sites. Council has just one trial site that has reached end of initial life and is now trialling a two-coat version over top to see how much extended life can be achieved. This will give an indication of the whole-of-life cost of the seal and how it compares to traditional seals.

Council will consider allowing Otta Seals to be used outside resident's houses at their own cost, as a substitute to using waste oil treatment (which is no longer permitted by Environment Southland). While Council will support these applications, there will be eligibility criteria and Council will not contribute towards the cost as it's not a level of service that is currently rated for.

Future improvements

Council could also investigate further whether stabilising agents produce any economic benefit to the road network. This includes further evaluation of Otta Seals and other agents applied to the road to extend maintenance cycles or dust suppressants.

Issues - Summary of Feedback

Staff have grouped the feedback into two categories. Dust suppression and other roading matters.

Twelve submitters provided feedback relating to dust suppression and the absence of affordable and effective products available to suppress dust.

Eleven submitters provided feedback relating to other general roading matters including repairs and maintenance, road sealing, state highways, public transport, road user tax, and roadside mowing.

Options

Two options have been identified for how Council could proceed. These are:

- option 1: to confirm the staff actions for dust suppression and other roading matters (highlighted in yellow in the table below)
- option 2: to amend the staff actions for dust suppression and other roading matters

Option 1 – To confirm the staff actions for dust suppression and other roading matters

Advantages	*Disadvantages*
• Council will be responding to some of the feedback received from submitters, on district and local issues • staff are aware of the current recommendations and have considered the impact.	• Council may wish to make other changes.

Option 2 – To amend the staff actions for dust suppression and other roading matters

Advantages	*Disadvantages*
• Council can incorporate any changes as it sees appropriate.	• depending on the request staff may be required to obtain additional information that may delay, or have an impact on the decision.

Discussion/analysis

As outlined above, Environment Southland has implemented rules preventing waste oil being put on roads. The scale of Council's unsealed network makes it more of a challenge to manage and offer the dust suppression services that have been deployed by other councils. Council is currently investigating how it can offer a service to help people affected by dust, but this needs careful consideration. Council would need to consider affordability, maintenance requirements, prioritisation and how to implement the roll-out

of dust suppression seals. Affordability of the existing level of service provided by Council is in question currently, with a significant rate increase proposed to maintain what we already have. On this basis, rating for an increased level of service (such as providing dust suppressant seals) would place more financial burden on our community.

Recommendation

That Council:

a) **Confirms the staff actions** (these have been identified and pulled up from the submitter summary table below) **for dust suppression and other roading matters, as follows:**

Submitter no. (in booklet)	Action	Action point for
Dust suppression		
1, 54, 73, 93, 116	to look at options to provide support to residents suffering from the impacts of dust	Council, staff
53, 99, 128, 152, 160, 170, 252	to consider the affordability, maintenance requirements, prioritisation and implementation of a programme to deliver dust suppressant seals	Council, staff
Other roading matters		
63	to continue to discuss with Waka Kotahi NZ Transport Agency the charges/taxes etc that may apply to electric vehicles	Council, staff
118	to discuss the iron bridge gravel track with Waka Kotahi NZ Transport Agency	Council, staff
132, 208, 257	to follow up with submitters where potential requests for service (RFS) have been highlighted	Staff

Excerpts of feedback on dust suppression and other roading

Name	Submission summary	Staff recommendation
Roads - dust suppression		
Diane Gibson	I live on a gravel road where we are no longer allowed to put oil on it to keep the dust down. I'm guessing none of the hierarchy live on a gravel road so have no idea what we put up with. Would love to see it sealed!	That Council note the submitter's feedback. The changes to rules around putting waste oil on roads to minimise dust issues sits with Environment Southland – not Southland District Council. Council has recognised that this change is having an impact on households and is looking at options to provide support in this area.
Trina	At 10% we are looking at $700 a year, so for that I would like free dust suppression over our yards road area and in-front of our house that has tenants who can't open windows or hang washing outside (this is tucked behind a 8 foot 2 metre wide hedge, (instead of us paying $1500 for it) and maybe less potholes on our very busy gravel road, and maybe our signs fixed when they get smashed, oh and if your re sealing our road could my entrances to our driveways and around our mail box please get resealed, as I keep my roadside tidy and mowed? Just look into all of this with common sense, and thoughts about how Covid has affected many people and how farmers are already facing battles with low incomes, not every farm in southland is a dairy farm, real consideration for everybody would be good option.	That Council note the submitter's feedback. The proposed rates increase is in response to the affordability of maintaining existing levels of services across the district. The contribution of rates that go towards roading are buying access for all users to utilise a complete transportation network – not just the services near each rate-payers property. Council acknowledge the significant impacts of Covid-19. Delaying investment in the core infrastructure now (even just in the short term) exacerbates the affordability issue in future years.
Christine Buchan	Other councils (Gore in particular) have a scheme where rural people can have outside their residences sealed to avoid continued dust. People living gravel roads would welcome this and would accept rates increases for it to happen.	That Council note the submitter's feedback. The scale of Southland District's unsealed network make it more challenging to manage and offer such services that have been deployed by other Councils. Council is currently investigating how it can offer some sort of service to help people affected by dust, but this needs careful consideration around the affordability, maintenance requirements and prioritisation of rolling out such programmes of dust suppressant seals. Affordability of the existing level of service provided by Council is in question currently with a significant rates increase proposed to maintain what we already have therefore rating for an increased level of service (such as providing dust suppressant seals) is a big commitment to the community.
Faylene Ferris-Olasa	If Otahuti Road and other roads affected by dust nuisance are not going to be sealed in the near or distant future, the dust nuisance will remain - so no point in investing more in my opinion.	That Council note the submitter's feedback. The proposed rates increase is in response to the affordability of maintaining existing levels of services across the District. The contribution of rates that go towards roading are buying access for all users to utilise a complete

		transportation network – not just the services near each rate-payers property. Affordability of the existing level of service provided by Council is in question currently with a significant rate increase proposed to maintain what we already have therefore rating for an increased level of service (such as providing dust suppressant seals) is a big commitment to the community.
Yvonne Muilwyk	Environment Southland and Southland District Council need to support residents who are suffering with gravel road dust after oiling of roads were banned with no real economic or practical solution offered in its place. Concerns about dusk from gravel roads. Cannot apply oil any more and now no solution. Causes long term health problems and restricts families/children using outdoor spaces – bad for their long-term development. Council should be supporting these families.	That Council note the submitter's feedback. The changes to rules around putting waste oil on roads to minimise dust issues sits with Environment Southland – not Southland District Council. Council has recognised that this change is having an impact on households and is looking at options to provide support in this area.
CR and JL McCrostie	You need to get more money from heavy truck road user charges (central government) as these are the people who are destroying our roads!! Stop wasting money. Concerns about the impact of dust impacts on respiratory health and the dust suppression rules.	That Council note the submitter's feedback. Council acknowledge that the vehicles utilising the roading network are getting bigger and heavier and this has been a contributing factor to the deterioration of roads. A challenge Council face is getting the balance right between what the network can handle vs the economic benefits of moving goods and services on the network in a more efficient manner. Waka Kotahi Transport Agency collect road user charges (RUC) and Council does not have jurisdiction over the amount of RUC collected. The changes to rules around putting waste oil on roads to minimise dust issues sits with Environment Southland – not Southland District Council. Council has recognised that this change is having an impact on households and is looking at options to provide support in this area.
Jared Gorrie	Supports increasing funding for roading, in particular supporting council in introducing a system to monitor dust and create acceptable limits of dust exposure and measuring systems for people who live near unsealed roads. The Ministry of the Environment have good practice for assessing and managing dust guidelines, adopting these would be a good start. Council needs to provide cost effective options to protect those who live beside unsealed roads and who are exposed to dust. I would support all options including speed restrictions.	That Council note the submitter's feedback. The scale of Southland District's unsealed network make it more challenging to manage and offer such services that have been deployed by other councils. Council is currently investigating how it can offer some sort of service to help people affected by dust, but this needs careful consideration around the affordability, maintenance requirements and prioritisation of rolling out such programmes of dust suppressant seals. Affordability of the existing level of service provided by Council is in question currently with a significant rates increase proposed to maintain what we already have therefore rating for an increased level of service (such as providing dust suppressant seals) is a big commitment to the community.
Terry MacNamara	The gravel section of the village entrance road is consistently corrugated due to high traffic flows. It would be good to seal it even just for the last half to mitigate dust as we can't oil the road.	That Council note the submitter's feedback. Affordability of the existing level of service provided by Council is in question currently with a significant rates increase proposed to maintain what we already have therefore rating for an increased level of service (such as providing dust suppressant seals) is a big commitment to the community. The changes

		to rules around putting waste oil on roads to minimise dust issues sits with Environment Southland – not Southland District Council. Council however has recognised that this change is having an impact on households and is looking at options to provide support in this area.
Diane and Noel Cournane	Dusty gravel roads. Concerned about dust. Mention dust prevention. Dust is getting in our water tank and they can taste dust in their drinking water.	That Council note the submitter's feedback. The scale of Southland District's unsealed network make it more challenging to manage and offer such services that have been deployed by other Councils. Council is currently investigating how it can offer some sort of service to help people affected by dust, but this needs careful consideration around the affordability, maintenance requirements and prioritisation of rolling out such programmes of dust suppressant seals. Affordability of the existing level of service provided by Council is in question currently with a significant rates increase proposed to maintain what we already have therefore rating for an increased level of service (such as providing dust suppressant seals) is a big commitment to the community.
Gael Hamilton	Live on a gravel road and since haven't been able to apply oil, struggled with dust. Can't open windows in dry weather, dust covers roof, ends up in water tanks – you say you want clean water for your people. Have applied only dust suppressant allowed - very costly and didn't last. Please help all residents on gravel roads.	That Council note the submitter's feedback. The changes to rules around putting waste oil on roads to minimise dust issues sits with Environment Southland. The scale of Southland District's unsealed network make it more challenging to manage and offer such services that have been deployed by other councils. Council is currently investigating how it can offer some sort of service to help people affected by dust, but this needs careful consideration around the affordability, maintenance requirements and prioritisation of rolling out such programmes of dust suppressant seals. Affordability of the existing level of service provided by Council is in question currently with a significant rates increase proposed to maintain what we already have therefore rating for an increased level of service (such as providing dust suppressant seals) is a big commitment to the community.
Duncan Jennings	Help fund OTTA seal on dusty roads where residents aren't allowed to oil roads anymore. Dust is big concern to a lot of residents.	That Council note the submitter's feedback. The scale of Southland District's unsealed network make it more challenging to manage and offer such services that have been deployed by other Councils. Council is currently investigating how it can offer some sort of service to help people affected by dust, but this needs careful consideration around the affordability, maintenance requirements and prioritisation of rolling out such programmes of dust suppressant seals. Affordability of the existing level of service provided by Council is in question currently with a significant rates increase proposed to maintain what we already have therefore rating for an increased level of service (such as providing dust suppressant seals) is a big commitment to the community.
Ewen Dunnage	Recently, the ability use oil to suppress dust on gravel roads has been banned and replaced with the use of a vegetable mixture. This is expensive, short term and honestly a waste of money.	That Council note the submitter's feedback. The changes to rules around putting waste oil on roads to minimise dust issues sits with Environment Southland – not Southland District Council. The scale of

	Otago Regional Council apply at no cost Otta Seal outside dust affected properties. They rate for this accordingly and it has been successful. I submit that SDC rate for Otta Seal to be made available to dust affected properties in the district.	Southland District's unsealed network make it more challenging to manage and offer such services that have been deployed by other councils. Council is currently investigating how it can offer some sort of service to help people affected by dust, but this needs careful consideration around the affordability, maintenance requirements and prioritisation of rolling out such programmes of dust suppressant seals. Affordability of the existing level of service provided by Council is in question currently with a significant rates increase proposed to maintain what we already have therefore rating for an increased level of service (such as providing dust suppressant seals) is a big commitment to the community.
Pam Yorke (Waihopai Toetoe Community Board)	Dust suppression – residents require options that are easily doable and cost appropriate. We have the biggest network of unsealed roads in the District, this is of significant concern to all our residents who reside on these, in particular the areas where there is significant heavy vehicle movements. We want our economy to continue to prosper, so we need to put in place realistic options.	That Council note the submitter's feedback. Council is currently investigating how it can offer some sort of service to help people affected by dust, but this needs careful consideration around the affordability, maintenance requirements and prioritisation of rolling out such programmes of dust suppressant seals. Affordability of the existing level of service provided by Council is in question currently with a significant rates increase proposed to maintain what we already have therefore rating for an increased level of service (such as providing dust suppressant seals) is a big commitment to the community.
Other roads		
Emma Peterson	Gorse removal and roadside mowing is extremely poor particularly in small areas.	That Council note the submitter's feedback. Council does its best in managing noxious weed control round the District, but it can be very challenging in some areas. Please provide more details on the areas of concern you are referring to so that we can investigate this further.
Brian Mason	The Government has announced that it is going to increase the number of electric vehicles it will be using. Have you notified the Government that you expect them to make it mandatory that all electric vehicles will be expected to pay Road User Tax to help maintain our roads? Thank you.	That Council note the submitter's feedback. Council expect to see the electric vehicle notion evolve in coming years of which taxes will no doubt apply once there is sufficient uptake. This is outside of Council's jurisdiction however Council does and will continue to raise this with Waka Kotahi NZ Transport Agency
Anthony Marshall	Im not sure who pays to maintain the Milford Sound Road. If this is the SDC, a good way to save money would be to make it a toll road. $10 per car and $50 per bus. User pays. This amount should assist in the clearing and maintenance of this mainly tourist road and with rates.	That Council note the submitter's feedback. The Milford road is a state highway and therefore is not within Council's jurisdiction. State highways are administered by Waka Kotahi NZ Transport Agency.
Jonathan Bringins	I dont read much about future proofing, looking for alternative solutions to problems. Appears to be a lot of the same old. What about mass public transport?	That Council note the submitter's feedback. Public transport systems are considered and the benefits they provide, but given the nature of the primarily rural network this isn't a key issue Council is trying to address at this time. Replacing key aging infrastructure needs to be the priority to allow for alternative solutions such as public transport to be implemented.

Chris and Viv Shaw	For a number of years now this, in its many variants, has been at the heart of rating decisions. This model must be well out-of-date due to: *pre-covid increases in tourist traffic *post-covid changes. SDC needs to find of way of charging for roading such that, where possible, all users of roads, and those driving road use to make money pay for the necessary roading network upkeep and development.	Council currently collects it roading rates through a combination of a fixed rate and a differential rate. The differential portion is calculated using a model that accounts for the estimated tonnage and impact of the various sectors. The tonnage for the sectors is updated with the LTP process.
Ross Shaw	This is regarding the road/track beside the Iron Bridge west of Wallacetown at the Oreti River. This access to the river for many people including familys swimming, fishing and kayaking and other sports. This track has not been graded for a few years and is all potholes and water lying and almost unusable for small cars etc. I am not saying it needs watertable and drainage ditches, just a grader to tidy it up so it can be used safely. At the moment it is a total disgrace. I am sure this is not too much to ask	That Council note the submitter's feedback. This gravel track is not a Council road and is situated within a state highway road corridor and therefore is not within Councils jurisdiction. State highways are administered by Waka Kotahi NZ Transport Agency. Council will raise this issue with them.
Douglas Agnew/Jenny and Tony Tippet	Revert some roads to gravel, huge saving here	That Council note the submitter's feedback. This may happen if Council proceed with option 2.
Vic Lanaway	I am really frustrated with the lack of repairs and drainage repairs on William Street, Riverton. Nothing for 22 years!!!!	That Council note the submitter's feedback. Staff will contact the submitter directly as to whether an RFS is appropriate in this instance.
Russell MacPherson	*Council has ownership of approximately 5000km of unformed roads this is about 10,000 Ha of land, this land could be sold and money used improve roading etc, also this land once in private ownership would pay rates at the moment this land doesn't have any rates generated.	That Council note the submitter's feedback. Where possible Council does sell unformed roads however this is not always possible as Council has a legal responsibility to ensure that all land titles have legal access.
Bryan Barnes	We are concerned about the lack of maintenance on roads, culverts and waterways, including forestry blocks. Roadside rubbish ends up in these culverts with gravel and they do not get checked and cleaned out. Council employees do not appear to be doing an efficient job.	That Council note the submitter's feedback. Maintenance of forestry blocks and waterways do not fall under the jurisdiction of Southland District Council. It would be helpful to know specific locations so that Staff can look into these. Staff will contact the submitter directly as to whether an RFS is appropriate in this instance.
Alan Bryce	Request sealing of the gravel road surface in the eastern road section of Palmerston Street, Riverton. Don't need footpaths on kerbs and gutters. Is there a seal or dressing which reduces dust without the need for road reconstruction?	That Council note the submitter's feedback. Affordability of the existing level of service provided by Council is in question currently with a significant rates increase proposed to maintain what we already have therefore rating for an increased level of service (such as extending the sealed network) is a big commitment to the community. OTTA seals require minimal road reconstruction and provide a good dust suppressant, however these are not cheap solutions.

Attachment 6

Issue and options paper – funding requests and grant structure

Background

Council assists a number of groups by providing funding that is used for a range of projects and activities that promote community well-being. There are several ways groups and organisations can receive funding and one part of this paper is suggesting a clearer way of awarding grants to reduce administration and give clarity to all applicants. Council also received six submissions that included requests for funding, so both issues will be discussed in this paper.

Summary of feedback

Six submitters have requested funding through the Long Term Plan consultation process.

They are:

- Paul Marshall, of the Western Southland Trails Trust - requesting $50,000 from Council for 50% of the cost of a feasibility study on the proposed trail
- Nathan Burdon, of Sport Southland - requesting the cost of a staff member to find innovative ways of increasing physical activity in the Southland District Council area (between $30,000 and $70,000)
- Otautau Museum and Heritage Trust - requesting the museum be funded through the Long Term Plan (a grant of between $7,275.00 and $14,550.00)
- Sir Don McKinnon - requesting $1 per resident to go to the NZ Memorial Museum and Visitor Centre in Le Quesnoy, France
- Stephen Hoskin, Fiordland Trails Trust - requesting $1.25 million for the trail to Te Anau Downs, and $250,000 for the completion of the Lake to Lake Trail. Also requesting yearly maintenance costs for the trails increasing to $22,400 a year in five years' time. Also requesting support for an administrative role
- Dianne Miller, Catlins Promotions - requesting $2000 funding for printing its Catlins Coast maps.

Issues – grant applications

Council needs to consider whether it wishes to allocate the six applicants the funds they request.

Western Trails Trust: this is a request for funding towards the feasibility study for a cycle trail in Western Southland. The $50,000 requested would add an additional 0.10% to the rates increase, as it was not budgeted for in the consultation document.

Sport Southland: this is a request for funding for a Sport Southland staff member to work in the Southland District area. This would cost between $30,000 for a part-time worker and $70,000 for a fulltime worker. At $70,000 this equates to an additional 0.14% to the rates increase, as it was not budgeted for in the consultation document. Sport Southland already runs two successful programmes on behalf of Council – the holiday programme and SwimSafe.

The Otautau Museum and Heritage Trust: this is a request for funding for the museum in Otautau. A similar request was made in 2018 in the last Long Term Plan for funding through the Regional Heritage Fund, and the submitter was advised the regional heritage committee managed that fund on behalf of Council and an application should be made to that. Funding has been given through the heritage fund to the trust, which also receives on average $6000 a year through the District Heritage Fund.

The NZ Memorial Museum and Visitor Centre, Le Quesnoy, France: this is a request for $1 per resident of the Southland District, which equates to $31,900. This would add an additional 0.06% to the rates increase as it was not budgeted for in the consultation document.

Fiordland Trails Trust: this is a request for $1.25 million for work on a new trail from Sinclair Road to Te Anau Downs, and $250,000 to complete the Lake to Lake Trail from Te Anau to Manapouri, as well as maintenance funding yearly increasing to $22,400 a year in five years' time and support for an administrative role. The funding for the capex projects equates to an additional 3.02% to the rates increase, as it was not budgeted for in the consultation document. The maintenance and administrative costs are approximately up to $50,000 a year, a 0.10% increase to the rates increase. Council has helped this project, as it completed work between the Te Anau boat harbour and the Upukerora, and funds $10,000 a year in maintenance costs through the Fiordland Community Board.

Catlins Promotions: this is a request to fund the printing of the Catlins Maps, an annual cost to the group. This costs $2000. It would be a no increase to the rates increase because of the small amount.

Option 1 – To fund all of the grant applications

Advantages	*Disadvantages*
• all applicants receive funding and their projects can continue.	• an extra 4.2% will go on the rates increase as none of the funding has been included in the draft document • none of these applications have been consulted on.

Option 2 – To not fund any of the grant applications

Advantages	*Disadvantages*
• there would be no extra increase on the rates budget.	• applicants would not receive funding.

Option 3 – To fund some of the grant applications

Advantages	*Disadvantages*
• support is given to some applicants.	• some applicants would not receive funding.

Issues – grant structure

Council reviewed and changed the grants process in 2018 to create community partnership funds for all the community boards, and a District Initiative Fund. Other grants were set up under the LTP process, along with long-standing grants, that have no review process.

The next stage of the process is reviewing all of these long-standing grants. This will involve transitioning those that are actually contacts for services (not grants) into contracts with a three-year review, and to refer the other recipients of long-standing grants to the District Initiatives Fund (with all former grantees then having to apply each year for a grant). This would create one source of truth for all grants and give fairness to the process, as it would allow Council to compare all grant applications together as part of the District fund process. It would tighten up accountability and also enable long-time grantees to actually ask for more funding when and if necessary.

This review has taken place but has not gone through to Council yet, and so this is a good opportunity to complete the review as well. All recipients of these grants have been sent letters at the beginning of this financial year advising them that there could be changes in the way grants are given out and that they would be informed about the changes. This process does not add any extra cost, but does add extra funding to the District Initiatives Fund.

If large applications are received through this fund, they can be recommended to be considered through the next LTP. If this takes place, work would be done before the consultation document goes out for consultation and large grants would be consulted on during that process, rather than a result of the consultation process.

Below is a table of the grants provided this year and what this proposal would mean:

Recipient	Grant amount	Proposed action
Life Education Trust	$5000	Amount transferred to District Initiatives Fund and recipient can apply for funding
Seven fire brigades throughout Southland District	$200 each – total $1400	Amount transferred to District Initiatives Fund and recipient can apply for funding
Citizens Advice Bureau	$2200	Amount transferred to District Initiatives Fund and recipient can apply for funding
Gore Counselling Centre	$1000	Amount transferred to District Initiatives Fund and recipient can apply for funding
Loss and Grief Centre	$15,000	Amount transferred to District Initiatives Fund and recipient can apply for funding
Southern REAP programme	$9600	Was a three-year application so finishes this year
Hollyford Conservation Trust	$10,000	Amount transferred to District Initiatives Fund and recipient can apply for funding
Cycling Southland – sponsorship for stage on Tour of Southland	$3000	Amount transferred to communications budget as sponsorship
High Values Area – Environment Southland	$15,000	Contract for service

Swim Safe programme – Sport Southland	$23,000	Contract for service
Southland Safer Communities	$10,000	Contract for service
Toimata Foundation – formerly Enviroschools (Environment Southland)	$10,000	Contract for service
Waituna Partnership	$25,000	Contract for service
Warm Homes Trust	$35,000	Contract for service
Stadium Southland for maintenance	$75,000	Contract for service

Council will write to all the above recipients to update them on what has been decided, either way.

It is also recommended that the District Heritage Fund, which is used to support Southland District's museums with operational funding, is changed to an annual operating payment to the museums rather than a grant process. At the moment the process sees the community liaison officers working with the museums to put the grants in and those are just adopted, so the recommended change would enable efficiency and some certainty to the museums rather than them going through the application process every year.

Options

- option 1: to change the grants structure to ensure all grants have to go through the District Initiatives Fund and to create contracts for services for present grants that are more work being done on behalf or for Council. Change the District Heritage Fund to an annual payment
- option 2: leave the grants process as is, with applications coming through the District Initiatives Fund and through the LTP, and a group of longstanding grants that are never adjusted.

Option 1 – to change the grants process

Advantages	*Disadvantages*
• creates more clarity for community groups on how to apply, what the criteria are and the yearly decision-making process • enables Council to recommend larger grants or funding partnerships to go through the LTP process but these will be known early on in that process and can be then consulted on • enables more accountability from recipients with clear reporting processes. • allows Council to compare grant applications so allows more fairness	• some recipients will no longer receive an automatic grant and will have to apply

Option 2 – to leave the grants process as is

Advantages	*Disadvantages*
• the present recipients continue to get their funding with no changes to the process	• there is no real clarity about why recipients continue to receive these grants, what the criteria are and the processes around it. • no consultation of grant applications through the LTP as they come in as part of the process • less accountability from recipients

Recommendation

That Council:

a) **Make decisions on whether to grant funding to any or all of the applications received as submissions to the Long Term Plan as outlined below:**

i) **Approves/declines a grant of $50,000 to the Western Southland Trails Trust for a feasibility study on the proposed trail**

ii) **Approves/declines a grant of between $30,000-$70,000 to Sport Southland for a staff member to find innovative ways of increasing physical activity in the Southland District Council area**

iii) **Approves/declines a grant of between $7,275.00 ($5.00 per rateable property) and $14,550.00 ($10.00 per rateable property) to Otautau Museum and Heritage Trust from the Wallace Takitimu Community Board area, to be retained by the Board for distribution to the Trust.**

iv) **Approves/declines a grant of $39,100 ($1 per resident) to the NZ Memorial Museum and Visitor Centre in Le Quesnoy, France**

v) **Approves/declines a grant of $1.25 million to the Fiordland Trails Trust for the trail to Te Anau Downs, and $250,000 for the completion of the Lake to Lake Trail. Also requesting yearly maintenance costs for the trails increasing to $22,400 a year in five years' time. Also requesting support for an administrative role**

vi) **Approves/declines a grant of $2,000 to Catlins Promotions for printing its Catlins Coast maps.**

b) **Adopt the new grant structure to ensure all grants have to go through the District Initiatives Fund and to create contracts for services for present grants that are more work being done on behalf or for Council.**

c) **Change the District Heritage Fund to an annual payment.**

Excerpts of feedback with funding requests

Request No.	Name	Submission summary	Staff recommendation
1	**Paul Marshall**	The Western Southland Trails Trust has been established to scope and oversee the design and construction of a $8 million shared walking and cycling trail from the Manapouri township to Te Waewae Bay, on the South Coast. DOC staff and the Southland Conservation Board have been supportive, but are constrained by the Murihiku Conservation Management Strategy (CMS) 2016. The CMS does not provide for the proposed trail which means that without some modification to the Conservation General Policy, the trail could not proceed across the conservation estate. The trust intends to undertake a feasibility study of the proposal at an estimated cost of $100,000 in 2021/2022. It is asking Council to fund 50% ($50,000) of that projected cost in the 2021/2022 financial year. The balance of the funds will come from private philanthropists, and community funding sources.	That Council notes the submitter's request and considers whether it wishes to provide funding in the LTP.
2	**Nathan Burdon - Sports Southland**	Following on from the success over the past two years of Council's holiday programme under the guidance of Sport Southland, it requests that the scope of investment be increased to support a role dedicated to supporting innovative approaches to increasing physical activity in communities throughout the District.	That Council notes the submitter's request and considers whether it wishes to provide funding in the LTP. It was suggested by the submitter spokesperson in the hearings this could be a cost between $30,000 and $70,000 depending on whether it is a part-time or fulltime role.
3	**Otautau Museum and Heritage Trust**	The Otautau Museum and Heritage Trust is requesting it be added as a recipient to the	That Council note the submitter's feedback. Staff advise that the regional heritage rate is provided to the

		LTP. The request states the trust was overlooked the previous time it applied, and it hopes Council will take into consideration the work that is being done inside this wonderful building and the need to keep it serviced.	Regional Heritage Committee for funding of the Southland Museum along with grants to other museums in the wider Southland Region. In addition, Council acknowledges the contribution to communities from local museums and provides a fund of $60,000 for allocation to museums in the District, along with the roving museum officer.
4	**Sir Don McKinnon**	Request for funding support for the NZ Memorial Museum and Visitor Centre, Le Quesnoy, France, from Council of $1 per resident. The project has already raised $8 million of $15 million. Requesting Southland District Council support the project, to remember those who gave their lives in the world wars to give us freedom.	That Council notes the submitter's request and considers whether it wishes to provide funding in the LTP. At $1 a resident, that would be a cost to rates of $39,100 and would be additional to the proposed LTP grants budget.
5	**Stephen Hoskin - Fiordland Trails Trust**	The Fiordland Trails Trust request that Southland District Council: - Make provision for $1.25m contribution to the capital cost of trail construction from Sinclair Road to Te Anau Downs and $250,000 for completing the Lake2Lake trail in five years' time. - Make future provision for maintenance cost of the entire trail from Te Anau to Te Anau Downs, starting at $6 000 per annum in the coming financial year and increasing to $22, 400 per annum in five years' time, when we aim to have the trail competed.	That Council notes the submitter's request and considers whether it wishes to provide funding in the LTP. The request made by the submitter on behalf of the Fiordland Trails Trust for financial support for capital works and for ongoing maintenance of cycle trails is significant. The request is split into three parts: 1) remaining construction cost of the Lake2Lake trail (estimated $250,000) 2) the construction of a cycle trail from Sinclair Road to Te Anau Downs ($1.25 million) 3) funding for the long term maintenance (estimated to reach $22,400 a year in five years) and administration costs (estimated $20,000 a year). There is no allowance in the draft LTP budgets for any of the costs requested.
6	**Dianne Miller**	Would appreciate funding support eg $2000 towards annual printing of the Catlin's Coast maps.	That Council notes the submitter's request and considers whether it wishes to provide any funding support in the LTP. Council does provide support for the Catlin's group by paying for an advertisement in the annual Catlin's brochure.

Attachment 7

Issues and Options Paper – Staff amendments

Background

Council has identified over the past two months items that have not been included in the 10 year budgets along with items in the supporting information to the draft Long Term Plan. These changes are considered necessary for accuracy or clarification. The exclusion of items may require prioritisation of expected work streams.

Summary of Feedback

As the items in this appendix were not included in the information used to support the consultation document there has been no specific feedback from the public. Council is asked to consider these staff proposed amendments within the context of the submission received as part of the public consultation process.

Issues

Staff have made every effort to offset any amendments so as not to increase rates where possible.

Subject to changes or amendments through the deliberations process the movement in proposed rates and movement of rates across the 10 year period of the Long Term Plan is outlined in the table below.

Rates LTP	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
CD Total Rates ($)	54,557,161	60,110,036	63,564,931	68,047,628	71,811,810	73,588,174	77,724,448	81,533,376	83,708,429	87,620,776
CD Rates Increase	10.15%	10.18%	5.75%	7.05%	5.53%	2.47%	5.62%	4.90%	2.67%	4.67%
Staff Admendments	-31,802	175,515	117,271	-46,410	-45,243	-68,834	-77,320	-94,476	-94,476	-84,975
Proposed Total Rates ($)	54,525,360	60,285,551	63,682,203	68,001,217	71,766,567	73,519,340	77,647,128	81,438,900	83,613,953	87,535,801
Proposed Rates Increase	10.08%	10.56%	5.63%	6.78%	5.54%	2.44%	5.61%	4.88%	2.67%	4.69%
Movement in Rates	-0.06%	0.39%	-0.11%	-0.27%	0.01%	-0.03%	-0.01%	-0.02%	0.00%	0.02%

The proposed amendments are set out below:

AMENDMENT 1	3 Waters Stimulus Grant
AMENDMENT REQUIRED	Include 3 waters stimulus grant income of $895,000 and stimulus projects of $895,000
STAFF COMMENTS	Southland District Council is to receive $13.53 million in grant for stimulus projects. This income and project expenditure was approved by Council in August 2020. $6.376 million is included in the draft LTP consultation document. The balance was to be included in the current financial year via forecasting. The above portion to be added to the LTP will not be completed by 30th June 2021 and therefore needs to be included in the Long Term Plan that is adopted.
IMPACT ON RATES	There is no impact on rates in 2021/22 or 2022/23
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Matt Russell

AMENDMENT 2	Adjustments to budgets from February 2021 forecasting
AMENDMENT REQUIRED	Projects to be included/removed from the Long Term Plan based on information received during the forecasting completed in February 2021.
STAFF COMMENTS	During the forecasting round completed in February 2021 a number of projects have been identified that will not be completed in 2020/21 but are to be deferred to 2021/22. There have also been some projects that have been included in the draft Long Term Plan that are now expected to be completed by 30 June 2021.
IMPACT ON RATES	The identified projects will be funded from a mixture of development contributions, reserves, external funding and loans ($35,292) is 0.07% decrease in the 2021/22 rates, and $120,449 is 0.2% increase in 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	All

AMENDMENT 3	Water and Wastewater Changes
AMENDMENT REQUIRED	Water and Wastewater changes $14,347
STAFF COMMENTS	Reduction in Water meter charges revenue is required due to the impact of Covid-19 on the accommodation providers in Te Anau $98,025. Net increase in maintenance of $91,000, due to drinking water reform changes and higher levels of monitoring and testing requirements. The above changes are offset by savings in repayments of loans and interest of $174,678 due to the deferral of Water and Wastewater projects in forecasting.
IMPACT ON RATES	This cost will be funded by rates.
	$14,347 is 0.03% increase in the 2021/22 rates included in the consultation document. There is no impact on 2022/23 rates.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Matt Russell

AMENDMENT 4	Community Hall Rate
AMENDMENT REQUIRED	Small adjustments to budgets to ensure Otapiri Hall and Blackmount Hall rates are collected at the correct rate.
STAFF COMMENTS	A number of halls set their rates as a fixed amount per Separately Used Inhabited Part (SUIP) rather than a total amount to be collected. The budget changes will enable staff to ensure that the amount collected is the correct amount requested in rates for the year.
IMPACT ON RATES	This cost will be funded by rates. $5,111 is 0.01% increase in the 2021/22 rates included in the consultation document. There is no impact on 2022/23 rates.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Shelley Dela Llana

AMENDMENT 5	Cemetery Memorial Walls
AMENDMENT REQUIRED	Increase the budget for replacing the memorial walls.
STAFF COMMENTS	As a result of further investigation into the replacement cost of a memorial wall it was identified that all the memorial wall budgets of $2,000-$4,000 needed to be revised to $10,000. Some of these increases were able to be funded by reserves and the remaining were funded with loans. Where loan were used the entire project was shifted to loan funding which has resulting in a positive impact on rates in 2021/22.
IMPACT ON RATES	This cost will be funded by a mixture of loans and reserves. ($33,000) is 0.06% decrease in the 2021/22 rates, and $8,488 is 0.01% increase in the 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Mark Day

AMENDMENT 6	Community Leadership Oraka Aparima
AMENDMENT REQUIRED	Increase rates in last year of LTP
STAFF COMMENTS	There has been unbudgeted expenditure in current year which has been funded by reserves. This has put reserves into negative in the last year of LTP and requires $3,091 of rates in 2030/31 to correct.
IMPACT ON RATES	This cost will be funded by rates. No impact on the 2021/22 or 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Joanie Nel

AMENDMENT 7	New Health & Safety Role
AMENDMENT REQUIRED	Add new Health & Safety Role for a fixed term of 2 years
STAFF COMMENTS	This role will develop and implement risk based management health and safety processes over all Council projects, staff and contractors.
IMPACT ON RATES	This cost will 50% funded by rates and 50% on-charged to projects across the organisation. This charge will be absorbed in existing budgets. $53,250 is 0.01% increase in the 2021/22 rates, and $52,250 is 0.01% increase in the 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Janet Ellis

AMENDMENT 8	Community Hall Projects
AMENDMENT REQUIRED	Remove budget for painting project for Waianiwa and increase budget for Tokanui Hall.
STAFF COMMENTS	Waianiwa Hall is due to be sold this financial year so the external paint project planned for 2027/28 is not needed and the $34,940 loan has been removed. Tokanui Hall has had unbudgeted expenditure this year and there is not enough reserve available so this $7,435 unfunded portion has been funded by loan.
IMPACT ON RATES	This cost was funded by loans. $1,149 is 0.002% increase in the 2021/22 rates, and $1,149 is 0.002% increase in the 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Joanie Nel

AMENDMENT 9	Community Toilets
AMENDMENT REQUIRED	Budget corrections for Glenburn Park Toilet, Otautau Arboretum toilet and Riverton Princess St toilet.
STAFF COMMENTS	The Glenburn Park toilet project 2020/21 has been reduced as a portion was not needed, the Otautau Arboretum toilet refurbishment 2024/25 and renewal in 2028/29 has been increased and Riverton Princess St toilet 2020/21 project has been deferred.
IMPACT ON RATES	This cost will be funded by loans. ($26,622) is 0.05% decrease in the 2021/22 rates, and $2,379 is 0.004% increase in the 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Mark Day

AMENDMENT 10	Interest on Reserves
AMENDMENT REQUIRED	The budget needs to be moved to the correct business unit
STAFF COMMENTS	Community Board business units have changed and budgets need to be transferred.
IMPACT ON RATES	This cost will be funded by reserves but there is net zero impact.
	No impact on the 2021/22 or 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Brie Lepper

AMENDMENT 11	SIESA Grant
AMENDMENT REQUIRED	Remove SIESA grant from the budget.
STAFF COMMENTS	The SI wind project is not going ahead (newspaper source) so further grants for the investigation work have been removed from the budget.
IMPACT ON RATES	This cost was funded by grants. No impact on the 2021/22 or 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Joanie Nel

AMENDMENT 12	Knowledge Management
AMENDMENT REQUIRED	Correct the LIM fee in the LTP.
STAFF COMMENTS	The LIM fee charge needs to corrected from $455 including GST to $380 including GST. This reduction in revenue has been offset after reassessing the conservative number of LIMs expected to be achieved in 2021/22.
IMPACT ON RATES	This cost will be funded by fees and charges No impact on the 2021/22 or 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Gillian Cavanagh

AMENDMENT 13	Stewart Island Jetties
AMENDMENT REQUIRED	Defer Ulva Island Jetty budget
STAFF COMMENTS	The renewal of the Ulva Island jetty has been deferred to 2021/22 until the required DOC Memorandum of Understanding has been signed, as agreed with the Community Board. In addition, the reserve funding is now not sufficient to cover the entire project so a portion has been funded by a new loan of $300,000.
IMPACT ON RATES	This cost will be funded by a mixture of reserves and loans ($2,290) is 0.004% decrease in the 2021/22 rates, and $13,076 is 0.0.02% increase in the 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Mark Day

AMENDMENT 14	Monowai Reserve and Playground
AMENDMENT REQUIRED	Playground budget has been deferred until next year.
STAFF COMMENTS	The playground upgrade at Monowai was originally budgeted for as two projects over two years. The current year's project has now been deferred so they can be combined into one project in 2021/22.
IMPACT ON RATES	This cost will be funded by reserves No impact on the 2021/22 or 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Mark Day

AMENDMENT 15	Riverton Beautification
AMENDMENT REQUIRED	Move interest on reserve to new code
STAFF COMMENTS	The interest on reserves in budgeted in an incorrect code so this will be corrected.
IMPACT ON RATES	This cost will be funded by reserves No impact on the 2021/22 or 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Mark Day

AMENDMENT 16	Community Pools
AMENDMENT REQUIRED	Change budget for community pool.
STAFF COMMENTS	Northern Southland Community Pool Funding request dated 1 March 2021.
IMPACT ON RATES	This cost will be funded by reserves No impact on the 2021/22 or 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Joanie Nel

AMENDMENT 17	Around the Mountain Cycle Trail
AMENDMENT REQUIRED	Defer budget to the following year.
STAFF COMMENTS	Around the Mountain Cycle Trail completion project has been partially deferred to 2021/22.
IMPACT ON RATES	This cost will be funded by loans. ($8,455) is 0.02% decrease in the 2021/22 rates included in the consultation document. There is no impact on 2022/23 rates.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Joanie Nel

AMENDMENT 18	Open Spaces
AMENDMENT REQUIRED	Defer budget to the following year.
STAFF COMMENTS	A criteria matrix is being designed to measure the identified projects that have access to the funding for Open Spaces. This process will assist staff in prioritising projects for funding across the district. Until this process is in place $500,000 of funding has been deferred from 2021/22 to 2022/23.
IMPACT ON RATES	This cost will be funded by loans. There is no impact on 2021/22 rates, and ($22,235) is 0.02% decrease in the 2022/23 rates included in the consultation document.
DOCUMENTS THAT WILL BE AMENDED	Long Term Plan and budgets
SIGN OFF	Mark Day

Options

Council has three options, these are:

Option 1 - That staff prepare the Long Term Plan with all the amendments requested

Option 2 - That staff prepare the Long Term Plan with none of the amendments requested

Option 3 - That staff prepare the Long Term Plan with some of the amendments requested

Option 1 - That staff prepare the Long Term Plan with all the amendments requested

Advantages	*Disadvantages*
• Rates reduce in Years 1, 3, 4, 6, 7 and 8 of the Long Term Plan • More accurate budgeting information	• Rates increase in Years 2, 5 and 10 of the Long Term Plan

Option 2 - That staff prepare the Long Term Plan with none of the amendments requested

Advantages	*Disadvantages*
• No changes to Long Term Plan budgets	• Inaccurate information being used to inform the development of the LTP

Option 3 - That staff prepare the Long Term Plan with some of the amendments requested

Advantages	*Disadvantages*
• Council can amend changes as they see fit.	• May result in delays to budgets being confirmed to support the development of the LTP

Recommendation

That the Council:

a) **Confirms Option 1 - that staff prepare the Long Term Plan with all the amendments requested**

Draft Alcohol Licensing Fee-Setting Bylaw Deliberations

Record No: R/21/3/14560
Author: Carrie Williams, Intermediate Policy Analyst
Approved by: Fran Mikulicic, Group Manager Environmental Services

☒ Decision ☐ Recommendation ☐ Information

Purpose

1 The purpose of this report is to provide information and to present options to Council, so that it can make decisions on the draft Alcohol Licensing Fee-Setting Bylaw (the draft bylaw).

Executive Summary

2 On 10 March 2021 Council endorsed a draft bylaw (see Attachment A), for public consultation. On 27 April, councillors were given a copy of the 19 written submissions that were received on the proposal, and heard those submitters who wished to speak.

3 In this report, staff have presented and discussed three potential options on how Council could proceed:

- option 1 – adopt the draft bylaw that Council endorsed for consultation, which removes the 30% discount to annual fees, increases annual, application and special fees by 10% for 2021/2022 and 2022/2023, and increase fees by 5% in years 2023/2024 to 2025/2026

- option 2 – revoke the current bylaw, thereby increasing annual fees by 30%, the rest of fee amounts would remain as prescribed by the regulations. Council would need to increase its rates contribution to the alcohol licensing activity from 10% to 22.5% and repay the overdrawn reserve from the district operations reserve

- option 3 – adopt a bylaw that makes no changes to the current bylaw, maintaining the 30% discount to annual fees. Council would need to increase its rates contribution to the alcohol licensing activity from 10% to 29% and repay the overdrawn reserve from the district operations reserve.

4 This report is seeking a decision from Council to choose its preferred approach.

5 Staff are proposing that Council adopt an Alcohol Licensing Fee-Setting Bylaw at its meeting on 23 June 2021.

Recommendation

That Council:

a) Receives the report titled "Draft Alcohol Licensing Fee-Setting Bylaw Deliberations" dated 30 April 2021.

b) Determines that this matter or decision be recognised as not significant in terms of Section 76 of the Local Government Act 2002.

c) Determines that it has complied with the decision-making provisions of the Local Government Act 2002 to the extent necessary in relation to this decision; and in accordance with Section 79 of the act determines that it does not require further information, further assessment of options or further analysis of costs and benefits or advantages and disadvantages prior to making a decision on this matter.

d) Considers the feedback received on the draft Alcohol Licensing Fee-Setting Bylaw.

e) Considers the options on how it could proceed.

f) Endorses one of the following options:

- **i) Option 1 – that Council proceeds with the Alcohol Licensing Fee-Setting Bylaw that it endorsed for consultation, or**
- **ii) Option 2 – that Council revokes the current Alcohol Licensing Fee-Setting Bylaw, or**
- **iii) Option 3 – that Council proceed with an Alcohol Licensing Fee-Setting Bylaw that is the same as the current bylaw.**

g) If it wishes to endorse option f)ii), increases the general rates contribution for the alcohol licensing activity from 10% to 22.5% and uses the district operations reserve to clear the overdrawn alcohol licensing reserve deficit.

h) If it wishes to endorse option f)iii), increases the general rates contribution for the alcohol licensing activity from 10% to 29% and uses the district operations reserve to clear the overdrawn alcohol licensing reserve deficit.

i) If Council endorses recommendation f)i) or f)iii), resolves that a new Alcohol Licensing Fee-Setting Bylaw will come into effect and supersede the existing Alcohol Licensing Fee-Setting Bylaw 2015 on 1 July 2021.

j) Acknowledges the draft Alcohol Licensing Fee-Setting Bylaw states that it will be reviewed within five years of adoption.

Background

Current bylaw

6 The purpose of the current bylaw is to set the amount of the annual fees that are charged to alcohol licence holders in the district. The current bylaw (Attachment B) provides a discount of 30% to the annual fee amount outlined in the Sale and Supply of Alcohol (Fees) Regulations 2013 (the regulations).

7 The discount was provided when this bylaw was last reviewed in 2015, in response to concerns raised by the hospitality industry that did not support the fee amounts in the regulations. At that time, there was a positive reserve that could be used to fund a portion of the shortfall of the costs of the alcohol licensing activity. The 2015 report to Council stated that the 30% discount was feasible for three years.

Reserves deficit

8 The income currently generated through alcohol fees is not meeting the annual costs for this alcohol licensing business unit. In addition, there is a negative reserves balance.

9 As at 30 June 2020, the alcohol licensing reserve was $84,000 overdrawn. It is expected that the overdrawn reserve will increase to around $170,000 at 30 June 2021. The key reasons for the increased deficit are:

- $75,000 due to the loss of revenue from licensing due to Covid-19 over the last two years. This is due to:-
    - less businesses changing hands and therefore less new applications being required;
    - a limited number of functions being held which in turn reduced the number of special licences being applied for; and
    - the budgeted income anticipating the 30% discount to annual fees would be withdrawn which never occurred because of the impact of Covid-19
- $14,000 legal costs above budgeted amounts were incurred as a result of a customer challenging a licensing decision
- $80,000 that should have come from a rates funded cost centre that were incorrectly allocated to the alcohol cost centre.

10 Based on this information, Council needs to consider if it is appropriate for licensees to fund the total reserve, a portion or none at all. Any amount not funded from licensees needs to be funded from Council reserves or general rates.

Proposed changes

11 The draft bylaw proposes to remove the 30% discount to annual fees. Alongside this, an increase of 10% to the amount in the regulations is proposed for annual fees, special licence fees and application fees for 2021 and 2022. In addition, accumulative 5% annual increases in each of these three fee categories are proposed until the bylaw is next due for review in 2026. The proposed changes are illustrated in the table below.

Table 1: Proposed annual percentage increases to alcohol fees

Fee type	21/22	22/23	23/24	24/25	25/26
Annual fees	Revoke 30% discount and add 10% to regulation base fee	+ 10%	+ 5%	+ 5%	+ 5%
Application fees	+ 10% to regulation base fee	+ 10%	+ 5%	+ 5%	+ 5%
Special licence fees	+ 10% to regulation base fee	+ 10%	+ 5%	+ 5%	+ 5%
Annual % increase is based on previous years fee					

12 It is intended that fees payable for manager's certificates, temporary authority and temporary licences continue to be set by the regulations for new or renewed certificates, noting that councils are not able to vary the manager's certificate fee amount provided for by the regulations.

13 The reason for the fee increase is to recover costs of operating the alcohol licensing business unit and to repay the negative reserve balance over the ten years of the Long Term Plan 2031 (LTP).

14 Council consulted on the draft bylaw from 12 to 26 March 2021. There were 19 submissions on the draft bylaw. A full summary of submissions received was provided in the 27 April 2021 report to Council. Council heard those wishing to speak to their submission at the 27 April 2021 Council meeting.

Summary of feedback

15 Submitters were largely against the changes proposed in the draft bylaw. In addition, 84% of those that provided feedback preferred the status quo (retaining the 30% discount to annual fees in the current bylaw).

16 Submitters commented that they are opposed to increasing alcohol licensing fees at this time, due to the ongoing effects of Covid-19 on the hospitality industry.

17 Feedback was also received that Council should find other ways to realise cost savings for this business unit, rather than increasing fees.

18 There were some comments that Council should be supporting alcohol license holders, as these establishments provide places for people to meet and socialise especially in rural communities.

19 A more detailed synopsis of this information may be found in the submissions and hearings report that was presented to Council at its 27 April meeting. The full submissions booklet is also attached to that report.

Efficiencies in the alcohol licensing business unit

20 The alcohol licensing business unit is considered to be efficient, given that it has operated for the past five years as the only Council in New Zealand that has discounted fee amounts.

21 The alcohol licensing team is expecting to implement a number of improvements in 2022 and 2023. Council's Quality Assurance Lead Officer will be basing herself in the alcohol team in late May 2021 for an extended period, after focussing on Building Solutions for over a year. Priority improvements include the implementation of online applications (and possibly registered user functionality in the short term), and then reviewing processing with a view to making our internal processes more efficient. Other items for continuous improvement consideration include Business Connect, process mapping and data capture. No new staff are considered to be required in the team at this time.

22 It is difficult to predict the dollar amount in cost savings of these efficiencies at this stage. By way of example, the introduction of online applications in other business units at Council has not had an immediate reduction in costs. However, this change does result in an improved customer experience.

Transparency of costs in the alcohol licensing business unit

23 In the 10 March 2021 report to Council, staff provided a breakdown of the actual costs for the years ending 30 June 2019 and 2020, for the alcohol licensing business unit. Submitters questioned the large increase in internal expenses between these two years. This highlighted the wages that were incorrectly allocated to the alcohol cost centre rather than coming from the appropriate rates funded cost centre. This has been corrected in the Long Term Plan budgets, which is shown in Attachment C.

24 Submitters provided feedback that it is not clear what they are paying for in the licensing fees. Almost all of the expense codes in the budget are utilised in every application. By way of example, a new manager's application involves:

- inspector time in preparation, interview and report and any other investigatory work
- time spent by the coordinator in receiving, processing, and issuing the certificate
- training of these staff and their technical resources
- internal support costs (computers, financial services, office space, photocopying, record keeping)
- managerial costs.

25 Overall these statutory functions are running lean, and are undertaken by only two full time positions with a small allowance for managerial oversight. Any changes in staffing have contributed to some time delays over the years as recruitment and training occur.

26 It is an option that commentary is added to the alcohol licensing section of Council's website to explain this itemisation.

Issues

27 In this report, three options have been presented on how Council could elect to proceed. The advantages and disadvantages of these options are discussed in the 'analysis of options' section of this report.

28 The issues for Council to deliberate are based on the implications of each option.

29 A summary of the three options being presented to Council are illustrated in the table below. The financial implications of options 2 and 3 are discussed in detail below.

Table 2 – summary of options presented to Council

Option	Action by Council	Implications for fees
Option 1	Adopt draft bylaw that Council endorsed for consultation	Fee increases as outlined in paragraph 11
Option 2	Revoke current bylaw	All fees as provided in regulations (removes the current 30% discount to annual fees)
Option 3	Status quo	30% discount to annual fees, all other fees as provided in the regulations

Implications of option 1 – adopt the draft bylaw Council endorsed for consultation

30 The dollar value implications of adopting the draft bylaw on license holders is illustrated in the table below, to show the actual increased amount that would be paid, if the draft bylaw were adopted.

31 The fee categories for annual and application fees range from very low to very high, according to the cost/risk rating of premises, provided in the regulations. The cost/risk rating is assessed using a number of factors in the regulations and includes the type of premises, trading hours and previous enforcements of the regulations. 80% of the annual fees paid in 2020 were in the low or medium category. 76% of the application fees paid in 2020 to Council were also in the low or medium category. Special licences range from class 3 (small, one off events), to class 1 (a large event, more than three medium events or more than 12 small events). 93% of the special license fees paid in 2020 were class 2 or 3.

Table 3 – Approximate dollar amount increases proposed in draft bylaw

	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26
	Current fee	Regs +10%	+10%	+5%		
Annual fees (80% of these fees paid in 2020 were low or medium)						
Very low	$113	+$64	+$18	+$10	+$10	+$11
Low	$274	+$156	+$43	+$24	+$24	+$26
Medium	$443	+$253	+$69	+$39	+$40	+$42
High	$743	+$396	+$113	+$63	+$66	+$69
Special licences (93% of these fees paid in 2020 were class 2 or 3						
Class 3	$63	+$7	+$7	+$3	+$4	+$5
Class 2	$207	+$21	+$22	+$13	+$13	+$14
Class 1	$575	+$58	+$63	+$35	+$36	+$38
Application fees (76% of these fees paid in 2002 were low or medium)						
Low	$610	+$60	+$67	+$37	+$39	+$41
Medium	$817	+$81	+$90	+$49	+$52	+$55
High	$1,024	+$102	+$112	+$62	+$65	+$69

32 Option 1 allows for the costs of the alcohol licensing business unit to be recovered and the total negative reserve for the alcohol licensing business unit to be repaid by 2029.

33 26% of submitters agreed with the draft bylaw, and 74% did not. Three submitters supported option one (the draft bylaw that went out for consultation), while 16 submitters preferred the current bylaw.

34 Submission number 16 discusses the fee increase amounts, and disagreed that there is a current 30% discount to annual fees. The reason for the confusion in this regard is that the current and draft bylaw fee amounts have all been calculated including GST. In contrast, the amounts provided in the regulations are GST exclusive. As a result of this feedback, the draft bylaw has been amended to add wording to clarify that all figures include GST.

Implications of option 2 - revoke the current bylaw, thereby reverting all alcohol fees to the amounts in the regulations

35 If Council selected this option, it would mean that all fees would remain at the current amounts, except for annual fees, which would increase by 30%, to the amount provided in the regulations.

36 Table 3 below shows the actual increase in amounts that would be paid for annual fees, if option 2 were selected.

Table 4: Dollar amount increases for option 2

	Current fee (2020-21)	Regulation fee amount (2021-22 through to 2025-26)
Annual fees (80% of these fees paid to Council in 2020 were in the low or medium category)		
Very low	$113	+$30
Low	$274	+$117
Medium	$443	+$190
High	$743	+$292

37 This option results in the alcohol licensing reserve being overdrawn by $513,083 by 2031.

38 If it selected this option, Council could increase the general rates contribution from the current 10% to meet the operational costs of the alcohol licensing business unit. An annual rate contribution increase of 22.5% would be required. This equates to a $28,000 increase in 2021-2022.

39 Council could use a general reserve such as the district operations reserve to clear the current overdrawn reserve of $170,000.

40 The balance of the district operations reserve as at 30 June 2021 is projected to be overdrawn by $150,000. As this is also the balancing reserve for many district business units, the actual balance of the reserve at year end may vary depending on the level of underspends.

41 No submitters supported option two, to revoke the current bylaw and revert all alcohol fees to the amounts in the regulations.

Implications of option 3 - adopt an Alcohol Licensing Fee-Setting Bylaw that is the same as the current bylaw, maintaining the 30% discount for annual fees

42 Option 3 entails fee amounts remaining the same as the current bylaw, illustrated in the table below.

Table 5 – Dollar amounts for annual fees for option 3

	Current fee (2020-21)	Regulation fee less 30% (2021-22 through to 2025-26)
Annual fees (80% of these fees paid to Council in 2020 were in the low or medium category)		
Very low	$113	$113
Low	$274	$274
Medium	$443	$443
High	$743	$743

43 Option 3 results in the alcohol licensing reserve being overdrawn by $665,597, by 2031.

44 If Council selected this option, it could increase its rates contribution from 10% to 29% in order to fund the operational costs of the alcohol licensing business unit. This equates to a $43,000 increase in 2021-2022.

45 Additionally, Council could use a general reserve such as the district operations reserve to clear the current overdrawn reserve of $170,000.

46 The balance of the district operations reserve as at 30 June 2021 is projected to be overdrawn by $150,000. As this is also the balancing reserve for many district business units, the actual balance of the reserve at year end may vary depending on the level of underspends.

47 The majority of submitters supported this option.

Council's financial obligations

48 Council must consider whether increasing the rates contributions for the alcohol licensing business unit, and funding the deficit from reserves, is consistent with its financial obligations under the Local Government Act 2002 (LGA) and its Revenue and Financing Policy.

49 Under the balanced budget requirement in the LGA, Council must ensure that each year's projected operating revenues are set at a level sufficient to meet that year's projected operating expenses (s.100(1)). It should be noted that 2021-22 financial year budgets have been drafted based on a 10% rates contribution for the alcohol licensing activity.

50 Council must also show for its sources of funding how it has complied with s.101(3) of the LGA. This section requires Council to meet its funding needs for each activity following consideration of factors such as who is benefitting, the period over which any benefit will occur, and whether the actions of a particular group contribute towards a need to undertake the activity.

Applying Council's financial obligations to increasing the rates contribution

51 Under the current Revenue and Financing Policy, the environmental services activity (which includes the alcohol licensing sub activity) general rates funding can be 33-66%, fees and charges 33-66% and other sources up to 33%. Increasing the general rates funding for the alcohol licensing sub activity to 22.5% or 29% still complies with the ranges in the Revenue and Financing Policy.

52 It is appropriate to apply Council's financial obligations to the options of increasing the general rates contribution from 10% to 22.5% or 29% for the alcohol licensing business unit.

53 The first step is to evaluate the public good of alcohol licensing and consider whether there are aspects of the alcohol licensing activity indicating that the rates contribution should be greater than 10%.

54 Assessing the public good includes looking at the community outcomes the alcohol licensing activity primarily contributes to. Council heard from submitters who feel that alcohol licensed premises play a role in the community as meeting and socialising places, and should be supported by Council.

55 The second step is to assess the overall impact of any allocation of liability for revenue needs on the community, and to consider if any changes are needed. This is in line with the Revenue and Financing Policy and s.101(3)(b) of the LGA. Such considerations include:

- affordability: balancing the affordability of increasing the rates contribution for the community against the affordability of the proposed alcohol fee increases for license holders
- fair treatment of different sectors: is it fair to increase the rates contribution for the alcohol licensing business unit, as compared to other business units within Council
- alignment with Council's objectives and financial strategy: Council has previously determined that this business unit should be largely self-funding.

56 Council has previously decided that a 10% rates contribution is appropriate, but it may modify this in response to feedback received from the community. It is acknowledged that 10% is lower when compared to other councils. As discussed above, Council's Revenue and Financing Policy permits this percentage to be increased, while still staying within the policy's ranges.

Applying Council's financial obligations to funding the deficit from district operations reserves

57 Council's funding obligations are also applicable if it chose to fund the deficit for the alcohol licensing business unit from the district operations reserve. Financial prudence is a key area for Council. When applied to local government, this means maintaining a balanced budget, where every day needs meet every day costs. It is generally not considered financially prudent to fund operational costs, such as the deficit for the alcohol licensing activity, from reserves. This is because over the long term, funding operational costs in this manner is not sustainable.

Discussion

58 Council must consider whether to increase alcohol licensing fees, or to increase the rates contribution for this activity, which would have the flow on effect of increasing rates for everyone in the district.

59 If alcohol licensing fees are not increased, then the unfunded "private benefit" portion of the cost will have to be collected in rates. It is recognised that alcohol license holders would have to pay more if Council adopts the draft bylaw, but on balancing of all the factors discussed above, staff consider this option as preferable to funding this business unit through rates.

60 Whilst increased fees will undoubtedly be challenging in a time of uncertainty, staff support adoption of the draft bylaw, because it considers that the fairest approach is to recover costs by ensuring those who benefit from the service principally fund them.

61 Council has the discretion to choose to increase the rates contribution and fund the deficit from the district operations reserve, in response to the feedback received to the consultation process, in order to help reduce the impacts of Covid-19 on alcohol licence holders.

Factors to Consider

Legal and Statutory Requirements

62 Alcohol licensing fees are set by central government, in the Sale and Supply of Alcohol (Fees) Regulations 2013.

63 Section 405 of the Sale and Supply of Alcohol Act 2012 (SSAA) enables councils to set their own fees for alcohol licensing, by bylaw.

64 Section 11 of the Sale and Supply of Alcohol (Fee-setting Bylaws) Order 2013 gives Council the authority to prescribe the fees payable to it in this regard, through a bylaw. The proviso to this authority, is that this must be done in the context of the fee's framework provided in the regulations.

65 Consultation on the draft bylaw followed the requirements of s.405 of the SSAA, which requires Council to consult with stakeholders that are representative of interests likely to be substantially affected by the bylaw.

66 The funding principles that apply to the options available to Council have been discussed above in the issues section of this report. These include the LGA s.100 requirement that Council ensure that each year's projected operating revenues are set at a level sufficient to meet that year's projected operating expenses. In addition, Council must also show for its sources of funding how it has complied with s.101(3) of the LGA. This section requires Council to meet its funding needs for each activity following consideration of factors such as who is benefitting, the period over which any benefit will occur, and whether the actions of a particular group contribute towards to need to undertake the activity.

Community Views

67 The community views captured through the consultation process on the draft bylaw were outlined in the report that went to Council on 27 April 2021. The full booklet of the feedback received through the formal consultation process was also included as an attachment to that report.

68 Submitters were generally opposed to the draft bylaw due to the effect that an increase in alcohol licensing fees would have on businesses. There was no support for option two (removing the 30% discount and revoking the bylaw). Three submitters supported the draft bylaw.

Costs and Funding

69 Costs associated with staff time, advertising, travel and legal advice to review this bylaw will be met within current budgets.

70 As discussed above, option 1 is the only scenario whereby the reserves deficit is removed, by 2029. Options 2 and 3 result in the reserve being overdrawn by $513,083 and $665,597 respectively, by 2031.

71 Alcohol licensing costs will increase for license holders by the amounts outlined in table 2, if option 1 is selected. There would be a 30% increase from the current bylaw if option 2 were selected, to the amounts shown in table 3. There would be no changes in the cost of fees for license holders if Council chose option 3.

72 Should Council wish to increase its rates contribution, the Long Term Plan budgets will need to be updated. Currently the rates contribution in year one is $22,397 which represents 10%. Should the contribution increase to 20% for example, a further $22,397 will need to be added to rates, this represents 0.4% in the rates increase.

Policy Implications

73 If the draft bylaw is adopted (option 1), there are policy implications for Council as well as for licensees in the district.

74 For Council, the policy implication of option 1 is that it will allow Council to remove the reserves deficit and ensure this business unit is self-funding by 2029.

75 For licensees, option 1 will involve increasing alcohol licensing fees at a time when this sector is recovering from the effects of Covid-19 in 2020, as well as adjusting to ongoing changes to alert levels.

76 If option 2 or 3 are adopted, there are policy implications for Council. These options move away from a user pays approach to the alcohol licensing business unit, which has been supported by Council previously.

77 Increasing the rates contribution and using reserves to fund the deficit for the alcohol licensing business unit is not considered to align with Council's financial obligations, as discussed in the issues section of this report. It also raises the issue of whether doing so treats all business units within Council consistently.

Analysis

Options Considered

78 The following reasonably practicable options have been identified:

- **option 1** – proceed with the draft bylaw that Council endorsed for consultation which removes the 30% discount to annual fees, increases fees by 10% (annual, application and special) for 2021/2022 and 2022/2023, and increases fees by 5% in years 2023/24 to 2025/2026

- **option 2** – revoke the current bylaw, thereby increasing annual fees by 30%, the rest of fee amounts would remain as prescribed by the regulations. Council will need to increase its rates contribution to this activity from 10% to 22.5% and repay the overdrawn alcohol licensing reserve from the district operations reserve
- **option 3** – proceed with a bylaw that makes no changes to the current bylaw. Council will need to increase its rates contribution to this activity from 10% to 29% and repay the overdrawn alcohol licensing reserve from the district operations reserve.

Analysis of Options

Option 1 – that Council proceed with the draft bylaw that Council endorsed for consultation.

Advantages	*Disadvantages*
• enables full cost recovery and repayment of the negative reserve over nine years • reflects Council's intention that this business unit is 90% self-funding (user pays) through fees generated. • consistent treatment of business units within Council • meets LGA balanced budget requirements	• this option was not supported by submitters due to the impact of increasing fees on businesses during the Covid-19 related economic downturn

Option 2 – that Council revokes the current bylaw. Council increases the rates contribution to 22.5% and repays the alcohol licensing reserves deficit from the district operations reserve.

Advantages	*Disadvantages*
• cost increase to license holders would be moderate, as only annual fees would increase by 30% • increasing the rates contribution is more consistent with the majority of Councils across New Zealand	• would result in an increasing overdrawn reserve • this option was not supported by submitters • Council will need to increase its rates contribution to this activity from 10% to 22.5% and repay the overdrawn reserve from another reserve • does not reflect Council's intention that this business unit is 90% self-funding through fees generated • may mean that business units within Council are not treated consistently • does not meet LGA balanced budget requirements

Option 3 – that Council proceed with a bylaw that makes no changes to the current bylaw. Council increases the rates contribution to 29% and repays the alcohol licensing reserves deficit from the district operations reserve.

Advantages	*Disadvantages*
• no changes to the fees charged to license holders • submitters largely supported this option	• would result in an increasing overdrawn reserve • Council will need to increase its rates contribution to this activity from 10% to 29% and repay the overdrawn reserve from another reserve. • does not reflect Council's intention that this business unit is 90% self-funding through fees generated • may mean that business units within Council are not treated consistently • does not meet LGA balanced budget requirements

Assessment of Significance

79 Staff have assessed that deliberation and adoption of this bylaw as not being significant in accordance with the LGA and Council's Significance and Engagement Policy. It is recognised that licence holders are affected by this issue, but the bylaw has minimal impact to the district as a whole. In addition, this decision has a low level of impact on the current and future wellbeing of the district and the capacity for Council to perform its role.

Recommended Option

80 It is recommended that Council proceed with option 1, the draft bylaw that went out for consultation.

Next Steps

81 If Council proceeds with option 1, staff will present the draft bylaw to Council for adoption at its 23 June 2021 meeting.

82 If Council proceeds with option 2 and revokes the current bylaw, staff would give public notice of the revocation. Staff would also send letters to people who submitted, informing them of the final outcome.

83 If Council proceeds with option 3, staff will present a draft bylaw to Council for adoption at is 23 June 2021 meeting.

84 This bylaw is due for review within five years of it being adopted, so if option 1 or 3 is selected, a subsequent review will need to be completed in 2026.

85 If Council proposes a different way forward, staff will outline next steps in line with the approach taken.

Attachments

A Draft Alcohol Licensing Fee-Setting Bylaw - endorsed by Council for consultation ⇩
B Current bylaw - Alcohol Fee-Licensing Bylaw 2015 ⇩
C Alcohol licensing business unit actuals and budget ⇩

SOUTHLAND
DISTRICT COUNCIL

Southland District Council

Alcohol Licensing Fee-Setting Bylaw

Southland District Council
Te Rohe Pōtae o Murihiku

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Southland District Council

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Document Revision

Date	Version	Revision description	Approved by	Approval date
2015	R/15/10/19215	Bylaw made	Council	28/10/2015
2021	R/21/2/7833	Bylaw made	Council	5/5/2021

Southland District Council

Title and commencement

Pursuant to Section 405 of the act and the Sale and Supply of Alcohol (Fee Setting Bylaws) Order 2013, Southland District Council makes the following bylaw:

- this title of this bylaw is the Alcohol Licensing Fee-Setting Bylaw
- this bylaw comes into force on 1 July 2021, and applies to fees payable from 1 July 2021.

Purpose

The purpose of this bylaw is to prescribe fees for matters to which fees payable to Council are prescribed in the Sale and Supply of Alcohol (Fees) Regulations 2013.

Interpretation

In this bylaw, words and phrases used in the act and regulations shall have the same meaning in this bylaw.

"act" means the Sale and Supply of Alcohol Act 2012

"Council" means Southland District Council

"regulations" mean the Sale and Supply of Alcohol (Fees) Regulations 2013

Fees payable

The table below sets out the fees payable to Council for annual fees, applications and licences as functions of Council which are carried out under the act.

Table 1: Fees payable (all fees include GST)

Type of fee	Fee category (cost/risk rating category)	Fees to apply (financial year)				
		2021/22 Revoke 30% discount and add 10% to regulation base fee	**2022/23 +10%***	**2023/24 +5%***	**2024/25 +5%***	**2025/26 +5%***
Annual fees for premises On/off/club	very low	$177	$195	$205	$215	$226
	low	$430	$473	$497	$522	$548
	medium	$696	$765	$804	$844	$886
	high	$1,139	$1,252	$1,315	$1,381	$1,450
	very high	$1,581	$1,739	$1,826	$1,918	$2,014

Southland District Council

Type of fee	Fee category (cost/risk rating category)	Fees to apply (financial year)				
		2021/22 **Revoke 30% discount and add 10% to regulation base fee**	**2022/23** **+10%***	**2023/24** **+5%***	**2024/25** **+5%***	**2025/26** **+5%***
Application fees for premises on/off/club	very low	$405	$445	$468	$491	$515
	low	$670	$737	$774	$813	$854
	medium	$898	$988	$1,037	$1,089	$1,144
	high	$1,126	$1,238	$1,300	$1,365	$1,434
	very high	$1,328	$1,461	$1,534	$1,611	$1,691
Special licenses	class 3	$70	$77	$80	$84	$89
	class 2	$228	$250	$263	$276	$290
	class 1	$633	$696	$731	$767	$805

* Annual % increase is based on previous years fee

Explanatory note:

- the fees set out in table 1 replace the fees payable under section 7 of the regulations, but are determined using the methodology set by the regulations. Fees payable for manager's certificates, temporary authorities and temporary licences continue to be set by the regulations for new or renewed licences
- To determine the applicable fee category (cost/risk rating category) refer to the regulations.

Repealed bylaws

The Alcohol Licencing Fee-Setting Bylaw 2015 is consequently repealed.

This bylaw has been confirmed by resolution passed at a meeting of Southland District Council held on 5 May 2021.

THE COMMON SEAL of the
SOUTHLAND DISTRICT COUNCIL
was hereunto affixed in the presence of:

_____ MAYOR

_____ CHIEF EXECUTIVE

SOUTHLAND
DISTRICT COUNCIL

Southland District Council

Alcohol Licencing Fee Setting Bylaw

Southland District Council
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Document Revision

Date	Amendment	Amended by	Approved by	Approval date
			Council	

Pursuant to Section 405 of the Act and the Sale and Supply of Alcohol (Fee Setting Bylaws) Order 2013 the Southland District Council makes the following bylaw.

1 Title and commencement

(a) This bylaw is the Alcohol Licensing Fee-Setting Bylaw 2015.

(b) This bylaw comes into force on 31 October 2015 and applies to licences with an anniversary date from 1 December 2015.

2 Interpretation

(a) "Act" means the Sale and Supply of Alcohol Act 2012.

"Regulations" mean the Sale and Supply of Alcohol (Fees) Regulations 2013.

(b) Unless the context otherwise requires words and phrases used in the Act and Regulations shall have the same meaning in this bylaw.

3 Annual fee reduction

The annual fee payable by a licensee of premises for which an on licence, off licence or club licence is held shall be the annual fee specified in the regulations less 30%.

This bylaw has been confirmed by resolution passed at a meeting of the Southland District Council held on _____ .

THE COMMON SEAL of the
SOUTHLAND DISTRICT COUNCIL
was hereunto affixed in the presence of:

_____ MAYOR

_____ CHIEF EXECUTIVE

Attachment C – Alcohol licensing business unit actuals and budget

For the year ending	Actuals Jun-19	Actuals Jun-20	Budget Jun-21	LTP Budget Jun-22
Alcohol Licensing				
Income				
Rates	23,799	24,664	29,423	22,397
User Charges and Fees	179,982	145,244	215,099	200,800
Internal Income	7,302	(664)	167	(2,715)
	211,084	**169,244**	**244,689**	**220,482**
Direct Expenditure				
Advertising	-	-	550	
Communications	863	1,241	1,188	1,000
Conferences and courses	2,051	594	3,100	3,000
Insurance	-	-	-	-
Other Expenditure	2,252	3,241	11,329	3,668
Postage and Stationery	96	108	220	200
Professional Services	775	18,255	6,591	6,591
Staff Costs	135,657	129,803	128,247	149,607
Supplies and Materials	122	-		
Travel and Accommodation	1,454	1,865	1,718	1,500
Vehicle Expenses	-	146	0	
	143,268	**155,253**	**152,943**	**165,566**
Indirect Expenditure				
Depreciation (Funded)	533	-		
Internal Expenses	60,472	144,526	142,438	58,438
Financial Expenses	-	-		
	61,005	**144,526**	**142,438**	**58,438**
Net Surplus/(Deficit)	**6,811**	**(130,535)**	**(50,692)**	**(3,522)**

Funded by				
District Operations Reserve	3,351			
Alcohol Licensing Reserve	3,459	(130,535)	(50,962)	(3,522)
	6,810	(130,535)	(50,962)	(3,522)
Alcohol Licensing Reserve				
Opening Balance	42,843	46,302	(84,233)	(135,195)
Plus Transfer to/(from) reserve	3,459	(130,535)	(50,962)	(3,522)
Closing Balance	**46,302**	**(84,233)**	**(135,195)**	**(138,717)**

Draft Remission and Postponement of Rates Policy - Deliberations

Record No: R/21/4/19921
Author: Nicole Taylor, Finance Development Co-ordinator
Approved by: Anne Robson, Chief Financial Officer

☒ Decision ☐ Recommendation ☐ Information

Purpose

1 The purpose of this report is to deliberate on the draft Remission and Postponement of Rates Policy.

Executive Summary

2 On 10 March 2021, Council endorsed a draft policy for public consultation. A copy of the draft policy is included with this report as Attachment A. The current policy can also be found in the 10 March 2021 agenda. Submissions were accepted between 8am on 12 March to 5pm on 14 April 2021.

3 On 28 April 2021, Council received the one submission on the draft policy. In summary, the submitter was opposed to most of the changes proposed in the draft policy on the basis that it is unfair to ask other ratepayers to make up for the loss in rates income resulting from the remission and postponement provisions. They did support the ability to write-off small balances which are uneconomical to collect.

4 Additionally, Council has heard from ratepayers as part of the submissions received on the Long Term Plan about the impact of COVID-19 and the affordability of rates on some sectors and areas. The draft policy allows for Council to provide rates remission for significant extraordinary circumstances including pandemics. It also includes provision for rates remission or postponement for financial hardship where the ratepayer has limited financial capacity and owns the home personally.

5 Although Council considered and decided against providing a general fund for additional rates remission support for low income households within the draft policy, given the submissions Council may wish to re-visit this option. This is discussed further in the issues section.

6 Staff are seeking direction from Council on any changes it wishes to make to the draft policy. Any direction given will then be incorporated into the draft policy that will be presented to Council in due course.

Recommendation

That Council:

a) Receives the report titled "Draft Remission and Postponement of Rates Policy - Deliberations" dated 30 April 2021.

b) Determines that this matter or decision be recognised as not significant in terms of Section 76 of the Local Government Act 2002.

c) Determines that it has complied with the decision-making provisions of the Local Government Act 2002 to the extent necessary in relation to this decision; and in accordance with Section 79 of the act determines that it does not require further information, further assessment of options or further analysis of costs and benefits or advantages and disadvantages prior to making a decision on this matter.

d) Agrees to consider the submission feedback received

e) Agrees to request staff to prepare and present the draft Remission and Postponement of Rates Policy to Council incorporating any amendments agreed at this meeting.

Background

7 The Remission and Postponement of Rates Policy specifies the circumstances where Council will consider remitting or postponing rates. A remission is where Council reduces the amount of rates to be paid and a postponement is where Council delays the payment of rates.

8 Council may remit and postpone rates on any property, in any amount, and for any reason as long as this is provided for in the Council's policy. The Society of Local Government Managers (SOLGM) have noted that remissions are typically used to:

- simplify the administration of the rating system – e.g. remitting uneconomic rates balances
- aid groups deemed to be 'worthy causes' such as sporting and cultural groups.
- manage the unintended or undesirable effects of the provisions in the Rating Act around owner liability for rates, or manage sudden shifts in the incidence of rates and
- allow some discretion to rate appropriately when the unexpected happens (for example with land that has been affected by a natural calamity).

9 In terms of postponement provisions, SOLGM have noted that these are used mainly in the case of hardship or where there is some economic or environmental objective in mind.

10 The Council's draft policy was reviewed to ensure that it is fit for purpose and is aligned with Council's LTP 2031 and other funding and financial policies. The draft policy included a number of additional clauses to:

- provide remissions for significant extraordinary circumstances (such as earthquakes, floods, pandemics) as determined by Council resolution
- cover remission of small balances which are uneconomical to collect
- provide additional flexibility to remit rate penalties to encourage ratepayers to bring their accounts up to date.

11 Other changes proposed included:

- removing reference to the 50% remissions for community facilities owned by persons, general clubs, societies or associations which are already provided for under the Local Government Rating Act
- expanding remission for community facilities owned by persons, general clubs, societies or associations to include facilities used for "community service" and "healthcare"
- clarifying that community facilities will be excluded from receiving a remission if they receive "operational" funding from government or associated agencies (not capital funding).
- including additional criteria in provisions for remission/postponement for extreme financial hardship to clarify the ratepayer's circumstances.

12 In developing the draft policy, Council did consider a number of other matters which were discussed but which were not included in the draft policy. These included:

- extending certain remission policies to cover tenants or lessees who have responsibility for paying rates but whom are not the property owner.
- providing a specific remission for the wastewater rate for non-residential rating units that have multiple pan charges in circumstances where the property is not fully utilised for extended periods of time.
- providing a remission for low income households that would work in conjunction with the government rates rebate.

Issues

13 Council only had one formal submission on the draft policy. That submitter was against other ratepayers picking up the cost of lost rates.

14 Council also heard from submitters as part of the Long Term Plan submission process around the impact that COVID-19 was having on them financially and also from a number of submitters concerned for themselves and others who were on fixed low incomes, principally those on benefits and the elderly and families on low incomes who were struggling to meet current commitments before the potential rate increase.

COVID-19

15 Council encouraged ratepayers last year to contact Council and work through options in regards to rate payments. It recognised that the circumstance for each ratepayer is different and it wanted to recognise this and work with ratepayer. A small number of ratepayers contacted Council and staff have worked with them to manage rates commitments. This option continues to exist for ratepayers.

16 Additionally as part of reviewing the remission and postponement of rates policy, Council incorporated a remission clause to allow for significant extraordinary circumstances (such as earthquakes, floods, pandemics) as determined by Council resolution. As part of the resolution Council needs to outline the event covered, how the event is expected to impact the community, who will be affected, what will be remitted and the timeframe for the remission.

Affordability

17 As background information, approximately 82% of residential rates are fixed charges for activities such as water, wastewater, rubbish, community board rates as well as a portion of the roading and district rate. This means that irrespective of your income or ability to pay, everyone pays the same

18 As part of the initial discussion with Council over a possible hardship remission pool, it was noted that Council does not have the information that Central Government organisations do around personal incomes and situations, as such it is more appropriate that these organisations provide the advice and support needed. As such no other remission sections were included.

19 The Government provides the rate rebate scheme which allows ratepayers who live in their own home to apply for up to $640 to offset their rates, depending on their income and the level of rates they pay. The maximum rebate has increased slowly over time but is not reflective of most rate increases for example in 2015 the maximum rebate was $610, thereby increasing $30 in the last five years.

20 A number of submissions and submitters to the Long Term Plan, talked about the financial impact of the proposed rate increases on them, those with low fixed incomes, particularly the elderly and those receiving Government benefits as well as low income families. In Tuatapere, residents noted that their increase was 18% on last year resulting in a rates increase of approx. $480 a year. Many of the submitters who spoke around financial hardship, noted that they received the government rate rebate already.

21 The current and draft remission and postponement of rates policy includes the ability of those who experience hardship and live in their own home and have no other significant income or assets to be able to apply for the postponement of their rates. This does not write the rates off but delays the income available to Council. Staff are delegated to assess this, no postponements have been undertaken in recent times.

22 The draft policy also allows for individual application for remission of rates for extreme financial hardship where the property is personally owned and occupied by the ratepayer applying and the ratepayer has taken all necessary steps to claim appropriate benefits and they have no other assets or income. Staff are delegated to assess this and there exists at this time no budget to meet any remitted rates. No remissions for this reason have been applied for in recent times.

23 As noted previously, some Councils across New Zealand, offer further assistance for low income ratepayers in addition to the support offered by the Government by way of a pool fund. Although Council considered and decided against including any additional assistance in the draft policy, Council may wish to re-visit this option given the level of submissions around affordability.

24 How any further assistance would be given, would need to be worked through further with Council, but as an example one Council allows a total fixed sum in their budgets, sets the criteria then applies a first in, first served basis up to the maximum of the amount budgeted. As this is a remission, it will mean that other ratepayers fund the rates remitted, as noted by the one submitter to this policy. To understand the potential rating impact, for every $100 thousand of remission rates would increase approximately 0.2%. The creation of a pool may give greater transparency to any financial hardship applications.

Factors to Consider

Legal and Statutory Requirements

25 Section 85 and 86 of the Local Government (Rating) Act 2002 (LGRA) enables Council to remit or postpone all or part of the rates on a rating unit as long as Council has adopted a Rates Remission Policy and/or Rates Postponement Policy under section 109 and 110 of the Local Government Act 2002.

26 The policy must state the conditions and criteria for each remission and postponement category.

27 Council has a substantial amount of discretion to grant a remission or postponement of all or part of a ratepayer's rates under the LGRA. The draft policy complies with the requirements of the Act.

28 Consultation on the draft policy followed the requirements of s.82 and s.82A of the LGA with the draft policy and relevant information publicly available and encouraged people to give feedback on Council's 'make it stick' platform, by:

- placing an advertisement in the Ensign and Southland Express
- promoting consultation on Council's Facebook page
- having the draft policy accessible on Council's website and at all of its offices
- encouraging community boards to make a submission.

Community Views

29 Under Section 78 of the LGA, Council must, when deciding how to proceed, consider the views and preferences of persons likely to be affected by, or to have an interest in, the matter. There is not a requirement to agree with the submitters, but Council must consider the views that have been expressed, with an open mind.

30 The only submitter, disagreeing with the proposed changes to the policy (particularly in relation to significant extraordinary circumstances) was that it was unfair to ask other ratepayers to pick up the loss of rates income as well as concerns about who will decide who is affected by an event and to what degree. They suggested instead that Council should make exceptions on a case by case basis. The submitter also commented that all penalties should be removed and suggested that Council use other tools like posting reminders, phoning ratepayers and using debt collectors if needed. They noted that ratepayer's money should be spent wisely in order to keep rates down

31 In addition to consulting on the draft policy, Council has also received a number of submissions on its Long Term Plan (LTP) 2031 consultation document which included an issue around the level of rates increases. While these submissions are subject to a separate report, a number of points raised by LTP submitters about rates affordability and rates on low income households that could also be dealt with by providing rate remissions for such circumstances. This is an option that Council may want to consider as part of the deliberations on the submissions received to the draft policy and LTP before these are prepared for adoption.

Costs and Funding

32 The draft policy as consulted on is not expected to have a significant impact on costs and funding over and above what is included in current budgets. For the 2020/2021 financial year, the value of remitted rates was around $483,000 (including GST) across 527 rateable properties. This represents 0.84% of the total rates struck for the year ($57.3 million incl GST) on 2.8% of the total number of rateable properties (19,122). There has been little change in these figures since 2017. No postponement of rates have been requested for a number of years.

33 As noted above in the issues section should Council wish to explore further a low income remission for ratepayers this will increase the rates required unless other cost reductions are identified.

Policy Implications

34 If the draft policy is supported as presented, Council will be able to respond to significant extraordinary circumstances (such as a flood, pandemic, earthquake) when they occur by considering remitting/postponing rates on affected properties.

35 The draft policy also provides greater scope for penalty remission to encourage/incentivise full payment of rates.

36 As outlined earlier, a number of submissions to the LTP 2031 consultation document also related to rates increases. In deliberating on the feedback raised by these submitters, Council may also want to consider whether there is an opportunity through the draft policy to include additional provisions to address these concerns (e.g. providing rates remissions related to rates affordability for low income households) or other associated feedback. Depending on the nature of any changes considered, this may extend the process related to the draft policy review.

Analysis

Assessment of Significance

37 Staff have assessed the deliberation as not being significant in accordance with Council's Significance and Engagement Policy because we are hearing the views of the community.

38 The inclusion of any pool fund as a result of this report is not seen as a significant change as its purpose is to provide greater transparency to the application of monies for financial hardship.

Recommended Option

39 Staff recommend Council proceed with the only practical option available to it - to deliberate and provide feedback to staff, including any amendments required on the draft Remission and Postponement of Rates Policy. The advantages of this option are that Council can consider community views on this matter, and comply with s.82 consultation requirements in the LGA. There are no known disadvantages of this option.

Next Steps

40 After deliberating on the submissions received for the draft policy and the LTP consultation document, Council will identify what amendments, if any, may be required to the draft policy.

41 Council staff will then work to incorporate the feedback, if any, into the draft policy and present it to Council in due course.

42 Council staff will then contact submitters and publicly notify that a new policy has been adopted.

43 There is a requirement to review this policy within six years of being adopted, so if the draft policy is adopted in May 2021, a subsequent review will need to be completed by 2027.

Attachments

A Draft Rate Remission and Postponement Policy ⇩

SOUTHLAND DISTRICT COUNCIL

DRAFT Remission and Postponement of Rates Policy

Group Responsible: **Chief Financial Officer**

Date adopted: **XX 2021**

Implementation date: **1 July 2021**

File No: **R/20/8/32479**

Purpose

The objectives of the policy are:

- to provide financial assistance and support to ratepayers where it is fair and reasonable to do so
- to address rating anomalies
- to provide Council with the ability to act reasonably in administering its rating powers and policies
- to support broader Council outcomes and specific objectives as detailed in this policy.

Southland District Council sets rates under s.23 of the Local Government (Rating) Act 2002. Rates are used by Council to fund costs once all other funding sources are taken into account.

Section 102 of the Local Government Act 2002 provides that a council may have a rates remission and postponement policy (the policy). This policy provides full details of each remission and postponement as well as the objectives and criteria for each.

This policy has been developed in accordance with s.85 and s.87 of the Local Government (Rating) Act 2002 (LGRA), and ss.102(2), s.109 and s.110 of the Local Government Act 2002 (LGA).

In addition to the provisions in this policy, the LGRA also identifies land that is non-rateable land under s.8 and schedule 1 (refer to Appendix A).

Definitions and abbreviations

TERM	MEANING
Service Rates	includes rates for water and wastewater rates and associated loan charges as well as for rubbish and recycling bins.
Sports Associations	includes societies, clubs or association of persons (whether incorporated or not) for games or sports, except galloping races, harness races, or greyhound races.
Significant Extraordinary Circumstances	as defined by Council resolution. Significant extraordinary circumstances may be natural or economic in nature (e.g. including, but not limited to, flood, earthquake, pandemic).
Financial Hardship	where a person, after seeking recourse from government benefits or applicable relief packages, is unlikely to have sufficient funds after the payment of rates to

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TERM	MEANING
	reasonably meet the cost of goods, services and financial obligations (such as normal living expenses, health care, care of dependents) that are considered essential to the functioning of that entity according to New Zealand standards; in the case of a ratepayer who is not a natural person, it is the inability, after seeking recourse from government benefits or applicable relief packages, to reasonably meet the cost of goods, services and financial obligations that are considered essential to the functioning of that entity according to New Zealand standards.
Separately Used or Inhabited Part (SUIP)	As defined in Council's most recent Annual or Long Term Plan funding impact statement. As at February 2021, SUIP includes *any portion of a rating unit inhabited or used by the owner/a person other than the owner, and who has the right to use or inhabit that portion by virtue of a tenancy, lease, licence or other agreement. For the purposes of this definition, vacant land which is not used or inhabited is not a SUIP.*

Policy details

1. Remissions

1.1. Remission of rate penalties

Objective

To enable Council to act fairly and reasonably in its consideration of rates which have not been received by Council by the penalty date. Council recognises that applying penalties may exacerbate financial hardship and that in some instances there may be a fair and reasonable explanation for delays in payment.

Conditions and criteria

This policy provides for a discretionary right to remit penalties on rates in circumstances which Council considers it fair and reasonable to do so. Remission will only be granted once in a rating year. Payment must be made within the agreed timeframe of the due date, otherwise penalties may be re-applied. Penalty remission (in full or part) will be considered for:

a. **late payment** provided that none of the previous four instalments were received late.

b. **significant family disruption** where payment has been late in the case of death, illness or accident of a family member.

c. **payment misallocation** where late payment has resulted from payments being allocated to the incorrect account due to ratepayer error (such as internet banking/account errors).

d. **payment arrangement for arrears** where the ratepayer has entered into an arrangement with Council to collect arrears and where these arrangements are fully met.

e. **temporary penalty hold** where the ratepayer or their authorised representative has contacted Council prior to a penalty date to advise that they will not have funds available to pay until after the due date and payment is subsequently made.

f. **direct debit authority** to pay rates is commenced in time for the next instalment.

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g. **non-receipt of mail** where a ratepayer claims an invoice was not received and an agreement is made to receive future rates notices by email.

h. where Council has identified that either **extreme financial hardship, exceptional circumstances** or **significant extraordinary circumstances** have occurred that warrants further leniency in relation to the enforcement of penalties that would otherwise have been payable. The criteria to be applied for significant extraordinary circumstances will be set out in a Council resolution that will be linked to the specific circumstances that have been identified by Council.

Supporting documentation required for application
Information required will depend on the circumstances and will be advised by Council staff.

1.2. Remission of small balances

Objective

To remit small balances which are uneconomical to collect.

Conditions and criteria

Council may write off the balance and penalties as it considers appropriate.

1.3. Remission of rates for community, sporting and other non-profit organisations

Objective

To assist community service, sporting and other non-profit organisations in recognition of the 'public good' contribution they make to the social and cultural wellbeing of the district where granting a rate remission will:

- assist in the organisation's survival
- make the organisation's services and/or membership more accessible to the general public.

Conditions and criteria

The conditions and criteria for the two types of rating unit categories are detailed below.

1.3.1. Community facilities owned by persons, general clubs, societies or associations

Rating unit(s) owned by a ratepayer and used for the purpose of a public hall, library, museum, art gallery, community service, healthcare or other similar institution which provide a benefit to the community as a whole may apply for a full remission of rates (with the exception of service rates) on that rating unit as follows:

- community facilities do not operate for private pecuniary profit
- community facilities do not receive any operational funding from government agencies or have any contracts for fee for service with government agencies. Community facilities which are rated for by Council are not considered to receive government funding under this policy
- community facilities operate on a voluntary basis and have no full-time or part-time paid employees or contractors operating in this capacity.

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1.3.2. Small community and sports associations with club liquor licences

Rating unit(s) owned by small community or sports associations that hold a liquor licence which provide a benefit to the community may apply for partial remission of rates (with the exception of services rates) as follows:

- community and sports associations with a membership of up to 75 full time member equivalents shall be entitled to a 25% remission
- community and sports associations with a membership of not less than 75 and no greater than 100 full time member equivalents shall be entitled to a 12.5% remission
- this policy applies to land owned by Council or owned and occupied by a charitable organisation, which is used exclusively or principally for sporting, recreation, or community purposes other than galloping races, harness races and greyhound races
- this policy does not apply to organisations operated for private pecuniary profit
- the sporting club or organisation must hold the liquor licence as an incidental activity to the primary purpose of occupancy.

In all cases, land that is used for the private pecuniary profit of any members of the society or association shall not be eligible for a rates remission.

Supporting documentation required for application	
• statement of objectives	• information on activities and programmes
• constitution or trust deed (where applicable)	• information on funding sources
• details of membership or clients (where applicable)	• other information as may be requested
• financial accounts	

1.4. Remission of rates for school wastewater charges

Objective

To provide relief and assistance to educational establishments that are subject to multiple pan charges for wastewater services as defined in the since repealed Rating Powers (Special Provision for Certain Rates for Educational Establishments) Amendment Act 2001.

Conditions and criteria

This part of the policy will apply only to educational establishments as defined in the repealed Rating Powers (Special Provision for Certain Rates for Educational Establishments) Amendment Act 2001. The Policy does not apply to any school house, or any part of a school used for residential purposes.

The calculated number of pans of any educational establishment in any one year subject to the relevant wastewater targeted rate will be the lesser of:

- the **actual** number of toilet pans in the establishment; or
- the **notional** number of toilet pans in the establishment. The notional number is calculated as one pan per 20 pupils/staff. A part thereof a notional pan will attract no charge.

Once the number of pans has been established as per the above methodology, the charging regime to apply to these educational establishments will be the same as for commercial ratepayers with multiple pans. That

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is a fixed amount per Separately Used or Inhabited Part (SUIP) of the education establishment will apply for the first two pans, with the third or more pans attracting a charge for each pan at 50% of the corresponding fixed amount.

Supporting documentation required for application
Details of the number of pans or notional number of pans in the establishment.

1.5. Remission of roading rates on other utilities with no primary address

Objective

To provide relief for rating units classified as 'Other Utilities' from roading rates because their capital values may not correlate with the demands they place on the roading network. These rating units include infrastructure assets such as District water, wastewater and stormwater supply as well as utility and railway networks. Because of their nature, these rating units do not have a primary address or have high capital values or no recorded land value.

Further, these rating units supply services and infrastructure which benefit the community and district as a whole.

Council has taken the view that applying additional charges to these rating units is likely to result in costs being passed on to consumers.

Conditions and criteria

To be considered for remission of the roading rate, rating units must:

- be classified by Council's valuation provider as 'Other Utilities'; and
- have no primary address.

Supporting documentation required for application
Confirmation from the rating information database that the property is classified "other utilities".

1.6. Remission of rubbish or recycling bin collection rates for cancellation/reduction of service

Objective

Where a ratepayer has been charged a rate for additional bin services and decides to cancel or reduce this service, they may be eligible for a remission for the part of the year where the service is cancelled or reduced.

Conditions and criteria

To be eligible for this form of remission a ratepayer must inform Council of the cancellation or reduction in bin service. Council's contractor must confirm that the bin has been returned or is no longer available for the ratepayer to use before the remission will be applied.

Any remission will apply from the first day of the month after Council's contractor has provided confirmation and apply until 30 June the following year. Remissions will be automatically offset against the ratepayers account.

Supporting documentation required for application
Information required will depend on the circumstances and will be advised by Council staff.

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1.7. Remission of rates in exceptional circumstances

Objective

To provide rates or penalty remission in other instances where Council considers relief by way of rates remission is justified in the circumstances.

Conditions and criteria

The criteria for consideration for remission of rates (in full or part) in exceptional circumstances include, but are not limited to instances where:

- there are special circumstances in relation to the rating unit, or the incidence of the rates (or a particular rate) assessed for the rating unit, which mean that the unit rates are disproportionate to those assessed for comparable rating units
- the rating unit has been completely destroyed by fire (with any remission to be applied from the first of the month following the fire).

Each circumstance will be considered by Council on a case by case basis.

Supporting documentation required for application
Information showing evidence of the exceptional circumstances (such as insurance records, photographs).

1.8. Remission of rates for extreme financial hardship

Objective

To assist ratepayers experiencing extreme financial hardship which affects their ability to pay rates.

Conditions and criteria

Each application for remission due to extreme financial hardship will be considered on its own merits. Applications for the remission of rates (in full or part) may be made by a ratepayer, or their authorised representative, where the following can be demonstrated to Council's satisfaction:

- that the rating unit to which the application relates is the primary private residence owned and occupied by the ratepayer. Companies, trusts and other similar ownership structures of these properties do not qualify for this remission
- the property is used solely for residential purposes
- the ratepayer does not own (or have an interest in) any other rating units, including investment properties (whether in the district or elsewhere)
- the ratepayer has no assets except a low value property upon which rates are owed
- the ratepayer has taken all steps necessary to claim any central government benefits or allowances the ratepayer is entitled to receive to assist with the payment of rates (including the government rates rebate scheme)
- the ratepayer does not have the financial capacity to pay their rates or the rates would create extreme financial hardship for the ratepayer.

Council may also consider whether postponement of rates is a more suitable option.

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Supporting documentation required for application
Information showing the ratepayer's financial records and commitments along with a statutory declaration from the ratepayer of their financial position (total household income and total financial position). Council may also seek independent verification from a budget advisor or other agency working with the ratepayer in considering the ratepayers position.

1.9. Remission of rates for significant extraordinary circumstances identified by Council

Objective

To assist ratepayers in response to **significant extraordinary circumstances** impacting the District's ratepayers where considered appropriate to do so.

Conditions and criteria

For this policy to apply, Council must first have identified that there have been significant extraordinary circumstances affecting the ratepayers of Southland, that Council wishes to respond to. Once significant extraordinary circumstances have been identified by Council, the criteria and application process (including an application form, if applicable), will be made available.

For a rating unit to receive a remission under this policy it needs to be an **"affected rating unit"** based on an assessment performed by officers, following guidance provided through a resolution of Council.

Council resolution will include:

a. confirmation that the resolution applies under the rates remission policy; and

b. identification of the significant extraordinary circumstances triggering the policy; and

c. how the significant extraordinary circumstances are expected to impact the community (e.g. financial hardship); and

d. the type and/or location of rating units affected by the special extraordinary circumstances for which the remission will apply to; and

e. whether individual applications are required or a broad based remission will be applied to all affected rating units or large groups of affected rating units; and

f. what rates instalment/s the remission will apply to; and

g. whether the remission amount is either a fixed amount, percentage, and/or maximum amount to be remitted for each qualifying rating unit

h. the timeframe for remission in relation to the significant extraordinary circumstances

Remissions approved under this policy do not set a precedent and will be applied for each specific event and only to properties directly affected by the event.

Explanatory Note

The specific response and criteria will be set out by Council resolution linking the response to specific significant extraordinary circumstances.

The criteria may apply a remission broadly to all rating units or to specific groups or to rating units that meet specific criteria such as proven financial hardship, a percentage of income lost or some other criteria as determined by Council and incorporated in a Council resolution.

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Council will indicate a budget to cover the value of remissions to be granted under this policy in any specific financial year.

The types of remission that may be applied under this policy include:

- *the remission of a fixed amount per rating unit either across the board or targeted to specific groups such as:*
  - *a fixed amount per residential rating unit*
  - *a fixed amount per commercial rating unit*

Council may require applicants to meet specific criteria and provide evidence of such with the application.

Council will consider who is able to make applications (e.g. owner/ratepayer/authorised agents or, in the case of a company, the directors or where the ratepayer is not the owner of the rating unit, whether the owner must also provide written approval of the application).

Supporting documentation required for application
Information required will depend on the criteria set out by Council resolution linking the response to specific **significant extraordinary circumstances.** This could include demonstrating that the ratepayer has taken all necessary steps to claim any central government benefits or allowances they are entitled to receive that would assist them to meet their financial commitments.

1.10. Grants in lieu of remissions of rates

Objective

Where the application for remission does not meet other criteria listed above for remissions, but there is a community benefit gained from providing a remission, Council or the respective community board or committee of Council, may pay the rates on behalf of the ratepayer.

Conditions and criteria

Where such an application is made to Council or the respective community board or committee of Council, the appropriate body of elected representatives may resolve to pay the rates on behalf of the applicant or pay a grant to the applicant for the amount of the rates.

Such applications will be considered on a case by case basis. Applicants must demonstrate that rates cannot fairly and reasonably be expected to be funded from other sources and that providing a grant to fund rates will result in public benefit.

Any payments made as grants in lieu of remissions of rates shall be recorded as an expense against Council or the respective community board or committee of Council.

Supporting documentation required for application
Information explaining the reasons a grant is required and any supporting documentation appropriate (such as financial accounts, funding sources, commitments, objectives, details of the public benefit which would be gained from providing a grant in lieu of remitting rates).

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2. Postponement

2.1. Postponement of rates for extreme financial hardship

Objective

To assist ratepayers experiencing extreme financial hardship which temporarily affects their ability to pay rates.

Conditions and criteria

Each application for postponement due to extreme financial hardship will be considered on its own merits. Applications for postponement of rates (in full or part) may be made by a ratepayer, or their authorised representative, where the following can be demonstrated to Council's satisfaction:

- that the rating unit to which the application relates is the primary private residence owned and occupied by the ratepayer. Companies, trusts and other similar ownership structures of these properties do not qualify for this postponement
- the property is used solely for residential purposes
- the ratepayer has not less than 25% equity in the property
- the ratepayer does not own (or have an interest in) any other rating units, including investment properties (whether in the district or elsewhere) or have a significant interest in a business or shares
- the ratepayer has no assets except a low value property upon which rates are owed
- the ratepayer has taken all steps necessary to claim any central government benefits or allowances the ratepayer is entitled to receive to assist with the payment of rates (including the government rates rebate scheme)
- the ratepayer does not have the financial capacity to pay their rates instalment or the instalment would create extreme financial hardship for the ratepayer

Council may charge an annual postponement fee on postponed rates[1] to cover, but not exceed, Council's administrative and financial costs (including interest). Postponement fees must be treated as part of the rates on a rating unit and will be set annually as part of the rates resolution.

All postponed rates shall be registered as a charge on the land under the subpart 5 of the Land Transfer Act 2017. No dealing with the land may be registered by the ratepayer while the charge is registered, except with the consent of Council.

Rates may be postponed until the earliest of the following:

- the death of the ratepayer; or
- the ratepayer ceases to own the rating unit; or
- a date specified by Council; or
- the postponed rates equate to 80% of the available equity in the property;
- a date when the ratepayer ceases to use the property as his/her permanent place of residence; or to use the property solely for residential purposes.

[1] for the period between the due date and the date they are paid

Rates postponement agreements shall not exceed six years, but the ratepayer may apply for a continuation of the postponement at the termination of the agreement.

When an application for postponement is approved, the following provisions will apply:

- postponement will first apply in the year a completed application is received.
- the amount of rates postponed will not incur additional charges
- instead of Council requiring payment of the full annual rates bill in the year in which it falls due, the ratepayer will be required to pay to Council an appropriate minimum amount determined by staff in line with Council's Delegations Manual.
- any rates postponed shall be registered as a charge on the land.

Not less than once annually every ratepayer whose rates have been postponed under this policy, will be provided with a statement showing the total annual rates currently due. This will be itemised to show year by year the total amount of the postponed rates and postponement fees.

Following the end of the financial year, a schedule of rates postponed will also be provided to Council (annually), listing all the properties for which rates postponements have been granted and which remain outstanding.

When rates are no longer eligible to be postponed on the property, all postponed rates will be payable immediately.

The postponed rates (and/or any additional charges) or any part thereof may be paid at any time. The applicant may elect to postpone the payment of a lesser sum than that which they would otherwise be entitled to have postponed under this policy.

Supporting documentation required for application
Information showing the ratepayer's financial records and commitments along with a statutory declaration from the ratepayer of their financial position (total household income and total financial position) and detailing the value of the ratepayer's property insurance and the value of encumbrances against the property including mortgages and loans. Council may also seek independent verification from a budget advisor or other agency working with the ratepayer in considering the ratepayers position. The applicants will also be encouraged to seek independent advice.

2.2. Postponement for Significant Extraordinary Circumstances

Objective

To provide a rates postponement to ratepayers experiencing financial hardship directly resulting from Significant Extraordinary Circumstances that temporarily affects their ability to pay rates.

Conditions and Criteria

For this policy to apply, Council must first have identified that there have been significant extraordinary circumstances affecting the ratepayers of Southland, that Council wishes to respond to. Once significant extraordinary circumstances have been identified by Council, the criteria and application process (including an application form, if applicable), will be made available.

For rates to be postponed, a ratepayer needs to be associated to an "affected rating unit" based on an assessment performed by officers, following guidance provided through a resolution of Council.

Council resolution will include:

a. confirmation that the resolution applies under the Rates Postponement Policy; and

b. identification of the significant extraordinary circumstances triggering the policy; and

c. how the significant extraordinary circumstances are expected to impact the community (e.g. financial hardship); and

d. the type and/or location of rating units affected by the special extraordinary circumstances; and

e. the timeframe for postponement in relation to the significant extraordinary circumstances.

Postponements approved under this policy do not set a precedent and will be applied for each specific event and only to properties directly affected by the event.

Council may charge a fee on postponed rates for the period between the due date and the date they are paid. This fee is designed to cover Council's administrative and financial costs. The fees will be set as part of Council resolution identifying significant extraordinary circumstances.

Postponed rates will remain postponed until the earlier of:

- The ratepayer/s ceases to be the owner or occupier of the rating unit; or
- A date specified by Council in a Council resolution identifying significant extraordinary circumstances.

Explanatory Note

The ratepayer must demonstrate, to Council's satisfaction that paying the rates would result in financial hardship.

Council may require applicants to meet specific criteria and provide evidence of such with the application.

Council will consider applications where the same ratepayer is liable for rates for multiple rating units. In such instances, Council will look at the collective impact to the ratepayer.

The ratepayer must be the current ratepayer/owner for the rating unit at the time significant extraordinary circumstances are identified by Council. Only the person/s entered as the ratepayer (in the case of a close company every director must sign the application form), or their authorised agent, may make an application for rates postponement for significant extraordinary circumstances that resulted in financial hardship.

Where Council decides to postpone rates, the ratepayer must make acceptable arrangements for payment of rates, for example by setting up a system for regular payments. Such arrangements will be based on the circumstances of each case.

Supporting documentation required for application
Information required will depend on the criteria set out by Council resolution linking the response to specific significant extraordinary circumstances. This could include demonstrating that the ratepayer has taken all necessary steps to claim any central government benefits or allowances they are entitled to receive that would assist them to meet their financial commitments.

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Making an application

Applications for rates remission or postponement will generally be provided in writing, unless otherwise stated.

Applications for remissions or grants in lieu of rates must be made prior to the commencement of the rating year (ideally on or before 31 March prior to the commencement of the rating year unless otherwise stated). Applications received during a rating year will be applicable from the commencement of the following rating year. Applications will not be backdated. Applications for postponement of rates due to financial hardship can be made at any time.

In subsequent years, Council will need to confirm eligibility and recipients will need to inform Council of any change in circumstances that impacts their eligibility for remission.

Remission or postponement ceases where a property is sold or ownership transferred, or where there is a change in operations or landuse (for specific remissions/postponements).

Eligibility will generally be reviewed every three years as part of the review of the policy unless stated otherwise.

All decisions made under this policy by Council, Council staff and committees of Council are final. Specific delegations to staff roles are found in Council's Delegations Manual.

Each provision above outlines the documentation that should be provided in support of any application, noting that Council may also request additional information.

Roles and responsibilities

Council's Delegations Manual (R/19/11/25582) details the specific responsibilities of Council and staff to make decisions in relation to rate remissions and postponement.

Council staff have delegated authority to make decisions on specific remissions/postponements excluding:

- **Significant extraordinary circumstances** - which can only be made by Council
- **Grants in lieu of rate remissions** - which can only be made by Council or the appropriate committee of Council or community board.

Staff from Council's water and waste teams are responsible for providing information regarding remissions for rating units that have the capacity to be connected to water and wastewater systems, but do not have a physical connection and when remissions for waste and recycling bins are required.

Associated documents

- Remission and Postponement of Rates on Māori Freehold Land Policy
- Local Government (Rating) Act 2002
- Local Government Act 2002

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Appendix A – Extract of Local Government Rating Act Schedule 1 Part 1 and 2 (as at February 2021)

Schedule 1
Categories of non-rateable land

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Part 1
Land fully non-rateable

1 Land forming part of—

(a) a National Park under the National Parks Act 1980:

(b) a reserve under the Reserves Act 1977:

(c) a conservation area under the Conservation Act 1987:

(d) a wildlife management reserve, wildlife refuge, or wildlife sanctuary under the Wildlife Act 1953.

2 Land vested in the Crown and forming part of—

(a) a flood ponding area:

(b) *[Repealed]*

(c) *[Repealed]*

(d) the bed of any navigable lake or navigable river.

Schedule 1 Part 1 clause 2(b): repealed, on 1 April 2011, by section 128 of the Marine and Coastal Area (Takutai Moana) Act 2011 (2011 No 3).

Schedule 1 Part 1 clause 2(c): repealed, on 1 April 2011, by section 128 of the Marine and Coastal Area (Takutai Moana) Act 2011 (2011 No 3).

3 Land that is—

(a) owned by a society or association of persons (whether incorporated or not); and

(b) used for conservation or preservation purposes; and

(c) not used for private pecuniary profit; and

(d) able to be accessed by the general public.

4 Land used by a local authority—

(a) for a public garden, reserve, or children's playground:

(b) for games and sports (except galloping races, harness races, or greyhound races):

(c) for a public hall, library, athenaeum, museum, art gallery, or other similar institution:

(d) for public baths, swimming baths, bathhouses, or sanitary conveniences:

(e) for soil conservation and rivers control purposes, being land for which no revenue is received.

5 Land owned or used by, and for the purposes of,—

(a) Heritage New Zealand Pouhere Taonga:

(b) the Queen Elizabeth the Second National Trust:

(c) the Museum of New Zealand Te Papa Tongarewa Board:

(d) the charitable trust known as Children's Health Camps—The New Zealand Foundation for Child and Family Health and Development:

(e) the Royal New Zealand Foundation of the Blind, except as an endowment.

Schedule 1 Part 1 clause 5(a): replaced, on 20 May 2014, by section 107 of the Heritage New Zealand Pouhere Taonga Act 2014 (2014 No 26).

Schedule 1 Part 1 clause 5(e): amended, on 30 April 2003, by section 28(1) of the Royal New Zealand Foundation of the Blind Act 2002 (2002 No 3 (P)).

6 Land owned or used by, and for the purposes of, any of the following as defined in section 10(1) of the Education and Training Act 2020:

(a) a State school:

(b) a State integrated school:

(c) a specialist school:

(d) a special institution:

(e) an early childhood education and care centre, except an early childhood education and care centre that operates for profit:

(f) a private school, except a registered school that operates for profit:

(g) an institution.

Schedule 1 Part 1 clause 6: replaced, on 1 August 2020, by section 668 of the Education and Training Act 2020 (2020 No 38).

7 Land owned or used by, and for the purposes of, an institution for the instruction and training of students in theology and associated subjects, being land that does not exceed 1.5 hectares for any one institution.

8 Land owned or used by a district health board and used to provide health or related services (including living accommodation for hospital purposes and child welfare homes).

9 Land used solely or principally—

(a) as a place of religious worship:

(b) for a Sunday or Sabbath school or other form of religious education and not used for private pecuniary profit.

10 Land that does not exceed 2 hectares and that is used as—

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(a) a cemetery, crematorium, or burial ground, within the meaning of section 2(1) of the Burial and Cremation Act 1964 (except a burial ground or crematorium that is owned and conducted for private pecuniary profit):

(b) a Māori burial ground.

11 Māori customary land.

12 Land that is set apart under section 338 of Te Ture Whenua Maori Act 1993 or any corresponding former provision of that Act and—

(a) that is used for the purposes of a marae or meeting place and that does not exceed 2 hectares; or

(b) that is a Māori reservation under section 340 of that Act.

13 Māori freehold land that does not exceed 2 hectares and on which a Māori meeting house is erected.

14 Māori freehold land that is, for the time being, non-rateable by virtue of an Order in Council made under section 116 of this Act, to the extent specified in the order.

15 Machinery, whether fixed to the soil or not, but excluding, in the case of a hydro-electric power station, everything other than the turbines, generator, and associated equipment through which the electricity produced by the generator passes.

16 Land that is specifically exempt from rates under the provisions of any other enactment, to the extent specified in the enactment.

17 Land vested in the Crown or a local authority that is formed and used for a road, limited access road, access way, or service lane.

18 Land vested in and occupied by the Crown, or by any airport authority, that is—

(a) within the operational area of an aerodrome; and

(b) used solely or principally—

(i) for the landing, departure, or movement of aircraft; or

(ii) for the loading of goods and passengers on to or from aircraft.

19 Land occupied by the New Zealand Railways Corporation, or by a railway operator, that is—

(a) part of the permanent way of the railway, being land on which is sited any railway line together with contiguous areas of land that are occupied incidentally and not otherwise used; or

(b) used, solely or principally, for the loading or unloading of goods or passengers on to or from trains situated on the railway line.

20 Land used as a wharf.

21 Land used or occupied by, or for the purposes of, an institution that is carried on for the free maintenance or relief of persons in need, being land that does not exceed 1.5 hectares for any one institution.

22 Land on which any vice-regal residence or Parliament building is situated.

23 The common marine and coastal area, including any customary marine title area, within the meaning of the Marine and Coastal Area (Takutai Moana) Act 2011.

Schedule 1 Part 1 clause 23: added, on 1 April 2011, by section 128 of the Marine and Coastal Area (Takutai Moana) Act 2011 (2011 No 3).

24 The bed of Te Whaanga Lagoon in the Chatham Islands.

Schedule 1 Part 1 clause 24: added, on 1 April 2011, by section 128 of the Marine and Coastal Area (Takutai Moana) Act 2011 (2011 No 3).

25 Structures that are—

(a) fixed to, or under, or over any part of the common marine and coastal area; and

(b) owned, or deemed to be owned, by the Crown under section 18 or 19 of the Marine and Coastal Area (Takutai Moana) Act 2011; or

(c) owned by the Crown, Te Urewera Board, or the trustees of Tūhoe Te Uru Taumatua under the Te Urewera Act 2014, but subject to note 2.

Schedule 1 Part 1 clause 25: added, on 1 April 2011, by section 128 of the Marine and Coastal Area (Takutai Moana) Act 2011 (2011 No 3).

Schedule 1 Part 1 clause 25(b): amended, on 28 July 2014, by section 138 of the Te Urewera Act 2014 (2014 No 51).

Schedule 1 Part 1 clause 25(c): inserted, on 28 July 2014, by section 138 of the Te Urewera Act 2014 (2014 No 51).

Notes:

1 For the purposes of this Part, unless the context otherwise requires,—

aerodrome has the same meaning as in section 2 of the Civil Aviation Act 1990

airport authority has the same meaning as in section 2 of the Airport Authorities Act 1966

persons in need means persons in New Zealand who need care, support, or assistance because they are orphaned, aged, infirm, disabled, sick, or needy

railway line has the same meaning as in section 4(1) of the Railways Act 2005

SOUTHLAND DISTRICT COUNCIL

railway operator has the same meaning as in section 2(1) of the New Zealand Railways Corporation Restructuring Act 1990

wharf—

(a) means any quay, pier, jetty, or other land or premises in, on, or from which passengers or goods are taken on board or landed from vessels; but

(b) does not include land that is used primarily or exclusively for private recreational or personal transport purposes.

2 For the purposes of clauses 1 and 2, **land** does not include land that is used primarily or exclusively for private or commercial purposes under a lease, licence, or other agreement.

3 For the purposes of clauses 3, 9, and 10, land must not be treated as being used for private pecuniary profit solely because charges are made for the admission to, or use of, that land if the net proceeds of the charges are applied,—

(a) in the case of a local authority, as part of the local authority's revenues:

(b) solely for the purposes of the society, organisation, association, or administering body of a reserve that makes those charges, and no part of the charges is distributed as profit to any individual.

4 For the purposes of clause 6, land must be treated as being used for the purposes of a school, institution, or centre described in that clause if—

(a) it is used solely or predominantly as residential accommodation for any principal, teacher, or caretaker; and

(b) it is let at a discounted or subsidised rent.

5 For the purposes of clauses 18 to 20, **land** does not include land that is used—

(a) for administrative purposes; or

(b) for the purposes of parking, the storage of freight or machinery, maintenance, cleaning, freight consolidation, passenger waiting areas, and the buying and selling of tickets.

6 For the purposes of clause 21, an institution must be treated as being carried on for the free maintenance and relief of the persons to whom that clause applies if—

(a) those persons are admitted to the institution regardless of their ability to pay for the maintenance or relief; and

(b) no charge is made to those persons or any other persons if payment of the charge would cause those persons to suffer hardship.

Schedule 1 Part 1 note 1 **railway line**: substituted, on 20 July 2005, by section 103(3) of the Railways Act 2005 (2005 No 37).

Part 2
Land 50% non-rateable

1 Land owned or used by a society incorporated under the Agricultural and Pastoral Societies Act 1908 as a showground or place of meeting.

2 Land owned or used by a society or association of persons (whether incorporated or not) for games or sports, except galloping races, harness races, or greyhound races.

3 Land owned or used by a society or association of persons (whether incorporated or not) for the purpose of any branch of the arts.

Notes:

For the purposes of this Part, unless the context otherwise requires,—

land does not include land used for the private pecuniary profit of any members of the society or association

land, in clause 2, excludes land in respect of which a club licence under the Sale and Supply of Alcohol Act 2012 is for the time being in force.

Schedule 1 Part 2 Notes **land**: amended, on 18 December 2013, by section 417(1) of the Sale and Supply of Alcohol Act 2012 (2012 No 120).

Compare: 1988 No 97 Schedule 1, Schedule 2

Submission to Ministry of Business, Innovation and Employment: "Supporting sustainable freedom camping in New Zealand"

Record No: R/21/4/16893
Author: Michael Sarfaiti, Environmental Health Manager
Approved by: Fran Mikulicic, Group Manager Environmental Services

☒ Decision ☐ Recommendation ☐ Information

Purpose

1 This report presents a draft submission for Council's consideration. Submissions are due to the Ministry of Business, Innovation and Employment (MBIE) by 16 May 2021.

Executive Summary

2 The Government is consulting on how to make freedom camping in New Zealand more sustainable. The draft submission in this report is presented for Council's consideration.

Recommendation

That the Council:

a) Receives the report titled "Submission to Ministry of Business, Innovation and Employment: "Supporting sustainable freedom camping in New Zealand"" dated 29 April 2021.

b) Determines that this matter or decision be recognised as not significant in terms of Section 76 of the Local Government Act 2002.

c) Determines that it has complied with the decision-making provisions of the Local Government Act 2002 to the extent necessary in relation to this decision; and in accordance with Section 79 of the act determines that it does not require further information, further assessment of options or further analysis of costs and benefits or advantages and disadvantages prior to making a decision on this matter.

d) Agrees to authorise that the Manager of Environmental Health forward the submission (attachment A of the report), with any amendments agreed by the meeting.

Background

3 Council's Freedom Camping Bylaw has the following characteristics:

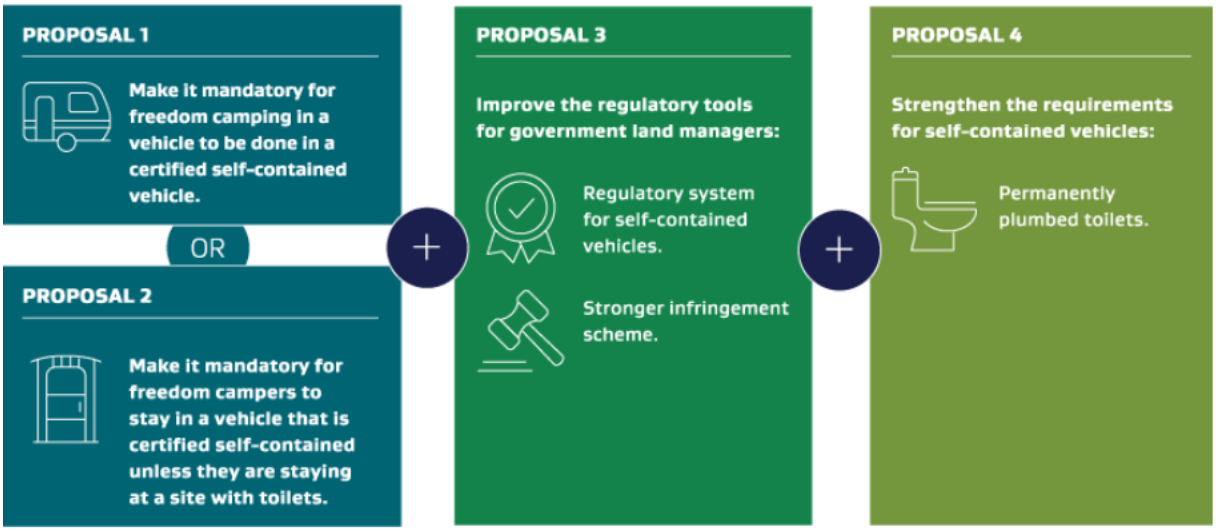
- Local rules were developed in consultation with each Community Board and Community Development Area Subcommittees (of the time). This is why some parts of the District are prohibitive, others permissive. The Council at the time was not seeking a one-rule-for-all approach.

- The Bylaw has a series of maps that define these rules (mostly townships), along with some District wide rules in Schedule 1 of the Bylaw. The default rule in the District is that freedom camping is permitted, except where it is restricted or prohibited as advised in the maps or Schedule 1.
- While the Bylaw is permissive, it does have a freedom camping designated site approach; and this is the view that is presented to campers on their apps. That is, the apps advise of designated sites, and this approach has worked well.

4 The Government is consulting on how to make freedom camping in New Zealand more sustainable. The Government recognises that many New Zealanders enjoy travelling around the country, staying outside established campgrounds, but that the increasing number of freedom campers has raised concern from some communities around freedom campers' cumulative impact on the environment, and the cost to host them.

5 The Government considers that while the borders are closed to international visitors, now is the time to address some of the systemic issues facing freedom camping.

6 The discussion document is in **Attachment B**. The consultation document summarises the proposals as follows:



Issues

7 The issues in the consultation document and the draft submission are summarised here, the authors views expressed in the submission in (brackets):

- Is vehicle-based freedom camping a problem (yes; but managed through its bylaw, ambassadors etc)
- Proposal to make it mandatory for vehicle-based freedom campers to use a certified self-contained vehicle (not supported, as Council wants the ability to be permissive where a local community supports freedom camping)

- Proposal to make it mandatory for freedom campers to stay in vehicles which are certified self-contained, unless they are staying at a site with toilet facilities (support, as long as this does not include traditional responsible kiwi camping)
- Proposals to improve the regulatory tools for government land managers (all fully supported to improve compliance)
- Self-containment standards being strengthened (neutral, not a particular concern in the District to date)
- Homelessness (these groups should stay in camping grounds, and do not support Council's designated sites being used for this purpose)

Factors to Consider

Legal and Statutory Requirements

8 There are no considerations in making a submission.

Community Views

9 This MBIE consultation is open to the public.

Costs and Funding

10 The draft submission supports ongoing Tourism Infrastructure Funding (TIF) - type funding.

Policy Implications

11 Changes to freedom camping regulation by the Government may well result in the Council choosing to complete an early review of the Freedom Camping Bylaw (current review date is 2025).

Analysis

Options Considered

Option 1 – Submit a submission, with any amendments seen fit

Advantages	*Disadvantages*
• Council's views may be considered by the Government	• None

Option 2 – Do not submit

Advantages	*Disadvantages*
• None	• Lost opportunity

Assessment of Significance

12 Not significant.

Recommended Option

13 Option 1.

Next Steps

14 The submission will be forwarded to MBIE.

Attachments

A Submission form supporting sustainable freedom camping ⇩
B MBIE discussion document ⇩

Supporting Sustainable Freedom Camping in Aotearoa New Zealand – Submission Form

Your submission can be returned by email to responsiblecamping@mbie.govt.nz. Submissions are due by midnight on Sunday 16 May.

Your details

What is the name of the person making this submission?
Michael Sarfaiti
If you are submitting on behalf of an organisation, what is the name of that organisation?
Southland District Council. Council approved this submission by resolution on 5 May 2021.
Is it okay for your organisation's details to be published if we publish which organisations made a submission, or include part of your submission in the summary of submissions?
☒ Yes, you can publish my organisation's details with information from my submission. ☐ No, keep my organisation's details confidential.
Can we use information in your submission as a case study in the summary of submissions?
☒ Yes, you can include information from my submission as a case study in the summary of submissions. ☐ No, keep my information confidential.
Please provide us with your email address in case we need to contact you about your submission.

Email	michael.sarfaiti@southlanddc.govt.nz

What sector(s) does your submission most closely relate to, if applicable? For example, the sector in which you may work or operate, or which you represent.	
☐ Accommodation provider	☐ Other tourism business
☐ Rental vehicle business	☐ Non-tourism business
☐ Iwi, hapū or Māori organisation	☒ Local Government
☐ Individual or camper	☐ Club or club representative (eg camping club)
☐ Other _____ (*please specify*)	
☐ N/A	

Context to Supporting Sustainable Freedom Camping in Aotearoa New Zealand

1.1	**How much do you agree that certain types of vehicle-based freedom camping is a problem?** Please write a (Y) next to the option which applies to you			
Strongly agree (Y)	Agree	Neutral	Disagree	Strongly disagree

1.2	**What are your views on freedom camping in vehicles?** When answering this question you may like to think about: • Is vehicle-based freedom camping an issue in your area? • Have you observed any specific issues? • Are there specific behaviours which impact on your use of local amenities/infrastructure? • What benefits does vehicle-based freedom camping provide for your region?

It was necessary for Council to introduce a bylaw to regulate freedom camping in the District because of serious problems. For example, a prohibition of freedom camping in the Te Anau area was introduced due to the serious problems from freedom campers in that area, such as campers camping in inappropriate areas, litter and waste, and abuse of public toilet facilities (e.g. hanging up washing there or doing dishes in the toilet hand basins). Camping ground operators continue to have frustrations with freedom campers using their facilities clandestinely.

However Council's management of freedom camping (bylaw, ambassadors, designated sites and facilities) has meant that the problems from freedom camping are not significant.

Other problems include (some prevented through management methods):

- Over-crowding of Council designated sites
- Camping beside sensitive sites, e.g. adjacent to a playground
- Visual amenity and blocking views – a row of campers interrupting the view of a scenic area
- Cost of maintaining designed sites – rubbish, water, waste water, toilet maintenance, ambassador costs
- The fire risk to vegetation from campers lighting fires, the former Southern Rural Fire Authority being very concerned about this
- Restricting access to local recreational users of a location

Benefits include:

- Supporting local businesses
- Spending more time in the region, and subsequently spending more there
- Adding some vibrancy to an area
- Increased safety in the middle of the town from camper presence, as advised by representatives of Lumsden

2.1	**How much do you support the proposal to make it mandatory for vehicle-based freedom campers to use a certified self-contained vehicle?** Please write a (Y) next to the option which applies to you			
Strongly agree	Agree	Neutral	Disagree (Y)	Strongly disagree

2.2	**Do you support this proposal?** When answering this question you may like to think about: • Do you consider this option will improve camper behaviour? • Will this option support or improve tourism outcomes in your region? • Will this option decrease pressure on the environment and local government infrastructure? • Are there impacts of this proposal that you are concerned about?
The Council wants the flexibility to have local rules that permit non-self-contained camping, should the local communities support it, and so rather supports Proposal 3.1. Also, the demands on infrastructure may not be that affected, because all campers will continue to use public toilets if they are still available.	

2.3	**How might this proposal impact you?** When answering this question you may like to think about: • Will this proposal increase or decrease the likelihood of you camping? • Will this proposal have a direct financial impact on you or your business? ○ If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you. • Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?
This will mean that the Council's designated sites for non-self-contained camping to be redundant, as very little of this camping is in tents.	

2.4	**What things should Government consider to implement this option?** When answering this question you may like to think about: • What exceptions should Government allow under this proposal? • Do you have any ideas about how this proposal could be implemented? • Should this option be considered alongside other options proposed in this discussion document?
The Council does not support implementing this proposal.	

3.1	**How much do you support the proposal to make it mandatory for freedom campers to stay in vehicles which are certified self-contained, unless they are staying at a site with toilet facilities (excluding public conservation lands and regional parks)?** Please write a (Y) next to the option which applies to you

Strongly agree **(Y)**	Agree	Neutral	Disagree	Strongly disagree

3.2	**Do you support this proposal?** When answering this question you may like to think about: • Do you consider this option will improve camper behaviour? • Will this option support or improve tourism outcomes in your region? • Will this option decrease pressure on the environment and local government infrastructure? • Are there impacts of this proposal that you are concerned about?

The Council already has this approach and wants to continue.

Southland District's experience is that even self-contained vehicles users prefer to use public toilets.

More users of self-contained vehicles reduces the fire risk concern, with cooking facilities being on board.

3.3	**How might this proposal impact you?** When answering this question you may like to think about: • Will this proposal increase or decrease the likelihood of you camping? • Will this proposal have a direct financial impact on you or your business? ○ If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you. • Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

If NZ moves towards a situation where there are few non-self-contained freedom camping options, then will reduce the number of campers that stay at designated sites in the Southland District.

However, this could also increase the attractiveness of our areas, with less visual amenity problems (e.g. campers spilling their activities outside their vehicles).

3.4	**What things should Government consider to implement this option?** When answering this question you may like to think about: • What do you think is required to achieve this option? • What exceptions should Government allow under this proposal? • How far from toilet facilities should a person be able to freedom camp if not in a vehicle with a toilet? eg, 100 metres, 200 metres? • Should this option be considered alongside other options proposed in this discussion document?

The Council does support the designated-site-only approach for tourists, as long as this somehow does not apply to traditional kiwi camping (e.g. scouts, whitebaiters, hunting trips, family camping). Possible options of achieving this is an exemption in the Freedom Camping Act, or a defence in the Act, or some other mechanism. NOTE the Southland District Freedom Camping Bylaw already permits freedom camping generally, with a series of maps that restrict freedom camping mainly in townships. This approach means

that there are no legal problems for traditional kiwi camping in the Southland District, because there are no bylaw restrictions for areas used for kiwi camping.

Council's vision for freedom camping in its District has these characteristics:

1. Campers are directed to approved sources of information (especially apps), and any apps that want to be approved must agree to no user uploads of unapproved sites. Council understands that almost all campers use apps and so approved apps must be accurate and suitable.
2. These apps show the locations of approved designated sites
3. These apps having the features of:
    a. Being able to tap on an approved designated site, with the app then showing livestreaming camera views of designated sites, the cameras using artificial intelligence to determine if the site is full
    b. Giving campers the location of the nearest camping grounds, should the designated site become full nearing arrival
    c. The nearest camping grounds advising if they have vacancies, with camping ground operators uploading their status to these apps
    d. Locations of dump stations, recycling and rubbish facilities, and **tourist attractions.**
4. Self-contained only sites are used by vehicles that are actually self-contained, and easily verified to be so, for example scannable warrants
5. Traditional responsible kiwi camping is not captured by its Freedom Camping Bylaw (or the Freedom Camping Act)
6. The Council can have designated sites for non-self-contained camping if it chooses to (always beside toilets)
7. The Government continues to contribute towards the maintenance of designated sites (rubbish, water, waste), signs and educational material, and ambassadors.

The best way to locally educate is through locally appointed ambassadors. While signs have their place, so often an excuse is that "There is no sign saying I can't camp". The best education is face to face with campers. Ambassadors also:

- remove small rubbish deposits, which reduces the likelihood of continued deposits in those areas.
- manage campers at designated sites, e.g. moving vehicles so that more can fit in, and managing overcrowding generally.

Council supports the continued TIF funding of ambassadors. If the Government stops this funding, then it is essential that Council can cost-recover via infringements.

4.1	**How much do you support the proposals to improve the regulatory tools for government land managers?** Please write a (Y) next to the option which applies to you

Strongly agree (Y)	Agree	Neutral	Disagree	Strongly disagree

4.2	**Do you support this proposal?** When answering this question you may like to think about: • Are there any specific parts of this proposal you support or propose? • Do you consider this option will improve camper behaviour? • Will this option support or improve tourism outcomes in your region? • Will this option decrease pressure on the environment and local government infrastructure? • Are there impacts of this proposal that you are concerned about?

The Council fully supports this proposal:

1. That infringement fines must be paid prior to leaving NZ
2. Vehicle confiscation for serious non-compliance
3. Introducing a new regulatory agency for self-contained vehicles
4. Allowing Councils to enforce rules on other Government owned land

The Council believes that this will improve compliance at its designated sites and reduce the problems from freedom camping.

Further items for MBIE's consideration:

1. A system that allows the ambassador to easily walk along a row of vehicles to determine that they are compliant. For example, a scannable bar code on the warrant that the ambassador can scan.
2. Re-start funding of the former Ambassador app, that all Ambassadors can use.
3. Permitting Councils to enforce rules on private land. For example some campers have been known to camp up driveways, and also there is a hotspot in the Te Anau area owned by a company.

4.3	**How might this proposal impact you?** When answering this question you may like to think about: • Will this proposal increase or decrease the likelihood of you camping? • Will this proposal have a direct financial impact on you or your business? ○ If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you. • Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

No comments.

4.4	**What things should Government consider to implement this option?** When answering this question you may like to think about: • What would you like to see in practice?

	• Should this option be considered alongside other options proposed in this discussion document?
Council is aware that Queenstown Lakes also uses wheel clamps. MBIE should consider whether that is a reasonable option that could be applied nationally.	
4.5	**What would be an appropriate penalty?** When answering this question you may like to think about: • Should non-compliant vehicles be confiscated? If so, under what conditions? • If vehicles are confiscated, what conditions should be placed on returning the vehicle? • Should fines be similar to those for not holding a valid Warrant of Fitness for a motor vehicle? • What levels should fines be set at? • Who should collect a fine?
Councils, rather than the Government, must collect the fees for the fines – as a mechanism to cover the costs of providing ambassador services. In practice fines are only issued to campers that are camping in a prohibited area. Council suggests that a three strikes approach could be adopted, e.g. three infringements (on three separate occasions) within a 6-month period results in impounding. The existing fee of $200 is considered appropriate.	

5.1	**Do you think that the requirements for self-containment should be strengthened?** Please write a (Y) next to the option which applies to you		
Yes **(Y)**	Neutral	No	
5.2	**Is the current standard fit for purpose?** When answering this question you may like to think about: • Should there be a requirement that self-contained vehicles have fixed toilets? • Should there be specific reference to the types of vehicles that can be self-contained?		
Council supports strengthening requirements, including a requirement to have fixed toilets. This requirement should apply to any vehicle camping in a self-contained only site.			
5.3	**Who should certify to the Standard?** When answering this question you may like to think about: • Should any Plumber registered under the Plumbers, Gasfitters and Drainlayers Act 1976 be able to certify to the Standard, or should certifiers be separately recognised and licensed? • Once a vehicle has passed its initial certification, should other entities be able to re-certify it?		
Registered plumbers are suitable, provided the Government does not have any evidence that affect this confidence.			

6.1	**What transition arrangements should be in place?** When answering this question you may like to think about: • How long should Government give people to upgrade or dispose of their vehicles? • Should currently certified self-contained vehicles be exempt from any new rules? • Are there any other transition arrangements we should consider?

The Council acknowledges that this is a big undertaking. Council views this as being important and should not be long drawn out, yet understands that any transition has to be reasonable.

The Council's mind is drawn to Environment Southland's transitional arrangements to approved wood burners:

https://www.es.govt.nz/environment/air

On this webpage is a table outlining the transition, that has transitional arrangements that depend on when the burner was installed. The Council suggests a similar structure for self-contained vehicles, with the aim of all vehicles being upgraded within around 3 years, or such sooner timeframe that MBIE considers to be reasonable.

6.2	**How could Government ensure vulnerable groups are not further disadvantaged?** • Could Government make homelessness exempt from any new regulatory system? What might this look like?

In the Southland District, alternative lifestyle is the more common cause of people living in buses and similar, not homelessness per se.

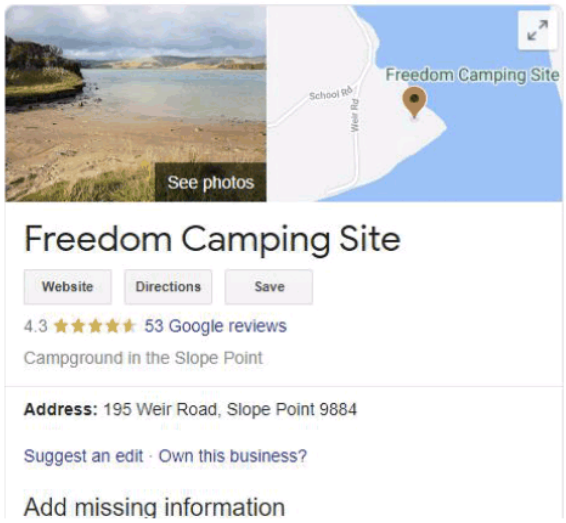
Council suggest that this kind of accommodation is captured under this legislation. The Council does not support its designated sites being used by homeless or alternative lifestyle people.

It would be preferable for homeless people to stay at commercial camping grounds, even though the Camping Ground Regulations do not currently permit long term accommodation.

7.1	**Is there anything else on the proposed changes or discussion document you would like to mention?**

Council also wishes to raise the following matters:

1. Council would like to see campervan hirers prohibited from irresponsible promotions and slogans. For example, the painted wording on some campervans can be considered to be offensive by some, and also an example of an irresponsible promotion of a free day's hire if the customer posing naked beside the vehicle (clearly inappropriate near a public area). Compare the Sale and Supply of Alcohol Act that has wording around responsible and irresponsible promotions.
2. There is an urban legend that vehicles should be at least 3 meters apart to avoid fire risk. Council understand this to be false, and this could be clarified. Note in Lumsden, the designated sites are in a carpark with painted lines.
3. These changes could result in more campers trying to find accommodation late at night, while fatigued, and causing traffic accidents. The Act already exempts camping to avoid driver fatigue, and this key message needs to be promoted. We don't want this provision being abused by campers, and the Ambassador app could keep track of these campers.
4. Can the Government use its influence on major websites such as Google that have freedom camping information, for example an office in the Government that can act as a liaison. For example, Council does not wish for the site below (Weirs Beach) to be promoted as a freedom camping area, but Google is unresponsive to requests from Council officers:



MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT
HĪKINA WHAKATUTUKI

Supporting Sustainable Freedom Camping in Aotearoa New Zealand

Proposed changes to support effective management of freedom camping in New Zealand

Discussion Document
April 2021

LSE 6298

New Zealand Government

MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT
HĪKINA WHAKATUTUKI

Ministry of Business, Innovation and Employment (MBIE)

Hīkina Whakatutuki - Lifting to make successful

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Foreword from the Minister of Tourism

NOKU E TAKAHI ANA I TE MATA O AOTEAROA, ME TOITU TE WHENUA, TE MOANA, ME TE TAIAO ME TAE MAORI MAI, ME HOKI MAORI ATU.

WHILE TRAVELLING IN NEW ZEALAND, I WILL CARE FOR LAND, SEA AND NATURE, TREADING LIGHTLY AND LEAVING NO TRACE.

— Tiaki Promise

One of my major priorities as Minister of Tourism is to ensure that we send a very clear message about our nation's values to all who wish to visit and travel around our beautiful country. Our values are a part of our overall visitor proposition, so we must safeguard our clean green 100% Pure New Zealand brand and promise.

For tourism to be successful, it must operate with the social licence granted by communities. If that social licence disappears then we will inevitably fail to deliver a high value visitor experience. The actions of some freedom campers who travel around our wonderful country in vehicles with a sleeping platform but without toilet facilities have strained social licence for freedom camping and our ability to deliver on our brand promise. This must change.

I believe the Government needs to act before the borders reopen to address some of the systemic issues New Zealand was facing prior to COVID-19 in terms of our brand erosion and loss of social licence. As we begin to reopen New Zealand to the world we need to make sure that we build back better. The Government supports the tourism industry's drive to be sustainable and resilient in the face of the challenges presenting in the 21st century.

I would like to ensure that we can increase the value provided by visitors to New Zealand, while simultaneously delivering on the 'Brand New Zealand' promise. I would like visitors to be welcomed into communities across New Zealand, to receive that 'world famous' hospitality that we are renowned for, and to have their expectations exceeded. This vision can only be delivered if we:

- protect and restore our natural environment
- ensure that we can deliver high quality tourism experiences
- have the social licence to operate in communities across New Zealand.

Improving the sustainability of freedom camping in New Zealand is one area of priority for me. To achieve this vision every visitor that camps in New Zealand must be a responsible camper. As Minister of Tourism and a Member of Parliament, one of the most consistent complaints I have heard relates to freedom camping. These complaints include poor behaviour, waste and litter, and overcrowding.

Improving the sustainability of freedom camping is also one of the four priorities for tourism set out by the Parliamentary Commissioner for the Environment in his report *Not 100% - But Four Steps Closer to Sustainable Tourism*. His report notes that the Government's efforts to address freedom camping issues through more facilities and education campaigns have not resolved the issues noted above.

As such, we need to make sure that the costs of freedom camping are not borne by local councils and communities. We also need to ensure that we have the infrastructure and systems in place to support people to camp responsibly.

I believe that the most effective method to achieve this is a package of the proposals in this document: make it mandatory for vehicle based freedom campers to use a certified self-contained vehicle, improve the regulatory tools for government land owners, and strengthen the requirements for self-contained vehicles. While I acknowledge this may impact some New Zealanders and a few businesses, and change the nature of freedom camping for some, I consider it will address some of the issues facing communities and ratepayers as a result of vehicle based freedom camping, particularly when the border is reopened to international visitors.

This document also presents an alternative proposal, which would make it mandatory for freedom campers to be in a certified self-contained vehicle, except in places which have toilet facilities. I am also open to other proposals that might achieve my objective and would like to hear from the public about these.

To protect and deliver on New Zealand's brand proposition, I would like change to occur fast. It is my aim to have a new regime in place by 1 January 2022. This will ensure that the issues of the past do not have an opportunity to repeat when the international visitor market returns.

I am interested in receiving feedback from all stakeholders, including local government, the tourism industry, community interest groups and the wider public. Supporting responsible camping requires input from everyone, and I look forward to understanding your views on the proposals in detail.

Hon Stuart Nash

Minister of Tourism

Executive summary

Responsible camping has a long history in Aotearoa New Zealand. Many New Zealanders enjoy travelling around the country, staying outside established campgrounds – and some see it as an important part of their birthright as New Zealanders to camp around New Zealand at low or no cost. Responsible campers come in all shapes and sizes: some choose to camp as an affordable way to have a holiday at a favourite campground; some spend their retirement touring the country in a motor caravan; and others camp while hunting or fishing.

However, in recent years the increasing number of freedom campers has raised concern from some communities around freedom campers' cumulative impact on the environment, and the cost to host them. In particular, this concern has focused on the subset of freedom campers who stay in cars, or vans with sleeping platforms, that are not self-contained. This is impacting communities' attitudes towards visitors and their willingness to host them – and impacting on the social licence for tourism.

Environmental concerns and low community support for this form of freedom camping puts at risk New Zealand's reputation as a destination that delivers a sustainable, high quality visitor experience. Meanwhile, there are ongoing costs for communities and taxpayers to manage the immediate impacts of the inappropriate behaviour by some freedom campers, which include dealing with waste and litter, providing education and undertaking enforcement activities.

The Government considers that now is the time for change. While the borders are closed, there is an opportunity to address some of the systemic issues arising from freedom camping, by introducing a new system that is better managed, delivers a high quality experience for domestic and international visitors, and which ensures the costs of freedom camping are not unfairly placed on the communities which host them.

This document presents four proposals for consideration:

1. Make it mandatory for freedom camping in a vehicle to be done in a certified self-contained vehicle.
2. Make it mandatory for freedom campers to stay in a vehicle that is certified self-contained, unless they are staying at a site with toilet facilities (excluding public conservation lands and regional parks).
3. Improve the regulatory tools for government land managers.
4. Strengthen the requirements for self-contained vehicles.

Details on how you can submit on the proposals in this document are found on page 8, and online at: www.mbie.govt.nz/have-your-say/supporting-sustainable-freedom-camping-in-aotearoa-new-zealand

This website also includes information on public meetings MBIE is holding to discuss the proposals.

The issue and why we are consulting

The Government is concerned about the impact on local communities, our environment and on our international tourism brand caused by freedom campers staying in cars, or vehicles with sleeping platforms, that are not self-contained and who do not camp responsibly. While the expectation is that all campers are responsible campers – in that they obey the rules of where they visit and dispose of their waste appropriately – there are still far too many instances of people disregarding their obligations and responsibilities. This has both a local effect on environment and amenity, and a cumulative national impact on the social license for tourism, and New Zealand's tourism brand.

The current approach to supporting freedom camping is not adequate. We need to strengthen the legislation so that our minimum expectations of people are supported by the rules and tools to enforce them. This discussion document seeks feedback on some proposals for strengthening our regulatory system for freedom camping, which are outlined on the following pages.

What is responsible camping?

Responsible camping includes all types of camping in Aotearoa New Zealand, whether paying for a site or camping for free. It is about doing so responsibly, disposing of waste appropriately and respecting the local environment.

What is freedom camping?

Freedom camping is defined in the Freedom Camping Act 2011 (the Act). It means camping within 200 metres of a motor vehicle accessible area or the mean low-water springs line of any sea or harbour, or on or within 200 metres of a formed road or a Great Walks Track, using one of more of the following:

- a tent or other temporary structure
- a caravan, or
- a car, campervan, house truck, or other motor vehicle.

It does not include staying at a camping ground, temporary or short-term parking of a motor vehicle, day trips, or resting or sleeping at the roadside to avoid driver fatigue.

The scope of this discussion document

The Government is interested to hear your views on how it can support vehicle based responsible camping in New Zealand – for both New Zealanders and international visitors. We seek your feedback on four proposals to support responsible camping in New Zealand. These are:

1. Make it mandatory for freedom camping in a vehicle to be done in a certified self-contained vehicle.
2. Make it mandatory for freedom campers to stay in a vehicle that is certified self-contained, unless they are staying at a site with toilet facilities (excluding public conservation lands and regional parks).
3. Improve the regulatory tools for government land managers.
4. Strengthen the requirements for self-contained vehicles. Requirements for self-contained vehicles are currently set out in the voluntary New Zealand Standard, NZS 5465:2001 *Self containment of motor caravans and caravans* (which is more commonly known as the Self Contained Vehicle Standard - SCVS).

A package based on some or all of these proposals is likely to be most effective in reducing the impacts of freedom camping on communities and the natural environment.

The Government is also interested to understand your views on how proposals could be implemented. This includes feedback on:

- features of any new systems that could be put in place and that would, for example, make it easier to comply or to enforce the rules
- what penalties for non-compliance should be
- the economic cost borne by those who would be impacted by the proposals.

Out of scope

We are not seeking feedback on the Government's broader approach to supporting responsible camping. This includes:

- exploring wider reforms to the Freedom Camping Act 2011
- reviewing the Camping-Ground Regulations 1985, which apply to commercial campgrounds
- any feedback or views on local bylaws or notices made under the Freedom Camping Act 2011, or which are currently being consulted on by local authorities. or the Department of Conservation.

How to have your say

You have an opportunity to tell us what you think of the proposals to improve responsible camping by providing feedback on the matters raised in this discussion document. You are welcome to make submissions on some or all of the discussion questions set out in this document, and/or to raise any other relevant points.

How to comment on this discussion document

The Ministry of Business, Innovation and Employment (MBIE) invites written comments on the proposals in this document. A submission may range from a short letter on one issue to a detailed response covering multiple issues. Please provide relevant facts, figures, data, examples and documents where possible to support your views. You can:

- Complete your submission on the MBIE website: www.mbie.govt.nz/have-your-say/supporting-sustainable-freedom-camping-in-aotearoa-new-zealand.
- Email a submission to us at: responsiblecamping@mbie.govt.nz
- Mail your submission to us at:
  Ministry of Business, Innovation and Employment
  15 Stout Street
  PO Box 1473, Wellington 6140
  Attention: Responsible Camping Submissions

If possible, we appreciate receiving submissions electronically. If emailing an attachment, we prefer a Microsoft Word or searchable PDF format.

MBIE will publish a summary of submissions

After submissions close, MBIE will publish a summary of submissions on our website at www.mbie.govt.nz. We will not be making any individual submissions public. Should any part of your submission be included in the summary of submissions, MBIE will seek your permission to publish your information, and ensure it does not refer to any names of individuals.

When businesses or organisations make a submission, MBIE will consider that you have consented to the content being included in the summary of submissions unless you clearly state otherwise. If your submission contains any information that is confidential or that you do not want published, you can say this in your submission.

The Privacy Act 2020 applies to submissions and survey responses. Any personal information you supply to MBIE in the course of making a submission will be used by MBIE only in conjunction with matters covered by this document.

Submissions and survey responses may be the subject of requests for information under the *Official Information Act 1982* (OIA). Please set out clearly if you object to the release of any information in the submission, and in particular, which part (or parts) you consider should be withheld (with reference to the relevant section of the OIA). MBIE will take your views into account when responding to requests under the OIA. Any decision to withhold information requested under the OIA can be reviewed by the Ombudsman.

What happens next

MBIE will analyse all submissions received and then report back to the Minister of Tourism on the feedback, with recommendations for his consideration. Your submission will help inform policy decisions to improve responsible camping.

Freedom camping in Aotearoa New Zealand

Freedom camping has a long history in Aotearoa New Zealand. Many New Zealanders enjoy travelling around the country, staying outside established campgrounds – and some see it as an important part of their birthright as New Zealanders to camp around New Zealand. Freedom camping is also a popular way for many international visitors to travel around New Zealand. Prior to COVID-19, an estimated 154,000 international visitors spent part of their trip freedom camping, representing around 63% of all people who freedom camped in the 2019 calendar year.

Freedom camping has, at times, received mixed levels of support from different communities around New Zealand. In recent years, the increasing number of freedom campers, and their cumulative impact, has raised concerns in some communities around freedom campers' environmental impact and cost to host them. This predominantly (but not exclusively) concerns those tourists who travel in vehicles with sleeping platforms but without a toilet.

Freedom camping complements the camping system in New Zealand more broadly, with people who want access to greater amenities (such as bathrooms, power, a full kitchen or laundry) choosing to camp at either a commercial campground or a Department of Conservation campground.

What are the different ways people camp?

Tents and other temporary structures: Outdoor enthusiasts, like trampers and cyclists, may travel light carrying a tent as their accommodation. Tents are also often seen as a family holiday option, and are used in a variety of campgrounds.

Vehicles that are not self-contained: A wide range of vehicles are used for camping, from caravans through to large cars and vans. These vehicles are often basic, and typically feature fixed or removable portable sleeping facilities, and cooking facilities. These vehicles typically do not contain toilet facilities, so campers must either use facilities provided on-site, or go outside where no facilities are available. Some of these vehicles are in private ownership. While the precise number is not known, an estimated 55,000 vehicles could be converted to self-contained.

Self-contained vehicles: These vehicles conform to a minimum standard for sanitary fixtures and fittings, including having a toilet, and being able to hold three days of fresh water and waste water (see page 26 for more details). Under the current New Zealand Standard for self-contained vehicles, vehicles that are able to meet the minimum requirements range from basic vans with portable toilets, to premium motor vehicles with hot showers, sleeping platforms, fixed toilets and cooking facilities. However, even if a vehicle is self-contained, not all the installed facilities may be used all the time; for example, it is still fairly common for showering and cooking to take place outside vehicles. At least 68,000 self-contained vehicles are in private ownership; at least 5,000 are in the rental fleet.

People can camp in a range of places

Designated freedom camping sites provide low levels of service, sometimes have no toilet facilities and/or are limited to self-contained vehicles only. Commercial campgrounds and some Department of Conservation campgrounds provide more amenities – for example: power, kitchen facilities, toilets and hot showers, for which fees are charged.

Many people also choose to camp on private land, in the back country or on conservation land. However, freedom camping cannot be done where a council bylaw or Department of Conservation notice prohibits this.

Benefits of freedom camping to New Zealand

Freedom camping can be a way to attract visitors to less visited destinations, and to provide an accommodation option in places that have less traditional tourism accommodation but still want to attract visitors.

Research published by MBIE in 2020 found that people who choose to freedom camp stay longer and, in total, spend more on average than other visitors, but spend less per day.[1] Spending by people who freedom camped over the 2019/20 summer season, excluding vehicle purchase or hire costs, was estimated as follows:

- Domestic freedom campers spent an average of $545 per person per trip, or $43 per day.
- International campers who purchased their own vehicle spent an average of $7,891, or $38 per day.
- International visitors who hired a budget vehicle spent $3,691, or $78 per day.
- International visitors who hired a premium vehicle spent $2,687, or $83 per day.

The average spend by international visitors in New Zealand for any purpose was $3,404 per trip, or $193 per day.[2]

Both international and domestic freedom campers reported staying at a range of accommodation providers during a trip, with the most common being designated freedom camping sites, commercial campgrounds and New Zealand Motor Caravan Association parks.

1 See https://www.mbie.govt.nz/immigration-and-tourism/tourism/tourism-projects/responsible-camping/results-of-the-201920-summer-research-into-responsible-camping/ for more information.
2 Data drawn from the International Visitor Survey – Visitor Expenditure Year End December 2019. See http://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7571.

Introduction of the Freedom Camping Act 2011

The Freedom Camping Act 2011 (the Act) was introduced ahead of the 2011 Rugby World Cup to help local authorities and the Department of Conservation better manage freedom camping. At the time, the Government was concerned that without the Act, there would be insufficient controls to support responsible behaviour from the increasing number of visitors.

Under the Act, freedom camping:

- is free, that is, the camper does not pay a fee for staying there
- is usually in a vehicle or tent
- is within 200 metres of a motor vehicle accessible area, low-water springs line of any sea or harbour, or Great Walks Track.[3]

The Act does not cover private land, for example: a farm where the owner allows people to camp for free is not covered, nor is land administered by Waka Kotahi or Land Information New Zealand.

Of particular relevance to this discussion document, freedom campers are not required to sleep in vehicles that contain toilets of any standard, except where local freedom camping bylaws or notices specify this must occur.

Councils and DOC can make rules for where and how people freedom camp

The Act says that freedom camping is permitted unless it has been restricted or prohibited in an area. The Act enables local authorities[4] and the Department of Conservation to identify areas in the regions, districts or cities they manage where freedom camping should be restricted or prohibited.

The Act provides for local authorities to make freedom camping bylaws in order to protect the area, people's health and safety, or access to the area. The Department of Conservation can issue freedom camping notices. Local authorities often, through the bylaws they make, restrict freedom camping in some areas to vehicles that are certified as self-contained.

Penalties under the Freedom Camping Act 2011

The Act also sets out a range of offences related to freedom camping. These include depositing waste in an inappropriate waste receptacle (for example, other than in a rubbish bin or public toilet), interfering with or damaging flora or fauna, and breaching freedom camping bylaws or notices. It sets the penalties that can be charged. Currently, most offences attract a $200 infringement fine. A person who discharges a noxious substance that significantly affects the environment, or causes significant concern to the community, can be liable for a fine of up to $10,000. To date, no one has been prosecuted under this legislation.

One important exclusion from the Act is where someone pulls off the road to take a rest from driving. Waka Kotahi (New Zealand Transport Agency) actively encourages fatigued drivers to rest for road safety outcomes.

3 People camping in New Zealand's 'back country' are not considered to be freedom camping when camping more than 200m away from the low-water springs line of any sea or harbour, Great Walks Track, or motor vehicle accessible area.
4 Regional councils, city councils, district councils and unitary authorities.

Government investment in responsible camping

In 2018, the Government established the Responsible Camping Working Group (the Working Group) to identify ways to better manage the freedom camping system.[5] The Working Group identified a range of issues, including:

- growing numbers of freedom campers were placing pressure on infrastructure and spaces
- the penalties for unacceptable behaviour were too low and difficult to enforce
- the way that the SCVS is supported by the Government could be improved.

Over the last three years, the Government has provided around $27 million in funding for a range of programmes to better manage freedom camping. The programmes the Government has funded include:

- infrastructure, including parking space, toilets and ablution blocks
- monitoring and enforcement, through responsible camping ambassadors, compliance officers and rangers
- education, through signage, pamphlets and camping ambassadors
- waste and rubbish management.

How often do local authorities and the Department of Conservation issue infringements under the Act?

Many territorial authorities have observed a decrease in the total number of infringements issued over the past three years. Some of the larger territorial authorities report higher numbers of annual infringements issued (ranging from 100 to over 600 per year), while the smaller territorial authorities tended to report lower numbers (ranging from 1 to 200 per year).

The Department of Conservation has issued approximately 100 infringement notices under the Act since its enactment in 2011.

However, with a general increase in compliance from campers and reduced infringements being issued, a few territorial authorities have expressed concern around the cost of enforcement and how the revenue from infringement fees was not sufficient to cover this cost. Several territorial authorities have reported relatively low infringement fee collection rates, with most reporting that less than 60% of infringement fees are paid.

MBIE has also innovated in the camping space, testing new technologies to support responsible camping. These include:

- Cameras powered by artificial intelligence to report when campsites are full. These have proven to be effective in stopping overcrowding and providing councils with information on usage of their freedom camping sites, with 91% of campers redirected from full camping sites when made aware that those camping sites are full.
- The Ambassador App, which helped consistently manage campers as they travel through New Zealand. This App has become a de facto database for many self-contained vehicles in New Zealand.
- A trial designating different camping zones in Kaikōura, to test different ways to deliver information to campers about where they could freedom camp without any restrictions, where there were restrictions (such as needing to be in a vehicle with a toilet), or where no camping is permitted.

5 See https://www.mbie.govt.nz/immigration-and-tourism/tourism/tourism-projects/responsible-camping/responsible-camping-working-group/ for more information.

Why does the Government want change?

Sustainability of freedom camping

This Government would like to ensure that New Zealand can deliver a high quality visitor experience across all the tourism offerings available in New Zealand, while ensuring that communities and the natural environment do not bear the costs. We want our international visitors to understand our value proposition, behave appropriately and pay their way. We would also like to ensure that the social licence in New Zealand for freedom camping is not only maintained, but enhanced in the many communities that currently see certain aspects of freedom camping as highly undesirable.

With regards to freedom camping, this means ensuring that we have a system in place which protects the natural environment, supports visitors to act responsibly and allows New Zealanders the opportunity to access and enjoy their backyard.

What we know about the use of self-contained vehicles

Despite improvements over recent years, there are still far too many instances of freedom campers disposing of human waste inappropriately. Some local communities have expressed concern about this: it causes localised pollution, poses a health hazard, requires cleaning up and devalues the experience of other, more responsible tourists.

If freedom campers have access to appropriate facilities, such as toilets and kitchens, it is possible the number of such instances would decrease. However, further work is required to ensure that people are encouraged to use onboard facilities. This could include strengthening the standard of self-containment to require permanently plumbed toilets, as suggested by the Parliamentary Commissioner for the Environment.[6] Research published by MBIE in 2020 found that many international visitors, despite having access to a toilet in the vehicle they purchased or hired, did not use it (see table below).

Key statistics relating to self-contained vehicles and toilet use[7]	
Percentage of international freedom campers who hired a budget vehicle or purchased a vehicle which had a toilet (and was likely to have met the Self-Contained Vehicle Standard - SCVS)	**74%**
Percentage of those who did have a toilet in the above group, and who used it	**28%**
Percentage of international freedom campers who hired a premium vehicle which met the SCVS, and who used the onboard toilet facilities	**74%**
Percentage of domestic freedom campers who used an onboard toilet facility[8]	**96%**

6 See https://www.pce.parliament.nz/media/197087/report-not-100-but-four-steps-closer-to-sustainable-tourism-pdf-24mb.pdf for the full report from the Parliamentary Commissioner for the Environment.

7 This research was drawn from an online survey of 7,328 respondents, including 6,823 New Zealand residents and 505 international visitors. Online surveys were distributed via a range of camping groups and companies.

8 This number may be slightly lower, as the 2020 survey methodology drew upon domestic responsible campers who were either part of a camping association, used the CamperMate app, or rented their vehicle.

Not 100%, but four steps closer to sustainable tourism

The Parliamentary Commissioner for the Environment (PCE), in his report *Not 100% - But Four Steps Closer to Sustainable Tourism*, noted that:

> *Freedom camping is one of the most visibly contentious sectors of New Zealand's tourism industry. Its growth has resulted in a range of social and environmental pressures. The issue that has received the most attention is the tendency of freedom campers to use their natural surroundings as a toilet or place to clean dishes and clothes.*
>
> *In recent years, government efforts to address this problem have focused heavily on the provision of freedom camping facilities and education campaigns. Those efforts have not resolved the issue. More attention needs to be given to the inadequate toilet facilities that are present in some vehicles certified as self-contained, and to ensuring that council officers can recover any penalties for non-compliance with local requirements.*

The PCE recommended that the best approach to solve this is to: strengthen the SCVS to require vehicles to have a permanently plumbed toilet; reintroduce national oversight of the SCVS, and that either Waka Kotahi New Zealand Transport Agency (Waka Kotahi) or MBIE be responsible for this; and ensure freedom camping penalties represent a serious deterrent to undesirable camping behaviour.

The four proposals in this report align with the recommendations in the PCE's report.

Increasing numbers of people camping puts pressure on communities

Higher visitor numbers means camping is having a bigger impact in some places. In particular, the growing number of people freedom camping in some places, particularly during peak visitor season, means that freedom camping is more visible, and is causing more pressure. This is beginning to erode the social licence in some communities for freedom camping. This is despite the Government investing significantly in freedom camping infrastructure over the last three years.

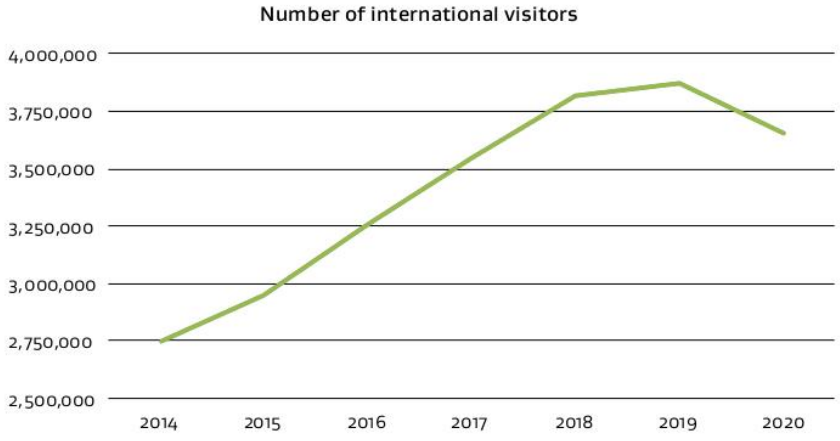
The cumulative effect of these issues has a range of consequences. It means that there can be greater costs to local authorities to manage the visitors in their regions, including facility maintenance, litter and waste.

These issues also put New Zealand's brand proposition at risk. They reduce community support for freedom camping and tourism more broadly, and can mean that visitors (both domestic and international) do not have a high quality visitor experience.

There were increasing visitor numbers prior to COVID-19

Since 2011, New Zealand has had a huge growth in visitor numbers. In the year ended March 2020, over 3.5 million people visited New Zealand – up from 2.75 million in 2014. This number would likely have been higher, if not for the impact of the COVID-19 pandemic on New Zealand.

Freedom campers have increased in line with this growth. The estimated number of freedom campers has increased from the tens of thousands in the early 2000s to 245,000 in the 2019 calendar year. Around 154,000 were international visitors (63%), and the remaining 91,000 were New Zealand residents.



Ron Eckman, Golden Bay

What the Government wants to achieve

This Government wants to ensure that New Zealanders and international visitors have access to a range of camping experiences, including camping for tramping, hunting and fishing, while ensuring local communities have control of camping in their areas and the value of Brand New Zealand is maintained. Camping should have a net positive economic and social impact for communities, and must not harm the local environment.

To achieve this, we need a regulatory system that ensures communities and government land managers can make decisions about how to manage freedom camping in their districts, and have confidence in the measures available for managing it. We need a system that supports campers to be responsible, and which the community trusts. However, vulnerable groups must not be further disadvantaged by the measures in place to support freedom camping.

How much do you agree that certain types of vehicle based freedom camping is a problem?				
1: Strongly agree	2: Agree	3: Neutral	4: Disagree	5: Strongly disagree

What do you think?

What are your views on freedom camping in vehicles?

When answering this question you may like to think about:

- Is vehicle based freedom camping an issue in your area?
- Have you observed any specific issues?
- Are there specific behaviours which impact on your use of local amenities/infrastructure?
- What benefits does vehicle based freedom camping provide for your region?

Victoria Andrews, Akaroa
(left and top right images)

Proposals for improving freedom camping

The following pages set out four proposals for improving responsible camping in New Zealand. We are also seeking your views on how options could be effectively implemented.

Each of the four options could stand on its own, but they could also form the basis for a package of reform to reduce the harm from freedom camping, and protect our communities and the environment. We want your feedback on these proposals.

PROPOSAL 1: MAKE IT MANDATORY FOR FREEDOM CAMPING IN A VEHICLE TO BE DONE IN A CERTIFIED SELF-CONTAINED VEHICLE

This proposal would make it mandatory for all vehicle based freedom camping to be done in certified self-contained vehicles. It would not affect people who freedom camp in tents, or where people are already excluded under the Freedom Camping Act 2011 (the Act).

How this could work in practice

Any vehicle that people sleep in when freedom camping would be required to be certified as self-contained. Vehicle owners would have to ensure their vehicle is certified self-contained before they freedom camp anywhere in New Zealand.

People would still be able to sleep in vehicles which are not certified as self-contained in places not covered by the Act – for example commercial and conservation campgrounds, and on private land. People could still freedom camp in tents, except in places where this type of freedom camping is restricted by freedom camping bylaws or notices.

The requirements for self-contained vehicles would be set out in regulations (see Proposal 3). The requirements for self-containment could either be those set out in the current SCVS (see page 26), or could entail stronger requirements (see Proposal 4).

Exceptions

There would be some exceptions when implementing this proposal. For example, it makes sense for the current exceptions in the Act to remain. These exceptions are detailed in section 5(2) of the Act, and include temporary or short-term parking, day trip excursions, and resting or sleeping at the roadside in a caravan or motor vehicle to avoid driver fatigue.

Further exceptions could be added to support driver safety and appropriate behaviour. For example, we would not want to require people to drive to alternative accommodation when under the influence of alcohol.

Potential impact

The number of instances of inappropriate disposal of human waste would likely reduce as a toilet would be available for use at all times by the freedom campers using the vehicle.

The new national-level requirement for vehicle based freedom campers to use a self-contained vehicle would support achieving communities' expectations for freedom campers' behaviour.

Businesses and individuals who own vehicles with sleeping platforms that are not self-contained, and wish to continue using or leasing them for freedom camping, would need to upgrade those vehicles to meet the requirements set out in regulation. People who choose to drive to places and camp in a tent would not be affected, but existing freedom camping bylaws and notices that restrict or prohibit camping in a tent in certain places would still apply.

This option would likely increase the number of people camping in certified self-contained vehicles. It may also incentivise price-sensitive campers to choose alternative sleeping arrangements, including tents, or staying at locations which are not considered to be freedom camping areas, such as commercial or conservation campgrounds.

At least 82% of international visitors who purchase their own vehicle or who hire a budget vehicle, and who choose to camp in New Zealand, cite the low cost of travel as a reason for camping. We would expect a few international visitors who freedom camp in New Zealand to change their travel plans, including putting off visiting New Zealand. Some people may opt to freedom camp in tents or stay in budget accommodation, rather than pay for a campground, because their vehicle with a sleeping platform would be required to be certified self-contained. They could also stay for a shorter period of time.

There will be a financial impact on owners of vehicles that are capable of being connected to self-contained (such as vans, caravans and larger vehicles) if they wish to freedom camp in New Zealand. It could cost an estimated $500 to $800 for a basic upgrade to a vehicle so that it meets the minimum requirements of the current self-contained vehicle standard. Larger vehicles, and any stronger requirements, such as requiring a fixed toilet, would cost more. Similarly, some vehicles may not be able to be upgraded. Rental costs of certified self-contained vehicles compared to non-certified vehicles with sleeping platforms can be $25 more per day, and substantially more if renting a vehicle with a fixed toilet.

Expected outcomes if proposal introduced	
Reduced instances of inappropriate disposal of human waste	Increased numbers of people freedom camping in self-contained vehicles, tents, or using alternative accommodation (such as Youth Hostels)
No people camping in vehicles without toilets	A potential decrease in the number of price sensitive international visitors

How much do you support the proposal to make it mandatory for vehicle based freedom campers to use a certified self-contained vehicle?				
1: Strongly agree	2: Agree	3: Neutral	4: Disagree	5: Strongly disagree

What do you think?

Do you support this proposal?

When answering this question you may like to think about:

- Do you consider this option will improve camper behaviour?
- Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

How might this proposal impact you?

When answering this question you may like to think about:

- Will this proposal increase or decrease the likelihood of you camping?
- Will this proposal have a direct financial impact on you or your business?
  - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

What things should the Government consider to implement this option?

When answering this question you may like to think about:

- What exceptions should the Government allow under this proposal?
- Do you have any ideas about how this proposal could be implemented?
- Should this option be considered alongside other options proposed in this discussion document?

PROPOSAL 2: MAKE IT MANDATORY FOR FREEDOM CAMPERS TO STAY IN A VEHICLE THAT IS CERTIFIED SELF-CONTAINED, UNLESS THEY ARE STAYING AT A SITE WITH TOILET FACILITIES

This proposal would require all freedom campers to either stay at sites with toilet facilities or to use a vehicle which is certified self-contained. It would cover any style of freedom camping, including people who stay in tents. The exception would be where this requirement would conflict with the normal use of the place.

Proposed exceptions

The main exceptions to this proposal are public conservation lands and regional parks. It is normal in these places for people to camp near a vehicle accessible area or the coast but not near a toilet, and it is expected that campers would dispose of waste appropriately. The Department of Conservation and regional councils already have the power to issue notices or make bylaws to control freedom camping where necessary.

Potential impact

This option is likely to impose moderate costs on individuals and on businesses which currently lease or sell vehicles with purpose built sleeping facilities that do not contain toilets. Some businesses and individuals may choose to upgrade the vehicles they own or lease, so that campers are certain to have toilet facilities wherever they stay. More individuals may choose to hire certified self-contained vehicles to reduce uncertainty around where and when they can camp.

There would be greater consistency of freedom camping rules across the country, which may support efforts to ensure campers stay at places which have the means to host them and manage their impact. Currently 33 of the 67 territorial authorities have in place freedom camping bylaws which manage and restrict where people can camp. These often relate to restricting areas to camping in certified self-contained vehicles. As such, this proposal may result in more people camping at sites that have the facilities to host them, and fewer people may camp at restricted areas designated for certified self-contained vehicles

Some issues presented by freedom camping may improve, including waste and poor behaviour. However, it is possible that congestion at some camping sites (both designated freedom camping sites with toilets and paid campgrounds) may increase if people continue to camp in tents or non-certified vehicles, as there may not be sufficient capacity in campgrounds at peak times, at least during an initial adjustment period.

Expected outcomes if proposal introduced	
⇧ Increased numbers of people camping in certified self-contained vehicles	⇧ Increased congestion at some camping sites (at least during the adjustment period)

How much do you support the proposal to make it mandatory for freedom campers to stay in vehicles which are certified self-contained, unless they are staying at a site with toilet facilities (excluding public conservation lands and regional parks)?				
1: Strongly support	2: Support	3: Neutral	4: Oppose	5: Strongly oppose

What do you think?

Do you support this proposal?

When answering this question you may like to think about:

- Do you consider this option will improve camper behaviour?
- Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

How might this proposal impact you?

When answering this question you may like to think about:

- Will this proposal increase or decrease the likelihood of you camping in New Zealand?
- Will this proposal have a direct financial impact on you or your business?
  - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

What things should the Government consider to implement this option?

When answering this question you may like to think about:

- What do you think is required to achieve this option?
- What exceptions should the Government allow under this proposal?
- How far from toilet facilities should a person be able to freedom camp if not in a vehicle with a toilet (eg, 100 metres, 200 metres)?
- Should this option be considered alongside other options proposed in this discussion document?

PROPOSAL 3: IMPROVE THE REGULATORY TOOLS FOR GOVERNMENT LAND MANAGERS

In December 2020, the Responsible Camping Working Group recommended that the Government consider a number of improvements that it believes would improve the management of vehicle based responsible camping in New Zealand. These include:

- Increasing the penalties for freedom camping following breaches of freedom camping bylaws or notices and, in particular, for instances where a person in a non-certified vehicle camps at a site designated as only for campers in certified self-contained vehicles.
- Introducing a regulatory system for the SCVS – specifically an oversight regime for the certification of vehicles to the current standard, and establishment of a national register of certified vehicles to enable the vehicles to be tracked and their certification status checked.

How this could work in practice

Stronger infringement scheme

New regulations under the Act would be made to specify higher fines for breaches of freedom camping bylaws and notices. Currently, people who inappropriately camp in areas which are restricted or prohibited to freedom camping can be fined up to $200 under the Act. The Act already provides for regulations to be made to increase penalties to a maximum of $1000. As mentioned earlier, some territorial authorities issue up to 600 fines each year.

Under this option, new regulations specifying higher fines could be made for different types of offences. This would enable local authorities and the Department of Conservation to give those not meeting the local freedom camping requirements higher fines. Higher fines would also enable local authorities to better recover the costs of enforcement activities.[9]

Under the Act, vehicle rental companies may, but are not required to, pass on any fines to the people that have hired their vehicles. This means that, in some instances, overseas visitors could leave the country without paying any associated fines. To address this, the Act could be amended to ensure those who rent vehicles are held responsible for their actions. This could include making vehicle rental companies responsible for passing on any infringement notices to campers, and holding them accountable for non-payment. Currently only some vehicle rental companies pass on infringement notices to campers.

The infringement scheme could also be strengthened by introducing a new infringement for those vehicles which fraudulently claim to be certified self-contained.

Vehicle confiscation

Requirements relating to the confiscation of vehicles which frequently break freedom camping rules could be amended. Currently the Act allows enforcement officers to seize and impound property in a local authority area or on conservation land:

- if the property has been or is being used in the commission of an offence; and
- if it is reasonable in the circumstances to seize and impound the property, or it is necessary for public health and safety, to protect flora or fauna, to ensure access, or to prevent ongoing commission of the offence; and
- if someone is in the vehicle at the time, the officer must give the person an opportunity to stop committing the offence.

The amended requirements could, for example, enable the confiscation of a vehicle that does not meet the requirements to contain a toilet (under any of proposal 1, proposal 2 or existing bylaws or notices requiring freedom campers at particular places to stay in self-contained vehicles), or that has received multiple fines for breaching requirements.

9 Fines issued by the Department of Conservation are not retained by the department, and Proposal 3 would not change this.

The amended requirements would also need to include the conditions by which a person could receive their confiscated vehicle back. This could range from proving that a person will undertake upgrades to their vehicle, paying any associated infringement notices, or removing any upgrades that constitute any form of sleeping platform.

Regulatory system for self-contained vehicles

This proposal would introduce a new regulatory agency, or add new regulatory powers to an existing agency, to provide national oversight of legislated requirements for self-contained vehicles. The regulatory agency's activities would be funded through cost recovery, in line with similar types of certification regimes. Regulatory functions could include:

- recognising and licensing persons and organisations that may undertake sanitary plumbing work on vehicles and certify that the work meets the legislated requirements for a vehicle to be self-contained
- auditing licensed persons and organisations
- establishing a national database of vehicles that are certified self-contained.

This aspect of the proposal could work alongside proposal 4 (to strengthen the requirements for self-contained vehicles).

It also aligns with the Parliamentary Commissioner for the Environment's recommendation to introduce national oversight of the SCVS (page 109 to 111 of *Not 100% - But Four Steps Closer to Sustainable Tourism*).

Allowing local councils to enforce rules on other government owned land

The Act currently only covers local authority areas and the conservation estate, and does not apply to all Government owned or managed land, for example land owned by Waka Kotahi. This means that it can be hard to have a consistent approach to managing freedom camping within a local authority area, and make it harder for some government agencies to control freedom camping on their land. the Government is considering making amendments to section 6 of the Act to address this, which may, for example, allow local authorities to act as enforcement agents on land administered by Waka Kotahi or other Crown owned land.

The proposal would not limit or affect existing bylaws or notice making powers

Councils and the Department of Conservation would still be able to restrict or prohibit areas with regards to freedom camping under the Freedom Camping Act 2011. As is current practice, this includes banning freedom camping from some areas, and restricting freedom camping in some areas to vehicles that meet the SCVS.

Potential impact

It is likely there would be moderate impact and low costs associated with change for individuals and vehicle businesses.

Penalties

Higher penalties for non-compliance, and the improved requirements around infringement collection, are likely to deter some campers from breaching local bylaws and notices around where and how they camp. Some issues presented by freedom camping may improve, for example, freedom camping at restricted or prohibited sites. Those campers who breach bylaws or notices would be subject to higher penalties, which are more likely to be enforced given the higher amount the enforcement agency could recover and the stronger tools in place. However, it is possible that some issues may continue to be observed at some camping sites.

More people who hire vehicles and who breach local bylaws and notices will pay any associated infringement fines, as vehicle rental companies are held responsible for collecting their payment.

Regulatory system for the Self-Contained Vehicle Standard

Local authorities would be supported by the tools available to them to manage freedom camping within their region, while domestic and international visitors would still retain the ability to camp at a range of freedom camping sites, commercial and conservation camping grounds.

This option could affect plumbers and other businesses who currently install and certify vehicles to the SCVS, as they would likely need to take steps to become issuing authorities and/or testing officers, and to meet audit requirements. Some plumbers and businesses currently certifying vehicles may decide that the costs to them of meeting the new regulatory requirements are too high and stop providing this service. Other businesses may take on certification activity, particularly if they are already in a vehicle certification related business, such as vehicle testing.

As the new regulatory regime would operate on a cost recovery basis, individuals and businesses would be required to pay additional fees and/or levies when having their vehicles certified, to cover the cost of the regulatory agency's operations.

Expected outcomes if proposal introduced	
Potentially greater compliance with local bylaws and DOC notices	Increased levels of enforcement (including penalties being passed to campers) from local councils if sufficiently resourced
Increased costs to individuals and businesses who seek self-contained vehicle certification	Similar numbers of vehicles are certified self-contained

How much do you support the proposals to improve the regulatory tools for government land managers?				
1: Strongly support	2: Support	3: Neutral	4: Oppose	5: Strongly oppose

What do you think?

Do you support this proposal?

When answering this question you may like to think about:

- Are there any specific parts of this proposal you support or oppose?
- Do you consider this option will improve camper behaviour?
- Will this option support or improve tourism outcomes in your region?
- Will this option decrease pressure on the environment and local government infrastructure?
- Are there impacts of this proposal that you are concerned about?

How might this proposal impact you?

When answering this question you may like to think about:

- Will this proposal increase or decrease the likelihood of you camping in New Zealand?
- Will this proposal have a direct financial impact on you or your business?
  - If yes, please indicate if this is a personal or business expense, and quantify how much you estimate it would impact you.
- Will this option increase or decrease the attractiveness of visiting other regions in New Zealand?

What things should the Government consider to implement this option?

When answering this question you may like to think about:

- What would you like to see in practice?
- Should this option be considered alongside other options proposed in this discussion document?

What would be an appropriate penalty?

When answering this question you may like to think about:

- Should non-compliant vehicles be confiscated? If so, under what conditions?
- If vehicles are confiscated, what conditions should be placed on returning the vehicle?
- Should fines be similar to those for not holding a valid Warrant of Fitness for a motor vehicle?
- What levels should fines be set at?
- Who should collect a fine?

PROPOSAL 4: STRENGTHEN THE REQUIREMENTS FOR SELF-CONTAINED VEHICLES

The current requirements and process for self-containment of vehicles are set out in the New Zealand Standard, NZS 5465:2001 *Self containment of motor caravans and caravans*,[10] which is more commonly known as the Self Contained Vehicle Standard (SCVS). A fully self-contained vehicle must be able to support a given number of people for three days without needing additional water supplies or dumping waste.

As it is a voluntary standard, no government agency holds responsibility for administering or overseeing it. However, the Ministry of Business, Innovation and Employment currently sponsors it for free through Standards NZ.

What are some of the minimum requirements in the SCVS?

- The vehicle has a toilet that is adequately secured when travelling and is usable within the vehicle, including sufficient head and elbow room whenever required, even with the bed made up. The toilet must provide sufficient waste holding capacity for the occupants for a minimum of three days. Toilet types can include:
  - Cassette toilet: a fixed toilet with a removable holding tank.
  - Composting toilet: a toilet that is an aerobic processing system to treat human waste, by composting. Where any waste water is separated it shall be via a black water tank.
  - Efficiency flushing toilet: a toilet which is flushed by a small volume of water.
  - Marine toilet: a fixed flushing toilet with a macerator pump, either manual or electrically operated.
  - Permanent toilet: a toilet that is permanently fixed inside the motor caravan.
  - Portable toilet: a toilet with its own holding tank, the toilet is not fixed to the motor caravan.
- The vehicle has a sealable solid waste container for rubbish.
- The vehicle is fitted with water supply tank(s), having a capacity of not less than 4 L per person for a minimum of three days. Transportable, individual containers are acceptable.
- The vehicle is equipped with a sink.
- The vehicle provides a waste tank(s) to receive all the waste water from permanently installed fixtures, with corresponding capacity.

Certification process

To become certified to the standard, a vehicle must be inspected by one or two approved testing officers (depending on their experience and qualifications). If a vehicle passes these inspections, then an approved issuing authority can then issue both a self-containment certificate, which lists the equipment fitted and the number of people the vehicle can support, and a self-containment warrant, which must be fixed to the inside left of the front window or windshield.

10 See www.standards.govt.nz/sponsored-standards/self-containment-of-motor-caravans-and-caravans/

Any plumber registered under the Plumbers, Gasfitters and Drainlayers Act 2006 can be an issuing authority to certify a vehicle as self-contained. There are currently around 8,000 registered plumbers in New Zealand. A plumber can also certify a person to be an issuer of certification. Current issuing authorities for the SCVS include VanCo, the New Zealand Motor Caravan Association, New Zealand Lifestyle Camping and some rental companies.

How it is currently used

Local authorities can make bylaws under the Freedom Camping Act 2011 that restrict freedom camping in specific areas to vehicles that are certified as self-contained. This can help manage the problems associated with visitor growth in areas where there are no or minimal infrastructure such as sewage disposal facilities.

Potential issues with the Standard

As it is a voluntary standard, the owner of a vehicle that wishes to have a toilet or other sanitary plumbing facilities on board does not have to meet the requirements of the SCVS. Certification of vehicles to the standard by issuing authorities and testing officers is not monitored.

There is no central register of certified self-contained vehicles. Some councils have advised that this can make it difficult to enforce bylaws which reference the SCVS and have expressed concerns about inappropriate certification of vehicles and the falsification of certification documents. There is no evidence on the scale of this problem.

The Parliamentary Commissioner for the Environment, in his report *Not 100% - But Four Steps Closer To Sustainable Tourism,* notes the issues raised above, and goes further in stating that all certified self-contained vehicles should be required to have a permanently plumbed toilet. He considers the current language of allowing many types of portable toilet to be used is vague, and lends itself to abuse. This aligns with anecdotal reports which suggest that in some instances, toilets are unable to be practically used within a vehicle. As such, the Government would like to know your views about whether the minimum requirements for self-containment of a vehicle should be strengthened.

Why is it important?

All options referenced in this paper include certification to the SCVS as part of the regulatory solution. This means that any new regulatory system for self-contained vehicles may draw on the SCVS. It is therefore important to understand views about the SCVS, and whether any improvements to it are required.

Do you think that the requirements for self-containment should be strengthened?		
1: Yes	2: Neutral	3: No

What do you think?

Is the current standard fit for purpose?

When answering this question you may like to think about:

- Should there be a requirement that self-contained vehicles have fixed toilets?
- Should there be specific reference to the types of vehicles that can be self-contained?

Who should certify to the Standard?

When answering this question you may like to think about:

- Should any plumber registered under the Plumbers, Gasfitters and Drainlayers Act 2006 be able to certify to the Standard, or should certifiers be separately recognised and licensed?
- Once a vehicle has passed its initial certification, should other entities be able to re-certify it?

Other considerations

Transition arrangements

We are interested to understand your views on whether there should be any transition arrangements in place for any new rules regarding self-contained vehicles and their use. Potential transition arrangements could include:

- Providing one year for people to upgrade or dispose of their vehicles.
- Allowing for vehicles which are currently certified to the SCVS to continue to be used for as long as the certification is valid (in the case where the Government decides to put in place new requirements for self-containment of vehicles).

Homelessness

Many local authorities report people experiencing homelessness being present at some freedom camping sites and in their districts. The 2018 Severe Housing Deprivation Report shows 2,106 people living in a mobile dwelling and 1,311 living in an improvised dwelling (such as a tent). A further 1,431 people were living at a camping ground or motor camp. However, the actual number may be higher, particularly in light of the impact of COVID-19 and the ongoing pressures in the housing market.

The proposals set out in this discussion document are not intended to further disadvantage vulnerable population groups. However, it is possible that some of the proposals in this document may do so (for example, by making it mandatory for freedom camping in a vehicle to be done in a certified self-contained vehicle).

As such, we want to hear your views as to how the Government could ensure homeless people are not further disadvantaged by the proposals, while supporting the effective implementation of any proposals that are introduced. This could include making homelessness exempt from any new regulatory system, and supporting local authorities, government agencies and not-for-profit organisations to work together on referral pathways for homeless people.

What do you think?

What transition arrangements should be in place?

When answering this question you may like to think about:

- How long should the Government give people to upgrade or dispose of their vehicles?
- Should currently certified self-contained vehicles be exempt from any new rules?
- Are there any other transition arrangements we should consider?

How could the Government ensure vulnerable groups are not further disadvantaged?

- Could the Government make homelessness exempt from any new regulatory system? What might this look like?