If calling, please ask for Democratic Services

2022 Funding and Financial Policies Hearing Committee

Tuesday 17 May 2022, 10am

Taumata Kōrero, Council Chamber, Greater Wellington Regional Council,
100 Cuba St, Te Aro, Wellington

Members

Cr Ponter (Chair)	Cr Gaylor
Cr Blakeley	Cr Kirk-Burnnand
Cr Connelly	Cr Staples

Recommendations in reports are not to be construed as Council policy until adopted by Council

2022 Funding and Financial Policies Hearing Committee

Tuesday 17 May 2022, 10am

Taumata Kōrero, Council Chamber, Greater Wellington Regional Council,
100 Cuba St, Te Aro, Wellington

Public Business

Funding and Financial Policies Hearing Committee
17 May 2022
Report 22.166

Greater Wellington
Te Pane Matua Taiao

For Decision

PROCESS FOR CONSIDERING SUBMISSIONS AND FEEDBACK ON THE FUNDING AND FINANCIAL POLICIES

Te take mō te pūrongo
Purpose

1. To inform the Funding and Financial Policies Hearing Committee (the Committee) of the process for considering submissions and feedback on the proposed amendments to the 2022 Ko te Kaupapa Here Moni Whiwhi me Ahumoni Revenue and Financing Policy and Te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori Rates Remissions on Māori Land Policy.

He tūtohu
Recommendations

That the Committee:

1 **Agrees** to the hearing process as set out in this report.

2 **Accepts** the late submissions received on proposed amendments to the Revenue and Financing Policy.

Te tāhū kōrero
Background

2. At its meeting on 17 March 2022, Council approved the consultation documents for the proposed amendments to the Revenue and Financing Policy and Te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori Rates Remissions on Māori Land Policy.

3. At its meeting on 7 April 2022, Council established the Committee to consider and hear submissions and feedback, and to make recommendations to Council, on the proposed amendments to the Revenue and Financing Policy and Te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori Rates Remissions on Māori Land Policy. The Committee's Terms of Reference (**Attachment 1**) outline the Committee's roles and responsibilities.

Public consultation

4. The hearing completes the public consultation phases for both policies.

5. The consultation period for the 2022 Ko te Kaupapa Here Moni Whiwhi me Ahumoni – 2022 Revenue and Financing Policy was open from 21 March to 20 April 2022.

6. The consultation period for Te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori Rates Remissions on Māori Land Policy was open from 21 March to 2 May 2022.

Principles of consultation

7. There are six principles set out in the Local Government Act 2002. One of these principles is that views presented to a local authority should be accepted with an open mind, and should be given due consideration by the local authority in making a decision.

8. The Committee should also take into account that persons who wish to have their views on the decision or matter considered by the local authority should be provided with a reasonable opportunity to present those views to the local authority.

9. It is consistent with best practice that members should be present for the substantial duration of the hearing in order to participate in the decision-making of the Committee.

Te tātaritanga
Analysis

Submissions and feedback

10. Feedback from the community was obtained through the Have Your Say website, together with a number of written submissions received via direct mail and at events across the Region. Analysis on the feedback is detailed in Analysis of submissions to the 2022 Revenue and Financing Policy – Report 22.183, and Analysis of submissions on Rates Remissions on Māori Land Policy – Report 22.192.

11. The written submissions have been distributed to members of the Committee separately. It is suggested that written submissions are taken as read by the Committee and that members only discuss those submissions on which they want to make a particular comment.

2022 Ko te Kaupapa Here Moni Whiwhi me Ahumoni - 2022 Revenue and Financing Policy

12. Greater Wellington received 17 submissions; with four received through Have Your Say, and 13 received via email.

Te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori Rates Remissions on Māori Land Policy

13. Greater Wellington received eight submissions; with six received through Have Your Say, and two via email.

Late submissions

14. Greater Wellington received seven late submissions on the 2022 Ko te Kaupapa Here Moni Whiwhi me Ahumoni - Revenue and Financing Policy, and officers recommend that these be accepted for consideration. No late submissions were received on the Te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori Rates Remissions on Māori Land Policy.

Oral presentation process

15. The purpose of the hearing is to hear oral presentations in support of written feedback. At the time of writing this report seven submitters wished to be heard. Submitters will be heard on Tuesday 17 May 2022. Deliberations will commence following the hearing

of the final speaker. A hearing schedule will be provided to Committee members, with a final version available on the day of the hearing.

16. Each submitter has been allocated a total time of 15 minutes, which is divided into two segments – ten minutes for the submitter to speak, and five minutes for the Committee to ask any clarifying questions. There is no difference between individuals and groups in the time allocated.

17. People speaking to their submissions may speak in person, or online via Microsoft Teams.

18. It is proposed that deliberations commence following the hearing of oral presentations.

Consideration of issues raised in submissions and feedback

19. The Committee must consider all written submissions, regardless of whether an oral presentation has been made.

Ngā hua ahumoni
Financial implications

20. There are no financial implications arising from this report.

Ngā Take e hāngai ana te iwi Māori
Implications for Māori

21. There are no direct implications for Māori arising from this report; however, one of the policies under consideration by the Committee is on rates remission on Māori land. That policy seeks increase support for Māori landowners through wider range of eligible Māori land that may qualify for a rates remission from Greater Wellington. The reports for each of the Revenue and Financing Policy and Rates Remissions on Māori Land Policy consider the implications for Māori from the Committee's decision making in more detail.

Ngā tikanga whakatau
Decision-making process

22. Officers considered the matters requiring decision in accordance with the requirements of Clause 30 and 31 of Schedule 7 of the Local Government Act 2002 and the decision-making requirements of Part 6 of the Local Government Act 2002.

Te hiranga
Significance

23. Officers considered the significance (as defined by Part 6 of the Local Government Act 2002) of these matters, taking into account Council's *Significance and Engagement Policy* and Greater Wellington's *Decision-making Guidelines*. Officers recommend that these matters are of low significance, given their administrative nature.

Te whakatūtakitaki
Engagement

24. Due to the low significance of the matters for decision, no external engagement was required.

Ngā tūāoma e whai ake nei
Next steps

25. The Committee will prepare a report for Council to consider at its meeting on 16 June 2022, setting out the Committee's recommendations on the adoption of the proposed amendments to the Revenue and Financing Policy and Te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori Rates Remissions on Māori Land Policy.
26. Each person or organisation who made a submission or provided feedback, and who provided a contact address (including email) will, subsequent to Council adopting the proposed amendments to both policies, receive a response outlining Council's decision and any key changes.
27. A press release will be published, outlining Council's decisions and any key changes, and be made available on Greater Wellington's website.

Ngā āpitihanga
Attachment

Number	Title
1	Terms of Reference for Funding and Financial Policies Hearing Committee

Ngā kaiwaitohu
Signatories

Writer	Lucas Stevenson – Kaitohutohu/Advisor, Democratic Services
Approvers	Alex Smith – Kaitohutohu Matua/Senior Advisor, Democratic Services Francis Ryan – Kaiwhakahaere Matua/Manager, Democratic Services Luke Troy – Kaiwhakahaere Matua Rautaki/General Manager Strategy

He whakarāpopoto i ngā huritaonga Summary of considerations
Fit with Council's roles or with Committee's terms of reference The Committee has been charged with carrying out the hearing process for the consideration of submissions made on the proposed amendments to the Revenue and Financing Policy and Te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori Rates Remissions on Māori Land Policy.
Contribution to Annual Plan / Long Term Plan / Other key strategies and policies This report outlines the process for considering submissions on amendments to two key Council policies - the Revenue and Financing Policy and Te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori Rates Remissions on Māori Land Policy. These policies shape who pays for Greater Wellington activities and services set out in the Long Term Plan.
Internal consultation Te Hunga Whiriwhiri and the Finance department were consulted.
Risks and impacts - legal / health and safety etc. There are no risks or impacts arising from this report.

Attachment 1 to Report 22.166

2022 Funding and Financial Policies Hearing Committee

1 Purpose

To hear and consider submissions made on the proposed changes to the Revenue and Financing Policy and the Rates Remission on Māori Land Policy, and recommend to Council any amendments.

2 Powers

The 2022 Funding and Financial Policies Hearing Committee has the power to:

- Consider both the written and oral submissions on the proposed changes to the Revenue and Financing Policy and the Rates Remission on Māori Land Policy.
- Seek clarification from Council officers on any technical matters.
- Develop recommendations on amendments to the proposed changes to the Revenue and Financing Policy and the Rates Remission on Māori Land Policy for consideration by Council.

3 Responsibilities

The 2022 Funding and Financial Policies Hearing Committee shall ensure that:

- The hearing and consideration process is carried out in a way that is effective and timely;
- Submitters are provided with the best possible opportunity to be heard in support of their submission;
- Hearing Committee members receive submissions with an open mind and give due consideration to each submission;
- The decision making process is robust and transparent.

4 Members

The members of the 2022 Funding and Financial Policies Hearing Committee are:

- Cr Roger Blakeley
- Cr Ros Connelly
- Cr Penny Gaylor
- Cr Chris Kirk-Burnnand
- Cr Daran Ponter
- Cr Adrienne Staples

5 Chair

Cr Ponter is the Chair of the Funding and Financial Policies Hearing Committee.

6 Quorum

Three Committee members.

Attachment 1 to Report 22.166

7 Meeting procedures

- All members have equal speaking rights and a deliberative vote.
- The Chair has a deliberative vote; and, in the case of an equality of votes, has a casting vote.
- Members must be present for the substantial part of the hearing and deliberations in order to participate in the decision-making of the Hearing Committee.
- Submitters may speak to their submission by remote participation.

8 Duration of Committee

The 2022 Funding and Financial Policies Hearing Committee is deemed to be dissolved at the end of the decision-making processes on changes to the Revenue and Financing Policy and the Rates Remission on Māori Land Policy.

2022 Funding and Financial Policies Hearing Committee
17 May 2022
Report 22.183

For Decision

ANALYSIS OF SUBMISSIONS TO THE 2022 PROPOSED REVENUE AND FINANCING POLICY

Te take mō te pūrongo
Purpose

1. To provide the 2022 Funding and Financial Policies Hearing Committee (the Committee) with an overview of the written submissions received during the 2022 Proposed Revenue and Financing Policy (R&FP) consultation (21 March – 20 April 2022), including initial officer responses on key topics raised in the submissions.

He tūtohu
Recommendation

That the Committee:

1 **Considers** the submissions on the 2022 Proposed Revenue and Financing Policy. (Attachment 1)

2 **Recommends** to Council, following consideration of the submissions, and relevant officer advice, any changes to the 2022 Proposed Revenue and Financing Policy, as agreed to by this Committee.

Te horopaki
Context

2. The R&FP is about where the funding (money) will come from, and how Greater Wellington Regional Council (Greater Wellington) will share the costs of services across the region, and among different groups of ratepayers.

3. The Local Government (Rating) Act 2002 (LGRA) provides councils with powers to set, assess and collect "rates" to fund local government activities. These rates are locally-set property-based taxes. There are three main purposes of the LGRA:

   a To provide local authorities with flexible powers to set, assess, and collect rates.

   b To ensure rates reflect decisions made in a transparent and consultative manner.

   c To provide for processes and information to ensure ratepayers can identify and understand their liability for rates.

4. The R&FP is required to be reviewed a minimum of once every five years but is often reviewed at the same time the Long Term Plan (LTP) is developed, if resources allow for it.
5. On 17 March 2022, Council approved the proposed 2022 R&FP, the Consultation document and the Supporting Information document for public consultation (Report 22.17). Consultation commenced 21 March 2022.
6. The public consultation period ran from 21 March to 20 April 2022. Details of the public consultation engagement are covered in paragraphs 75-80 in this report.

Te tātaritanga
Analysis

7. The public consultation on the proposed R&FP was managed differently than it has been in previous years. This year, the consultation was run alone as there was no LTP or Annual Plan (AP) to join, and the COVID-19 restrictions were at ‘Red’, meaning face-to-face engagement was not possible.
8. The consultation was a digital forward campaign, using email, social media and media releases to get the message out. We also relied on the support of our stakeholders to help spread the message out to the communities.

Submissions received

9. A total of 17 submissions were received either by individuals or on behalf of a group or organisation. Four submissions were received through ‘Have your say’, and 13 through email. Submissions have been circulated to councillors separately.
10. Due to the low volume of submissions, and the high portion of those focusing on singular aspects of the R&FP, it is difficult to determine the actual support level for each of the proposed changes. The views expressed cannot be taken as a representation of the majority, but merely an opportunity to hear, understand and consider the issues expressed.
11. Submitters were asked to identify where in the region they resided:
    - 1 from Wellington
    - 1 from Lower Hutt
    - 1 from Kāpiti Coast
    - 11 from Wairarapa
    - 2 represented the whole region

Summary of submissions and key themes raised during the consultation

12. For the consultation, the public were asked if they supported the proposed changes to the R&FP. Some clearly indicated their level of support, but most took the opportunity to express their views on other aspects of a funding policy.
13. The high proportions of ‘No comment/Unsure’ is largely due to submitters only being focused on a few particular rates that concern them the most, to which they provided their views. The level of support from submitters for the proposed changes is outlined below.

Regional Economic Development

14. Do you support the "Regional Economic Development" proposed funding method?

2 Yes	**1** No	**13** No Comment/Unsure

15. The business sector generally supports the fact that there is little to no change to the funding method that will impact them and appear to be satisfied with this rated activity.

16. Rural landowners showed their support that urban and rural ratepayers should pay the same for this activity.

17. Views for rural being charged a 'fixed-rate' greater than residential pay was expressed because of the assumption that rural rate payers are also businesses. However, the same argument can be made for many residential rate payers running a business from home. Without these properties being classed as 'business', the rural landowners who have no business would be unfairly disadvantaged.

Regional Predator Control Programme

18. Do you support the "Regional Predator Control Programme" proposed funding method?

3 Yes	**1** No	**12** No Comment/Unsure

19. Support for the proposed change was shown by rural landowners.

20. The proposal means that territorial authorities with a higher population and greater capital values will essentially fund a great proportion of the rate, but won't receive any greater benefits. This increase is especially felt in the Wellington Central area that has a differential of 1.7 on their general rates.

Land Management

21. Do you support the "Land Management" proposed funding method?

2 Yes	**2** No	**12** No Comment/Unsure

22. Federated farmers (and the rural landowners in the Wairarapa who expressed support for their submission) showed their support for this proposed change and the rationale for improving this funding method, and supported the proposed changes for spreading costs across a wider ratepayer base. The six Catchment Scheme Chairpersons submitted to this proposal stating they in fact do not support the proposed funding method and have a slightly different method that they'd prefer be used.

23. Their proposal is to use the existing rate payers in the scheme but change the method to be based on capital value (essentially a combination of the status quo and the proposal).

24. Their proposal would reduce the administrative burdens and inaccuracies; however, this is a significant rating impact compared to Council's proposed change in that the scheme members will pay more as compared to the option of spreading the cost.

25. The Catchment Scheme Chairpersons write “We are willing to pay more for the services we value, the services we have been partner to planning and delivering for decades”.

26. The Catchment Scheme Chairpersons argue that the only rate payers paying into the scheme should be those directly impacted by it so they can have the ability to control where and how the funding is spent.

27. They state the proposed funding method will result in spreading the “local share”, which would have implications such as the scheme members having no greater financial stake in the scheme than any other resident in the catchment and they’ll lose control over directing scheme resources to the areas of greatest need within the scheme.

28. They also fear the new “scheme boundary” could be interpreted to be the entire district if the proposed ear of rate payers is accepted.

Flood Protection - Te Kāuru Floodplain Management Plan

29. Do you support the “Flood Protection - Te Kāuru floodplain Management Plan” proposed funding method?

2 Yes	**3** No	**12** No Comment/Unsure

30. In general, there was support for the change to this funding method. However, due to the nature of this kind of change, the nearly 700 rate payers (current riverside landowner target ratepayers) who will have significant rate reductions have not expressed their opinion. This could be because they are happy with the change, or it may be that they are not aware of the proposal due to the limitations of the 2022 R&FP consultation.

31. It is worth noting, an extensive consultation on the proposed rates change was undertaken during the development of the Te Kāuru Floodplain Management Plan. A hearing was held in early 2019 where submissions where received, both in support and opposition of the rates change. The hearing committee felt that given the wider community and environmental benefits that would be gained by the Te Kāuru approach, the funding model was considered appropriate.

32. Federated farmers (and the rural landowners in the Wairarapa who expressed support for their submission) showed their support for this proposed change and the rationale for improving this funding method, and supported the proposed changes for spreading costs across a wider ratepayer base.

33. Opposition for this funding method proposal was received due the disagreement about who benefits from the activity and who should be paying.

34. This opposition continues from the 2018 consultation which saw Councils retract its proposal at the time. That proposal was “*New targeted rates for flood protection: 70% rate funding from catchment based on calculated ECV and location. This includes flood protection - property rates where applicable. 30% rate funding from region*”.

35. Submitter #4 claims Greater Wellington should be advocating and discouraging people from living and developing near to rivers as there is no financial incentive to do otherwise as river activities will be mostly funded by people who live nowhere near rivers and have no say in the work programmes.

36. The submitters claims that, "The introduction of a new targeted rate based on capital value is illogical, not equitable, transparent, nor defensible".

37. The argument that ratepayers are levied 'exactly the same' rates as properties of equivalent value in the identified flood hazard zone is viewed as unfair and does not align with insurers who utilise flood maps to determine property risks.

Flood protection - Waiōhine River Plan

38. Do you support the "Flood protection - Waiōhine River Plan" proposed funding method?

6 Yes	**0** No	**10** No Comment/Unsure

39. This proposal is strongly supported, particularly from the Waiōhine Action Group (WAG), who have worked with Greater Wellington officers and the community to develop.

40. The Plan has already had a specific public consultation which discussed the options for funding methods. The funding method strongly supported by the community in that consultation is what Councillors selected as their preferred funding method option here.

41. The cost of this activity is relatively low, therefore the 'Up to 50% general rates' portion has appeared to have gone astray with other submitters, however, it is yet another example of new and/or cumulative rates as discussed in paragraphs 59-61.

The Stadium

42. Do you support "The Stadium" proposed funding method?

2 Yes	**0** No	**12** No Comment/Unsure

43. The business community express their support for targeted rates, however, find it difficult to express their support for a new 'stadium rate' without having any knowledge of what the rate is actually paying for. Submitters express concern for if there are other reasons for why the funding is needed, other than merely "resiliency and safety."

44. A specific recognition for communities that receive 'little to no benefit' from the Stadium has been expressed, stating that the 0.5 differential is still proportionally too high for communities such as Ōtaki and remote rural residents in the Wairarapa.

45. The differentials proposed have not considered how Wellington City Council would rate for its portion of the costs. Proposing a disproportionate portion of the costs to Wellington City and its CBD, without considering Wellington City Council rates, can result in a disproportionate amount of rates being collected from Wellington City and its CBD for the Stadium.

Public Transport

46. Do you support the "Public Transport" proposed policy changes?

6 Yes	**1** No	**14** No Comment/Unsure

47. The business/property sector expresses concern for the removal of the differentials from the 2022 R&FP, allowing them to be reviewed annually through the Annual Plan and Metlink Public Transport consultations.

48. The business community seeks longer ‘certainty’ and fear the changes can result in a lack of business thriving in the Region.

49. Communities seek assurance the proposed change to remove the differentials from the 2022 R&FP will not negatively impact long-term changes and improvements. It is important the aggregation principle is applied across the region towards the improvement of services to appropriately support the current and future community requirements, considering population growths.

50. Stakeholders expressed concerns that annual fluctuations in differential (or even funding model) will occur, causing greater uncertainty for business and claim changes such like these have a high likelihood that Wellington City businesses will be worse off.

51. Besides the proposed changes to the 2022 R&FP, stakeholders appear to be more concerned about the targeted differentials being set the way they currently are.

52. Wellington CBD currently has a target differential of 7, which the chamber of commerce states ‘cannot be sustained’. The current amount is an excessive subsidy from Wellington CBD based businesses to other user groups.

53. Submitter #8 says “business operators are only one stakeholder group that benefits from the transport infrastructure and the benefit is not disproportionately in their favour, whereas the targeted rate is disproportionately weighted to them.”

54. Remote rural landowners are also regarded as unfairly targeted for, as the financial impacts analysis shows a remote rural landowner paying $2,600 p/a, and a rural ‘lifestyler’ paying only $60 p/a (Note, rural landowners, regardless if it is a farm or not, are not charged a ‘business category’ rate, and receive only ‘rural category’ rates)

55. The Federated farmers and rural landowners call for Council to undertake the transparent analysis of rating tools and rating impacts of Public Transport to inform decision-making.

56. There is acknowledgement that Council is grappling with the financial fallout from the COVID-19 pandemic as passenger revenue is only about 60 percent of pre-COVID revenue. It is urged that Council bite the bullet sooner rather than later, against the risk of disproportionate draws on either reserves or ratepayers.

Other commentary made

57. Submitters were also able to provide more commentary on their views of the proposed 2022 R&FP. Many have shared their opinions on other issues that were not proposed in the 2022 R&FP consultation.

58. A summary of key submission themes is outlined below. GW officers have prepared draft responses to the key issues and questions raised during the consultation which will be tabled at the hearings to help inform councillors (see **Attachment 2**). The key issues are as follows:

Cumulative rates and fee

59. Inflation is increasing and the conversations around 'unaffordability' are a daily news item as rate payers are not only facing the impacts of the COVID-19 pandemic but also an increasing multitude of costs due to domestic and international pressures.

60. These rising costs and the cumulative impacts may quickly see business decline with the Region.

61. The cumulative costs include such things as:
    - a Rate increases outlined in the Greater Wellington and Territorial Authority Annual Plan and Long Term Plans.
    - b Increased differential rates and new differential rates (such as the Stadium)
    - c New levies (such as Wellington City's proposed Sludge minimisation facility)
    - d Increased encroachment fees
    - e The unknown funding mechanisms associated with Let's Get Wellington Moving
    - f Other changing sectors, such as Three Waters and not knowing what new costs will be and how much they will be.

General rates

62. The increasing shift from targeted rates onto the 'general rates' is increasingly raising concern for rate payers, particularly those in lower socio-economic environments, and those with greater values and differentials applied.

63. Wellington City, with its higher population and property values, as well as the Wellington CBD have a 1.7 differential on its general rates, the consequence of the proposals could be harmful to Wellington City Council's effort to revive the city centre after enduring over two year's of the COVID-19 pandemic and the recent protest on Parliament ground.

64. The overall affordability concern is an increasing issue, particularly for communities, such as those in Porirua and Ōtaki who have lower average incomes than both the regional and national averages. The concern that these residents were not taken into account during the process to review who pays what for the activities outlined in the Long Term Plan.

65. Ōtaki was identified in the December 2020 '*Infometrics* rates affordability study' as one of the top four areas of the district with the highest overall rates as a percentage of median household income.

66. A common message is that 'the use of funding needs to be transparent'.

Uniform annual general charge

67. The first misconception regarding 'uniform annual general charges' (UAGCs), is that GW utilises them and are proposing to remove them. This is not the case, as GW does not use UAGCs for the reasons communicated during consultation.

68. Stakeholders, such as Federated Farmers, rural landowners and business/ commercial rate payers, argue the need for a UAGC to be utilised.

69. Services such as Democratic Services, Emergency Management, Relationship with Mana Whenua and Māori, Regional Planning and other activities that the benefits are undeniably accrue to the entire regional population should be funded using a fair method.

70. The example of a farmer paying over $12,000 p/a, and a lifestyle block paying $400 p/a, expresses the extreme difference in contributions to the same services and benefits.

71. During the consultation, this issue was discussed directly with Councillors, and a request for an analysis before the Committee meeting on 17 May 2022 was made. A formal response was provided to the Federated Farmers "Greater Wellington does not hold this information, and does not have the resources to complete this by 17 May without impacting on other essential work. We intend that this matter be included in the preparation of the Long Term Plan 2024-34."

Ngā hua ahumoni
Financial implications

72. Any decisions made in relation to the public feedback on any of the proposed funding methods has potential to negatively impact particular communities in the region. The full extent of the financial impacts will be determined following the Committee deliberations and will be reported to Council at the 16 June 2022 Council meeting.

Ngā Take e hāngai ana te iwi Māori
Implications for Māori

73. The proposed 2022 R&FP has the same implications for Māori as non-Māori, however, proposed changes, such as spreading rates across a wider catchment of ratepayers for things like catchment schemes and biodiversity, generally improves outcomes for Māori landowners who may be more concentrated in rural/remote places in the region that may have been subject to higher targeted rates.

74. Greater Wellington is also reviewing its Rates Remissions on Māori Land Policy which seeks to identify eligible Māori land for rates remissions and the criteria needed to qualify for a remission in order to better support Māori landowners to care for and utilise their land in accordance with their aspirations and values. This does not affect the Revenue and Financing Policy but provides a pathway for rates relief for Māori landowners

Ngā tikanga whakatau
Decision-making process

75. The matters requiring decision in this report were considered by officers against the decision-making requirements of Part 6 of the Local Government Act 2002.

Te hiranga
Significance

76. Officers considered the significance (as defined by Part 6 of the Local Government Act 2002) of these matters, taking into account Council's *Significance and Engagement*

Policy and Greater Wellington's *Decision-making Guidelines*. Officers recommend that these matters are of high significance, as the proposed 2022 R&FP submissions and hearing process meets our statutory obligation to provide a fair opportunity for the public to have their say on the 2022 R&FP.

Te whakatūtakitaki
Engagement

Iwi engagement

77. No specific iwi engagement was conducted due to the fact that the Rates Remission on Māori Freehold Land was also being consulted on. That consultation was directly targeted at the Māori community, so the 2022 R&FP consultation was included in their information package.

Public engagement

78. The public consultation was digitally led, utilising online tools, such as, Have Your Say, Email, MS Teams, Zoom, social media and media releases.

79. 'Have Your Say' had 108 visitors and 54 downloads of the consultation information. Only five submissions were received via 'Have Your Say'. This may or may not have been due to the registration process putting people off, or people not being provoked by the information they saw, as people tend to submit when they don't like something instead of when they are in support.

80. Leading up to the consultation period, discussions were held with various stakeholders to ask for help in getting the message out that we are consulting on the 2022 R&FP. Some stakeholders, such as the Chamber of Commerce and Federated Farmers, used their networks to promote the consultation, significantly improving GW's reach.

81. Public engagement activities during the consultation included were minimal. Due to COVID-19 traffic light level 'Red', no face-to-face events could take place. Instead, a public meeting on MS Teams was held to give the public an opportunity to ask Councillors questions.

82. The online meeting had a very low number of public participants. This is mainly due to short notice of the meeting happening, the meeting taking place during work hours, and our inability to effectively advertise and attract the general public to an online meeting about rates.

Ngā tūāoma e whai ake nei
Next steps

83. The Committee will:

    a Deliberate on the submissions received and heard, and agree on the recommendations for any changes to the proposed 2022 R&FP on 17 May 2022

    b Provide a report to Council on 16 June 2022 with the committee recommendations for the final 2022 R&FP.

84. The final 2022 R&FP and the report will be prepared by officers for Council's approval at its meeting on 30 June 2022 alongside the Rates Remission on Māori Freehold Land Policy and the 2022/23 Annual Plan.

Ngā āpitihanga
Attachments

Number	Title
1	Submissions received document
2	Submission responses from officers (to be tabled at meeting)

Ngā kaiwaitohu
Signatories

Writer	Kyn Drake – Project Manager, Revenue and Financing Policy review
Approver	Alison Trustrum-Rainey – Chief Financial Officer Sue McLean – General Manager, Corporate Services

He whakarāpopoto i ngā huritaonga **Summary of considerations**
Fit with Council's roles or with Committee's terms of reference The Local Government Act 2002 requires Council to update their financial policies at least once every five years (usually in line with the Long Term Plan every three years). Providing the general public with the opportunity to speak to their submissions is required before a final R&FP can be approved. This report provides the analysis of the public submissions to support the information the Committee will hear through the hearings.
Contribution to Annual Plan / Long Term Plan / Other key strategies and policies The consultation contributed 16 submissions that help inform the 2022 Funding and Financial Policies Hearing Committee as they make decisions that will determine the final 2022 R&FP.
Internal consultation Environment, Corporate Services, Finance, Flood Protection, Land Management, Metlink Public Transport, and Democratic Services, were consulted in the preparation of this report.
Risks and impacts - legal / health and safety etc. There are no identified risks relating to the content or recommendations of this report.

Attachment 1 to Report 22.183

Greater Wellington
Te Pane Matua Taiao

2022 Proposed Revenue and Financing Policy

<u>Submissions Received</u>

Public Consultation 21 March – 20 April 2022

(Extensions given until 24 April 2022)

Contents

Attachment 1 to Report 22.183

Submission #1 - Property Council New Zealand

Email
19 April 2022, 11.32am

Property Council New Zealand

Submission on

Proposed changes to Greater Wellington Regional Council's Revenue and Financing Policy

19 April 2022 **For more information and further queries, please contact**
Sandamali Gunawardena
Sandamali@propertynz.co.nz
0210459871

Proposed changes to Greater Wellington Regional Council's Revenue and Financing Policy

1. Summary

1.1 Property Council Wellington Branch ("Property Council") welcomes the opportunity to provide feedback on the proposed changes to Greater Wellington Regional Council's Revenue and Financing Policy ("the policy"). We do not support the removal of the Public Transport rating differential from the policy and the proposed introduction of the Wellington Regional Stadium differential targeted rate.

2. Recommendations

2.1 At a high level, we recommend that Greater Wellington Regional Council:

- Does not remove the public transport differential from the Revenue and Financing Policy;
- Provides the property sector with more information as to when and how the Wellington Regional Stadium (Sky Arena) targeted rate will operate followed by a more detailed consultation; and
- Work with Wellington City Council to provide information to the property sector explaining what the overall rates increases will mean for different sectors within Wellington.

3. Introduction

3.1. Property Council is the leading not-for-profit advocate for New Zealand's most significant industry, property. Our organisational purpose is, "Together, shaping cities where communities thrive".

3.2. The property sector shapes New Zealand's social, economic and environmental fabric. Property Council advocates for the creation and retention of a well-designed, functional and sustainable built environment, in order to contribute to the overall prosperity and well-being of New Zealand.

3.3. Property Council is the collective voice of the property industry. Property is the fourth largest industry in Wellington. There are around $40.4 billion in property assets across Wellington, with property providing a direct contribution to GDP of $4 billion (10 percent) and employment for 20,640 Wellington residents.

3.4. We connect property professionals and represent the interests of 134 Wellington based member companies across the private, public and charitable sectors.

3.5. This document provides Property Council's feedback on the proposed changes to Greater Wellington's Revenue and Financing Policy. Comments and recommendations are provided on issues relevant to Property Council's members.

4. Regional Economic Development

4.1. We are glad to see that there will be "little to no change for commercial/business across the region" if the Regional Economic Development funding method is changed. The consultation document has demonstrated this with a bar graph diagram however it would be appreciated if the Greater Wellington Regional Council could confirm this by providing the property sector with evidence of this reflected in dollar and percentage figures.

5. Public Transport Rating Differential

5.1. Property Council opposes the removal of the public transport differential from the policy to the Funding Impact Statements in the 2022/23 Annual Plan. The Council's proposed ability to change the differential on an annual basis, which is normally assessed every three years with the Long-Term Plan, does not provide the property sector will medium term certainty and will see a lack of business thriving in the Greater Wellington region.

6. Wellington Regional Stadium (Sky Stadium)

6.1. Greater Wellington Regional Council is looking to reintroduce a new funding method for the Wellington Regional Stadium via a targeted rate. Property Council has long supported targeted rates as a mechanism to collect rates from those who benefit and ringfence the spending on a particular project. Targeted rates provide ratepayers with certainty as to what project/s they are spent on.

6.2. Currently the proposal lacks detail as to what the funding tool will provide apart from "resiliency and safety." For our members to be able to advise further, we would need to have more detail than is currently set out. We recommend Greater Wellington Regional Council investigates this further, with a more detailed consultation on what the targeted rates would be used for and explain if there are other reasons as to why the funding is needed, prior to making any decisions.

7. Cumulative rates and fee increases in Wellington

7.1. In the current climate, the commercial sector is not only facing the impact of COVID-19 but an increased multitude of costs. The impact of accumulative costs may result in businesses declining within the Greater Wellington Region. The below list is an example of some proposed cost increases and fees in Wellington:

- Wellington City Council's proposed Annual Plan rates increase of 8.9%;
- Wellington City Council's proposed Annual Plan rates differential increase from 3.2 to 3.7;
- Wellington City Council's proposed Sludge minimisation facility rates levy;
- Wellington City Council's increase in development contribution levies;
- Wellington City Council's increase in encroachment fees;
- Wellington City Council investigating a commuter parking levy of up to $2,500 per annum;
- Greater Wellington Regional Council's proposal to increase rates differentials on a yearly basis;
- Greater Wellington Regional Council's Sky stadium differential targeted rate;
- Greater Wellington Regional Council's proposal to remove the uniform annual general charge which shifts more of the rating burden onto the commercial sector; and
- Unknown funding mechanisms associated with Let's Get Wellington Moving.

7.2. All these various proposals are creating an uncertain and challenging post COVID-19 environment for the commercial sector in Wellington.

7.3. We urge that Greater Wellington Regional Council work with Wellington City Council to provide information explaining what the overall rates increases will mean for different sectors within Wellington. We also wish Greater Wellington Regional Council takes the above examples into account before considering adopting the Sky Stadium differential targeted rate and removing the public transport differential from the policy.

Attachment 1 to Report 22.183

8. Uniform Annual General Change – UAGC Rates

8.1. Property Council opposes the removal of the uniform annual general charge as this will reproportion rates towards the commercial industries (which includes the commercial property sector, business and industrial sector). Given that the UAGC funds general council services that predominantly benefit residential ratepayers, it is disproportionate to remove the uniform annual general charge.

9. Conclusion

9.1. We do not support the removal of the Public Transport rating differential from the policy, the proposed introduction of the Wellington Regional Stadium rating differential nor the proposal to remove the uniform annual general charge.

9.2. Property Council members invest, own, and develop property in Wellington. We wish to thank Greater Wellington Regional Council for the opportunity to submit on the proposed changes to Greater Wellington's Revenue and Financing Policy as this gives our members a chance to have their say in the future of our city.

9.3. Any further enquires do not hesitate to contact Sandamali Gunawardena, Advocacy Advisor, via email: sandamali@propertynz.co.nz or cell: 0210459871.

Yours Sincerely,

Gerard Earl
Wellington Committee Chair
Property Council New Zealand

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Attachment 1 to Report 22.183

Submission #2 - KCDC

Email
19 April 2022, 4.19pm

Dear Mr Ponter

Kāpiti Coast District Council submission on the Greater Wellington 2022 Revenue and Financing Policy

Thank you for the opportunity to submit on the Greater Wellington 2022 Revenue and Financing Policy (the Policy).

We have a level of concern with the direction over the increasing levels of revenue gathering through the general rate. Our concern derives from a consideration of the overall affordability of the rating burden on our district's ratepayers which we also emphasised in our submission to Greater Wellington Regional Councils' Long-term Plan 2021-2031.

In that submission Kāpiti Coast District Council (Council) highlighted its ongoing concerns of increasing rates impacts on Kāpiti residents; and that residents' ability to pay was not taken into account during the process. While capital values for housing have increased significantly across the district in the last few years, Kāpiti continues to have lower average income levels than both regional and national averages, with areas of significant deprivation, and a high proportion of our ratepayers on low and/or fixed incomes.

These impacts affect our Ōtaki residential ratepayers in particular. Based on the supporting information document, **Ōtaki is the fourth highest in terms of percentage increase impacts across the region** under this proposal. Ōtaki was also identified in the latest *Infometrics* rates affordability study carried out for Council in December 2020 as being in the top four areas of the district with the highest rates as a percentage of median household income. While the level of rating changes may appear small, under Section 101(3)(b) of the Local Government Act, consideration must be given to 'the overall impact of any allocation of liability for revenue needs on the current and future social, economic, environmental, and cultural well-being of the community'. Increasing affordability pressures, and ongoing concerns relating to the levels of service Ōtaki receives comparably as a member of the region requires careful acknowledgement or steps to reflect residents' ability to pay as part of this Policy and Revenue and Financing review.

We therefore note with concern the proposed changes to the Policy that shift rating burdens to the general rate and away from targeted rates for activities and services that clearly have a level of identifiable beneficiaries. Examples of these are the Land Management rate, Stadium rate and Predator Control Programme rate.

While proposed as a general rate, differentials are also proposed as part of the future funding for the **Wellington Regional Stadium**. While not being actioned yet, we note a 0.5 differential rate is proposed for all Kāpiti residents' future contribution towards the stadium. This recognises the district's proximity and access to the stadium compared to other parts of the region. While providing a measured approach, we believe there needs to be specific recognition of Ōtaki, who at the northern edge of the region, has no practical public transport access to the stadium or its services, which we believe warrants a lower differential to the rest of the district.

While no financial changes are proposed to the **public transport** rate, we note that the differentials applied for funding will be moved from the Policy to the 'funding impact statement'. This is identified as helping the differentials being assessed each year during Annual Plan processes based on the provision of service and location. While we support a more responsive approach, as a broad principle, we seek assurance this will not impact long-term changes and improvements to public transport provision to the Kāpiti Coast district, and the Ōtaki Ward. It is important that the aggregation principle is applied across the region towards the improvement of services to appropriately support the current and future community needs of Ōtaki, in particular as the current population forecasts identify an anticipated 82% growth in population of Ōtaki over the next 30 years.

We note that the timing of this consultation on your Policy will impact our internal Council processes (having only received draft numbers from you in the last few days). Usually changes to a revenue and financing policy are made alongside the LTP process. Providing the information at this late stage has impacted our internal processes to reflect all proposed changes in the rating system with respect to rating impacts for our ratepayers for the 2022/2023 year.

We would like to work more closely with you to ensure we can help the Kāpiti Coast ratepayers understand changes and impacts – and emphasise support for residents in times of difficulty in light of Covid and increasing affordability pressures.

Conclusion

Kāpiti Coast District Council appreciates the opportunity to comment on the Greater Wellington 2022 Revenue and Financing Policy and we are happy to speak to our submission at the hearings.

We thank you for considering our feedback and hope you will look to address our concerns relating to the impacts and affordability of rates for Kāpiti Coast district ratepayers.

Yours sincerely

Wayne Maxwell

Wayne Maxwell
CHIEF EXECUTIVE
Te Tumuaki Rangatira

Attachment 1 to Report 22.183

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Submission #3 – Kate Reedy

Email Submission
19 April 2022, 8.38pm

I, Kate Reedy, Trustee of Pahaoa Station, located on the South-East Coast of South Wairarapa, and neighbour to Dan Riddiford, of Te-Awaite Station would like to put forward the following;

That I support the Submission on the Rating Review as put forward by Federated Farmers and Dan Riddiford – (Submissions due by Friday 22nd April)

I am happy for our rates demand information- Pahaoa and Glendhu Station, SWDC and GWRC to be viewed by GWRC officers and Federated Farmers (I can forward this information upon request)

Unfortunately, I am short of time hence this brief e-mail of support to above submitters. This I believe is a common problem many farmers share.

Thank you

Kate Reedy

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Attachment 1 to Report 22.183

Submission #4 – Ian Gunn

Have Your Say
19 April 2022, 9.37pm

What is your name?

Ian Gunn

Are you submitting on behalf of an organisation? (if yes, who?)

Waipoua Catchment Community group and Sustainable wairarapa Inc.

What is your email? (We will need this if you wish to speak to your submission)

[redacted]

Where in the region do you live?

Masterton

Are you a rate payer?

Yes

What kind of property do you own?

Residential

Do you want to speak to Council in support of your submission?

Yes

Do you support the "Flood Protection - Te Kāuru floodplain Management Plan" proposed funding method?

No

Any comment on the "Flood Protection - Te Kāuru floodplain Management Plan" proposed funding method?

Current river scheme ratepayers in Carterton and Masterton Districts are about to receive a huge reduction in their rates bill. Why? The Greater Wellington Regional Council proposes to use capital value as the basis of the new levy and apply it to all residents within the Ruamahanga river catchment in those districts. This means that all existing river scheme ratepayers will get a very dramatic reduction in their rates at a time when GW is advocating for increased funds from Central Government. GWRC has previously attempted to introduce this levy. Due to the response of the community this proposal was withdrawn with a promise of a review. It appears the old proposal has just been dusted off with no attempt to involve those about to receive this new charge. See footnote What will be the impact of this new charge? An analysis completed **at the time of the <u>previous proposal</u> showed** the following;

• CDC ratepayers will pay 80% of the river scheme programme ie $100,000 compared to the scheme ratepayers contributing just $20,000

• MDC ratepayers will pay 88% of the river scheme programme ie $160,00 compared to the scheme ratepayers contributing just $20,000

Note given the increases in capital value and new buildings it is highly likely that the actual levy will be a larger contribution. This levy will be on top of what these local authorities currently contribute, often up to 50% of the schemes funds to protect their assets such as; -Waingawa-upper Waingawa protection of the public water supply pipeline and the stop bank protecting Masterton (MDC) and protection of the East Taratahi water race (CDC). -mid Waingawa protection of the southern end of the runway at Hood aerodrome. Other utilities such as rail and road pay as and when required which is very infrequent. -Waipoua-MDC pay for the maintenance of the reach of the Waipoua downstream of the rail bridge to the confluence with the Ruamahanga river. This included the establishment of the rock weirs some years ago due to the degrading nature of this reach. -Upper Ruamahanga (upstream of Te Ore Ore bridge)- MDC protects the intakes to the water race network and the inlet to Henley Lake. Rathkeale College contributes to the cost of their stop bank. -Mid Ruamahanga-MDC protects a suite of assets including Henley Lake, cemetery, landfill and sewage treatment plant.

The introduction of a new targeted rate based on capital value is illogical, not equitable, transparent, nor defensible and should be withdrawn. The proposed targeted rate is actually a general rate in disguise. Its clear that GW considers that no one will oppose the proposal because the actual amounts for the large number of people who get an increase will be relatively small. The numbers of rating properties will increase from 600 odd to over 12000. The effect of this change is the opposite of what GW should be advocating which is discouraging people from living and developing near to rivers as there is no financial incentive to do otherwise as river activities will be mostly funded by people who live nowhere near rivers and have no say in the work programmes. The overall impression is that this change is being proposed for the convenience of GW people imposing a Wellington methodology rather than tailoring an appropriate rating method to the conditions on the ground.

Footnote; Thanks for the opportunity to attend a "Team Meeting " call at very short notice last week. What was very apparent to me is that GW has not researched our analysis provided when this proposal was first mooted. All of the GW personnel referred only to their initial reports from 2018? That there was

• widespread consultation-there has been NO individual correspondence to the ratepayers affected despite this significant change rating. This was reinforced to me today(19th April) by a Rangitane kaumatua who stated there has been NO communication with them since the last time the Council proposed this change,

• widespread support-of course the river scheme ratepayers are enthusiastic for a huge rate decrease,

• that it was a new approach to flood management which to my knowlege is still to be outlined in clear policy guidelines. Interestingly one of the key elements will be allowing lateral erosion. This is a fundamental aspect of the current rating methodology.

• complexity of the current rating methodology. As stated previously both methodologies have a framework which rarely changes rather each year dwellings are added or subtracted, subdivisions are created. Thus the proposed change has exactly the same complexity in management.

• reference to the Te Kauru report which clearly reinforces our argument in pages 32-34. This acknowledges the local authority contribution to the protection of their assets. This important contribution to these river schemes is excluded in the text of your new funding policy. Most of these schemes would not have survived without this contribution. The funding of these schemes was crafted with the full involvement of the scheme ratepayers and the local territorial authority to achieve viable schemes. As a ratepayer in MDC and KCDC i am levied exactly the same rates as properties of equivalent value in the identified flood hazard zone. However Tower Insurance tell me when I enquire about insurance that both of my properties have a low flood risk. This suggest GW isn't being professional with very low standards.

Prepared by Ian Gunn for the Waipoua Catchment Community Group and Sustainable Wairarapa Inc. Both parties have representatives of both local Iwi in the Wairarapa, engineers, farmers, environmentalists and urban ratepayers.

Attached original submission to this proposal follows SWI: The Impact of Basing Flood Protection Rates on Local Authority Area Capital Values. Introduction: The GWRC signalled in its recent long-term plan that it is planning to use CV as a basis for a targeted rate to fund all flood protection activities and to reduce the contribution of the funds generated by a general rate. Sustainable Wairarapa (SW) submitted against these changes. Following the decisions of council SW have researched how CV is currently utilized across the region and what the impact will be on the Wairarapa region in the future. This paper presents our findings using the 2016/17 rating data, current CV data and outlines the practice used to date within the Wairarapa to fund river schemes. Two graphs are presented to highlight the impact of CV with detailed tables appended to the paper. Findings: Graph no1 compares the respective contributions, as a percentage, in each local authority area. The asterix against the Wairarapa areas highlights the proposed targeted rate. It's clear that in the majority of the local authority areas that residents located outside the flood hazard zone (orange colour on graph) contribute the bulk of the funds. Those rate payers living outside of the flood hazard zones mapped by GW and inserted in local authority district plans pay between 48-88% of the targeted rate with the average being 72%. A grand total of 75,781 rating units. (see Appendix no2) Those living within the flood hazard areas defined by GW contribute 12-52% with an average of 28%. As a consequence, the beneficiaries of flood protection are receiving substantial subsidies. Also, the major funders of the flood protection work (those living outside of the flood hazard zones) have no say in either the quantum or type of works undertaken. Graph no2 plots the actual dollars raised using CV in the flood hazard and outside the flood hazard zones Again there is a significant difference apart from SWDC. In total $6.68M is generated, $2.44M from the flood hazard zone and $4.24M from outside the flood hazard. It is noteworthy that in the Wairarapa scheme ratepayers will incur SIGNIFICANT REDUCTIONS in rates e.g. In MDC instead of $180,000 being rated from the river schemes only $20,000 will be levied on the scheme beneficiaries. The balance $160,000 will be collected from the wider community. Similarly, in KCDC $980,000 is levied on rating units designated as outside the flood hazard zone with only $160,000 being contributed by those located within the flood hazard zone. Appendix no1 includes the number of rating units. There is a total of 102,877 rating units with only 27,096 being situated in a flood hazard zone defined by GWRC. The remainder, some 75,781 are being rated to generate $4.24M. The number of rate payers within the Wairarapa are small (even in the SWDC given the scale of the LWVDS and the Waiohine). This has resulted in the quantum of the rates bill per rating unit being high. It is clear that using capital value as a basis for rating river schemes creates perverse and unintended consequences. As a result, this methodology is contrary to the rating powers act. Current River Scheme Funding Practise- Wairarapa . The methodology to date has had the following components;

• Independent river engineering and valuation advice.

• The involvement of a review committee comprising members of the river scheme, local authority and GW staff and politicians.

Attachment 1 to Report 22.183

• Development of options and selection of an agreed affordable design i.e. the river scheme decides its ability to pay while meeting the requirement of council to maintain the state of the assets. This requirement was adopted by council in the late 1990's.

• Creation of a rating classification built around the threat of bank erosion, river course change, flooding and a charge on dwellings situated within the flood zone.

• On completion the classification is forwarded to all scheme landowners for their comment. Landowners are encouraged to consider the mapping and to discuss the maps with the independent advisors.

• The likely changes to the rates were also forwarded to all the scheme members and if necessary formal hearings are conducted.

• After due consideration the proposal is put to a full scheme meeting.

• Note all the data is mapped on GIS and is easy to amend.

• Funding of the scheme is 50% from the general rate (across the whole of GW). The balance being scheme ratepayers, local authority contribution and any income from gravel royalties.

1. The local authorities contributed the 50% required for works to protect their assets such as; -Waingawa-upper Waingawa protection of the public water supply pipeline and the stop bank protecting Masterton (MDC) and protection of the East Taratahi water race (CDC). -mid Waingawa protection of the southern end of the runway at Hood aerodrome. Other utilities such as rail and road pay as and when required which is very infrequent. -Waipoua-MDC pay for the maintenance of the reach of the Waipoua downstream of the rail bridge to the confluence with the Ruamahanga river. This included the establishment of the rock weirs some years ago due to the degrading nature of this reach. -Upper Ruamahanga (upstream of Te Ore Ore bridge)- MDC protects the intakes to the water race network and the inlet to Henley Lake. Rathkeale College contributes to the cost of their stop bank. -Mid Ruamahanga-MDC protects a suite of assets including Henley Lake, cemetery, landfill and sewage treatment plant. -Lower Ruamahanga (downstream of Wardells bridge MDC has contributed to works that protect the road to Gladstone and CDC have contributed to protecting the road to the Cliffs. Note this is not an exhaustive list.

2. Successful schemes are built on excellent relationships with the landowners along the river, the prime beneficiaries of the river schemes.

3. It's clear from the practice outlined above that the beneficiaries are well consulted, they decide their ability to pay plus they pay for their flood protection works i.e. those landowners beside the river pay scheme rates, those in the town pay directly for the protection of their assets and the general public pay through their general rate for any ancillary benefits such as maintaining the economic fabric of the region and for the limited environmental benefits i.e. there is an equitable distribution of scheme resources. The Current GWRC Funding Policy The objectives for funding Flood Protection i.e. the river schemes, is laid out in the documents considered by council during the development of its long-term plan. They are as follows;

• Equitable

• Defensible based on the distribution of benefits

• Simple

• Transparent.

Sustainable Wairarapa (SW) believes that those river schemes currently being rated on CV DO NOT meet these objectives. SW would be pleased to see GW demonstrate that these objectives are being met as required by the funding policy. With regards to the Wairarapa River Schemes SW believes the current practice of rating complies with the above objectives. SW accepts that there is some complexity in determining the beneficiaries within some schemes. These can be modified as seen fit in consultation with the scheme members. Schemes such as the Lower Wairarapa Valley Development Scheme, one of the largest schemes within NZ, are complex. SW notes that local authorities' assets are already funded by the local authorities and so the proposed community rating mechanism is already in place in the Wairarapa. SW draws GWs attention to the fact that Environment Waikato use similar rating mechanisms to the Wairarapa. The argument that this methodology is expensive to administer does not stack up. With the rating and flood protection information on GIS systems the data can be merged very simply. In fact, using just the river scheme areas requires less adjustment than the whole of a district area. The use of CV for Flood Protection funding also appears to fail the funding strategy principles, which are;

• Transparent

• Prudent

• Fair

• Value for money SWs assessment of the CV mechanism to fund Flood Protection shows these principles are not being met.

Methodology To complete this assessment SW requested each local authority to merge its CV and flood hazard data (provided by GW for its district plan) and to compare this to the total districts CV. By subtracting the CV for the flood prone areas from the total CV for the district the scale of funding for these two areas is easily established. This data was made available promptly and without delay. Note that where floodplain management plans have been developed very detailed information is available to determine the beneficiaries of flood protection works. Comment: This paper has focused on the use of CV to generate a targeted rate to part fund flood protection activities. Other funds are generated by a general rate across the region and appropriate user pays funds. CV is the basis of the general rate funding also. Given that the contribution of WCC is substantial, suggested by flood protection staff of over 50%, plus PCC. Let's say 55% of the general rate this then compounds the contribution levied on parties outside of the flood hazard zone. In general rate terms the beneficiaries situated in the flood hazard zones as defined by GWRC, are contributing an even smaller portion of the funding of flood protection programmes. Again, this is a perverse and unintended outcome. Conclusion Using CV as a basis for collecting a targeted rate for flood protection does not comply with either the rating powers act nor GW's funding policies. It results in nearly 80,000 rating units located outside the flood hazard zones, defined by GW, being charged $4.24M. These rating units are being over rated for minimal benefit. Those rating units receiving the majority of the benefits only contribute 36% of the targeted rate-$2.44M. The current funding arrangements within the Wairarapa comply with both the rating powers act and GW's funding policy. All of the landowners along the river, local authorities and the general public pay based on the benefits they receive. Average figures highlight the contributions when a genuine beneficiary model is used to determine rating contributions for flood protection. Further analysis of the actual rating contributions will provide a better basis for comparison. The general rating mechanism increases the imbalance between the flood and non-flooding zones when the CV model is used. Request That GW demonstrate how the CV methodology complies with the current funding and legislative requirements. Prepared by Ian Gunn Peer reviewed Colin Wright With assistance of GIS officers in KCDC, Hutt City, UHC, SWDC, CDC and MDC.

Do you support the "Flood protection - Waiōhine River Plan" proposed funding method?

Yes

Any comment on the "Flood protection - Waiōhine River Plan" proposed funding method?

The WAG committee has worked diligently to represent the views of the Greytown community

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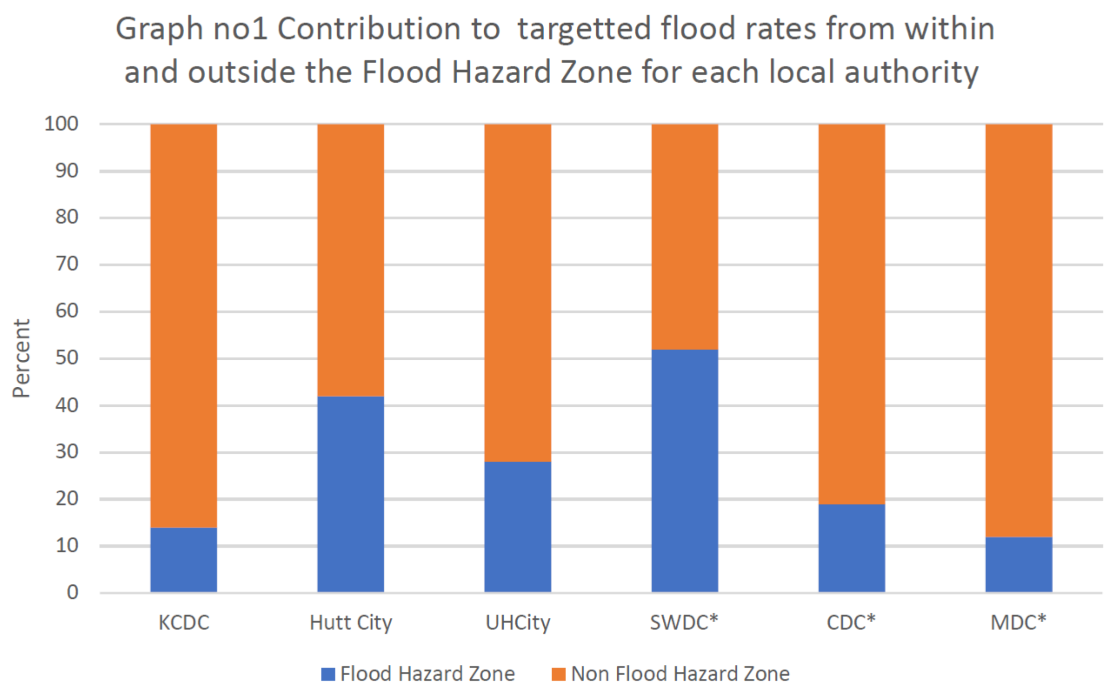
Do you have any other comments you would like to make about the proposed changes to the Revenue and Financing Policy?

You will note that Graph no 1 and 2 are not inserted in this submission. These graphs have been forwarded to KYN previously so he can provide them. Your submission document doesn't allow me to copy them into the submission. Many thanks Kyn

Attachment:

SWI: The Impact of Basing Flood Protection Rates on Local Authority Area Capital Values.

Introduction: The GWRC signalled in its recent long-term plan that it is planning to use CV as a basis for a targeted rate to fund all flood protection activities and to reduce the contribution of the funds generated by a general rate. Sustainable Wairarapa (SW) submitted against these changes. Following the decisions of council SW have researched how CV is currently utilized across the region and what the impact will be on the Wairarapa region in the future. This paper presents our findings using the 2016/17 rating data, current CV data and outlines the practice used to date within the Wairarapa to fund river schemes.
Two graphs are presented to highlight the impact of CV with detailed tables appended to the paper.
Findings:

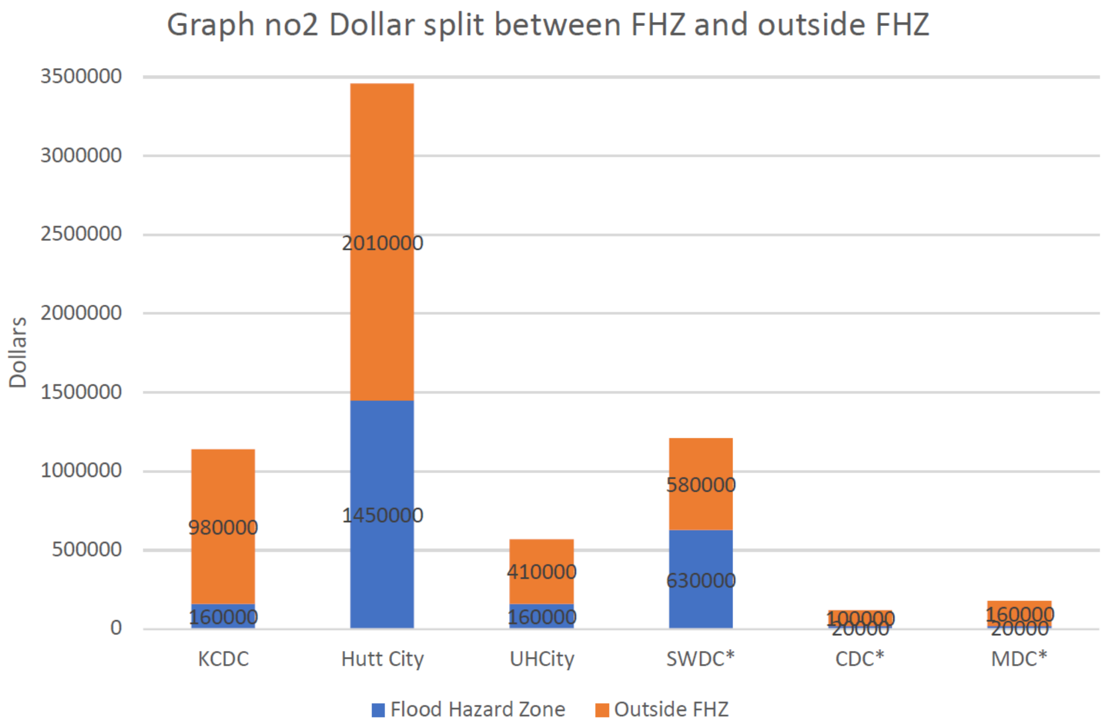


Graph no1 compares the respective contributions, as a percentage, in each local authority area. The asterix against the Wairarapa areas highlights the proposed targeted rate. It's clear that in the majority of the local authority areas that residents located outside the flood hazard zone (orange colour on graph) contribute the bulk of the funds.

Those rate payers living outside of the flood hazard zones mapped by GW and inserted in local authority district plans pay between 48-88% of the targeted rate with the average being 72%. A grand total of 75,781 rating units. (see Appendix no2)

Those living within the flood hazard areas defined by GW contribute 12-52% with an average of 28%.

As a consequence, the beneficiaries of flood protection are receiving substantial subsidies. Also, the major funders of the flood protection work (those living outside of the flood hazard zones) have no say in either the quantum or type of works undertaken.



Graph no2 plots the actual dollars raised using CV in the flood hazard and outside the flood hazard zones Again there is a significant difference apart from SWDC. In total $6.68M is generated, $2.44M from the flood hazard zone and $4.24M from outside the flood hazard.

It is noteworthy that in the Wairarapa scheme ratepayers will incur SIGNIFICANT REDUCTIONS in rates e.g. In MDC instead of $180,000 being rated from the river schemes only $20,000 will be levied on the scheme beneficiaries. The balance $160,000 will be collected from the wider community. Similarly, in KCDC $980,000 is levied on rating units designated as outside the flood hazard zone with only $160,000 being contributed by those located within the flood hazard zone.

Appendix no1 includes the number of rating units. There is a total of 102,877 rating units with only 27,096 being situated in a flood hazard zone defined by GWRC. The remainder, some 75,781 are being rated to generate $4.24M.

The number of rate payers within the Wairarapa are small (even in the SWDC given the scale of the LWVDS and the Waiohine). This has resulted in the quantum of the rates bill per rating unit being high.

It is clear that using capital value as a basis for rating river schemes creates perverse and unintended consequences. As a result, this methodology is contrary to the rating powers act.

Current River Scheme Funding Practise- Wairarapa
. The methodology to date has had the following components;

- Independent river engineering and valuation advice.
- The involvement of a review committee comprising members of the river scheme, local authority and GW staff and politicians.

- Development of options and selection of an agreed affordable design i.e. the river scheme decides its ability to pay while meeting the requirement of council to maintain the state of the assets. This requirement was adopted by council in the late 1990's.
- Creation of a rating classification built around the threat of bank erosion, river course change, flooding and a charge on dwellings situated within the flood zone.
- On completion the classification is forwarded to all scheme landowners for their comment. Landowners are encouraged to consider the mapping and to discuss the maps with the independent advisors.
- The likely changes to the rates were also forwarded to all the scheme members and if necessary formal hearings are conducted.
- After due consideration the proposal is put to a full scheme meeting.
- Note all the data is mapped on GIS and is easy to amend.
- Funding of the scheme is 50% from the general rate (across the whole of GW). The balance being scheme ratepayers, local authority contribution and any income from gravel royalties.

1. The local authorities contributed the 50% required for works to protect their assets such as;
   -**Waingawa**-upper Waingawa protection of the public water supply pipeline and the stop bank protecting Masterton (MDC) and protection of the East Taratahi water race (CDC).
   -mid Waingawa protection of the southern end of the runway at Hood aerodrome. Other utilities such as rail and road pay as and when required which is very infrequent.
   -**Waipoua**-MDC pay for the maintenance of the reach of the Waipoua downstream of the rail bridge to the confluence with the Ruamahanga river. This included the establishment of the rock weirs some years ago due to the degrading nature of this reach.
   -**Upper Ruamahanga** (upstream of Te Ore Ore bridge)- MDC protects the intakes to the water race network and the inlet to Henley Lake. Rathkeale College contributes to the cost of their stop bank.
   -Mid Ruamahanga-MDC protects a suite of assets including Henley Lake, cemetery, landfill and sewage treatment plant.
   -**Lower Ruamahanga** (downstream of Wardells bridge MDC has contributed to works that protect the road to Gladstone and CDC have contributed to protecting the road to the Cliffs. Note this is not an exhaustive list.

2. Successful schemes are built on excellent relationships with the landowners along the river, the prime beneficiaries of the river schemes.

3. It's clear from the practice outlined above that the beneficiaries are well consulted, they decide their ability to pay plus they pay for their flood protection works i.e. those landowners beside the river pay scheme rates, those in the town pay directly for the protection of their assets and the general public pay through their general rate for any ancillary benefits such as maintaining the economic fabric of the region and for the limited environmental benefits i.e. there is an equitable distribution of scheme resources.

<u>The Current GWRC Funding Policy</u>

The objectives for funding Flood Protection i.e. the river schemes, is laid out in the documents considered by council during the development of its long-term plan.
They are as follows;

- Equitable
- Defensible based on the distribution of benefits
- Simple
- Transparent.

Sustainable Wairarapa (SW) believes that those river schemes currently being rated on CV **DO NOT** meet these objectives. SW would be pleased to see GW demonstrate that these objectives are being met as required by the funding policy.

With regards to the Wairarapa River Schemes SW believes the current practice of rating complies with the above objectives. SW accepts that there is some complexity in determining the beneficiaries within some schemes. These can be modified as seen fit in consultation with the scheme members. Schemes such as the Lower Wairarapa Valley Development Scheme, one of the largest schemes within NZ, are complex.

SW notes that local authorities' assets are already funded by the local authorities and so the proposed community rating mechanism is already in place in the Wairarapa.

SW draws GWs attention to the fact that Environment Waikato use similar rating mechanisms to the Wairarapa.

The argument that this methodology is expensive to administer does not stack up. With the rating and flood protection information on GIS systems the data can be merged very simply. In fact, using just the river scheme areas requires less adjustment than the whole of a district area.

The use of CV for Flood Protection funding also appears to fail the funding strategy principles, which are;

- Transparent
- Prudent
- Fair
- Value for money

SWs assessment of the CV mechanism to fund Flood Protection shows these principles are not being met.

Methodology
To complete this assessment SW requested each local authority to merge its CV and flood hazard data (provided by GW for its district plan) and to compare this to the total districts CV. By subtracting the CV for the flood prone areas from the total CV for the district the scale of funding for these two areas is easily established. This data was made available promptly and without delay. Note that where floodplain management plans have been developed very detailed information is available to determine the beneficiaries of flood protection works.

Comment: This paper has focused on the use of CV to generate a targeted rate to part fund flood protection activities. Other funds are generated by a general rate across the region and appropriate user pays funds.

CV is the basis of the general rate funding also. Given that the contribution of WCC is substantial, suggested by flood protection staff of over 50%, plus PCC. Let's say 55% of the general rate this then compounds the contribution levied on parties outside of the flood hazard zone. In general rate terms the beneficiaries situated in the flood hazard zones as defined by GWRC, are contributing an even smaller portion of the funding of flood protection programmes. Again, this is a perverse and unintended outcome.

Conclusion
Using CV as a basis for collecting a targeted rate for flood protection does not comply with either the rating powers act nor GW's funding policies. It results in nearly 80,000 rating units located outside the flood hazard zones, defined by GW, being charged $4.24M. These rating units are being over rated for minimal benefit. Those rating units receiving the majority of the benefits only contribute 36% of the targeted rate-$2.44M.

The current funding arrangements within the Wairarapa comply with both the rating powers act and GW's funding policy. All of the landowners along the river, local authorities and the general public pay based on the benefits they receive. Average figures highlight the contributions when a genuine beneficiary model is used to determine rating contributions for flood protection. Further analysis of the actual rating contributions will provide a better basis for comparison.

The general rating mechanism increases the imbalance between the flood and non-flooding zones when the CV model is used.

Request
That GW demonstrate how the CV methodology complies with the current funding and legislative requirements.

Prepared by Ian Gunn
Peer reviewed Colin Wright
With assistance of GIS officers in KCDC, Hutt City, UHC, SWDC, CDC and MDC.

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Attachment 1 to Report 22.183

Submission #5 - Horipo Rimene

Have Your Say
20 April 2022, 8.34pm

What is your name?

Horipo Rimene

Are you submitting on behalf of an organisation? (if yes, who?)

Rangitane o Wairarapa

What is your email? (We will need this if you wish to speak to your submission)

horipo@rangitane.iwi.nz

Where in the region do you live?

Masterton

Are you a rate payer?

Yes

What kind of property do you own?

Residential

Do you want to speak to Council in support of your submission?

No

Do you support the "Regional Economic Development" proposed funding method?

Unsure

Any comment on the "Regional Economic Development" proposed funding method?

lack of consultation

Do you support the “Regional Predator Control Programme” proposed funding method?

Yes

Any comment on the “Regional Predator Control Programme” proposed funding method?

always happy to be rid off predators - region wide

Do you support the “Land Management” proposed funding method?

No

Any comment on the “Land Management” proposed funding method?

lack of consultation

Do you support the “Flood Protection - Te Kāuru floodplain Management Plan” proposed funding method?

No

Any comment on the “Flood Protection - Te Kāuru floodplain Management Plan” proposed funding method?

there was talk about a new propose funding method but there was NO clear statements/consultation with iwi or community.

Do you support the “Flood protection - Waiōhine River Plan” proposed funding method?

Yes

Any comment on the “Flood protection - Waiōhine River Plan” proposed funding method?

this plan was done with the community for the betterment of the community so Rangitane congratulate to all those that worked on the plan.

Attachment 1 to Report 22.183

Do you support "The Stadium" proposed funding method?

Unsure

Do you support the "Public Transport" proposed policy changes?

Unsure

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Attachment 1 to Report 22.183

Submission #6 - WAG

Email
20 April 2022, 12.44pm

Submission from the Waiohine Action Group on the Proposed Funding Policy for the Waiohine River Plan

This submission is from the Waiohine Action Group (WAG) which has about 200 members in the Waiohine River catchment area.

This community group was formed in 2016 because of major concerns in the Greytown / Carterton area about the earlier draft flood management plan proposed by GWRC for the Waiohine River. Subsequently, this draft plan was revoked and eight volunteers from WAG along with two GWRC officers have comprised the project team that created the new Waiohine River Plan which was approved by GWRC earlier this month.

WAG fully supports the proposed addition to the Revenue and Financing Policy in relation to implementation of the Waiohine River Plan. This funding proposal is in accordance with the recommendations in the now adopted River Plan.

WAG does not wish to speak in support of this submission.

Thank you

Colin Wright

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Attachment 1 to Report 22.183

Submission #7 - Baz Kaufman

Have Your Say
20 April 2022, 1.28pm

What is your name?

Baz Kaufman

Are you submitting on behalf of an organisation? (if yes, who?)

Wellington City Council

What is your email? (We will need this if you wish to speak to your submission)

baz.kaufman@wcc.govt.nz

Where in the region do you live?

Wellington

Are you a rate payer?

No Answer

Do you want to speak to Council in support of your submission?

No

Do you support the "Regional Economic Development" proposed funding method?

No

Any comment on the "Regional Economic Development" proposed funding method?

The proposal retains separate funding that recognises the levels of benefit are different for different ratepayer categories, ie, business and residential/rural. However, we do not agree that there is a strong rationale to argue that residential and rural rate payers receive approximately the same level of benefit and therefore should pay the same fixed rate. This ignores the fact that most of the rural landowners run the land as a business, rather than simply a residential. Therefore, they benefit greater from the regional economic development. The proposed policy (Page 10) also states that Council has decided not to use a UAGC because it is of the view the General rates recover the costs when the whole region benefits, and therefore these costs should be recovered by using taxation principles, and using solely capital values is the most appropriate method. It is not clear why is this principal ignored in retaining a fixed rate in this proposal.

Do you support the “Regional Predator Control Programme” proposed funding method?

No

Any comment on the “Regional Predator Control Programme” proposed funding method?

Greater Wellington Regional Council provides two pest management programmes - Regional pest management plan and Regional predator control programme. While both of them will generally contribute to the economic activity and improves environmental outcomes, the benefits of each activity are different and warrant different funding methods. Regional Predator Control Programme provides greater direct benefits to those rural properties than the flow on benefits to those urban residents. The funding methods should continue to reflect this. The proposal means that territorial authorities with a higher population and CV will be burdened by a great proportion of the costs. However, there is no evidence to support how ratepayers from these territorial Authorities are receiving more/enhanced pest control services to justify the shift to general rates. The proposed Revenue and Financing Policy has primary producers (page 23) identified as clear beneficiaries of this service. There is no stated rationale of how the whole community is the largest beneficiary of this service. It is also worth noting that the rating differential of CBD rate payers is 1.7 so they are already wearing a greater cost burden with no evidence of how CBD commercial rate payers benefit from this service.

Do you support the “Flood Protection - Te Kāuru floodplain Management Plan” proposed funding method?

No

Any comment on the “Flood Protection - Te Kāuru floodplain Management Plan” proposed funding method?

We recognise that the proposal will have minor financial impact on Wellington City - total contribution of $7,000 for year 1 and $16,000 for year 4. However, the Waiōhine River Plan has been publicly consulted on with the community of Greytown which received submissions in support of the stopbank and possible funding tools. Targeted 1,579 rating units have been identified. Therefore, it is consistent with the policy that the property owners and local communities should fund the project as they are the major and direct beneficiaries.

Do you support “The Stadium” proposed funding method?

No

Any comment on "The Stadium" proposed funding method?

We understand that this is a mechanism GWRC wants to put in place. There are no plans yet to actually introduce the rate. The Stadium is operated by the Wellington Regional Stadium Trust (Incorporated) that is established by both the Greater Wellington Regional Council and Wellington City Council. Both Councils are shareholders. While the proposal of cost spreading being based on proximity to the stadium show benefit and causation, the targeted differential on 2 for CBD businesses means that Wellington CBD rate payers will bear the overwhelming majority of the cost. While this is appropriate, this differential is being set in place without consideration of how Wellington City Council would rate for its portion of the costs The original shareholding recognised a city and a regional benefit with stadium activity, and the regional rate was designed to reflect that regional benefit. With the GWRC proposing a disproportionate portion of the costs sitting in Wellington and its CBD without considering Wellington City Council rates, the net impact will be a disproportionate amount of rates is collected from Wellington and its CBD for this activity. Any funding method related to the stadium should be further discussed with Wellington City Council before it is set in place.

Do you have any other comments you would like to make about the proposed changes to the Revenue and Financing Policy?

Background Greater Wellington is reviewing its Revenue and Financing Policy and proposing six changes to the policy. It is stated that the changes will keep the policy current with legislation, reduce inefficiencies and make the policy easier to understand and be utilised in a more transparent manner. Proposed changes to the policy in the consultation document include: • changes to the current funding method for: o Regional Economic Development o Regional Predator Control Programme o Land Management o Flood Protection – Te Kāuru Floodplain Management Plan • New funding method for: o Flood Protection – Waiōhine River Plan o Wellington Regional Stadium (Sky Stadium) Among these changes, proposed changes to Land Management and Flood Protection – Te Kāuru Floodplain Management Plan are not relevant to Wellington City as they only impact on other specified councils. Therefore, Wellington City Council will not comment on these two proposals, and will focus its submissions on the other four relevant proposed changes. The submission form can be assessed from: Revenue and Financing Policy | Have Your Say | Greater Wellington (gw.govt.nz) Submission on the changes General comments

Overall, the proposed changes seem to be skewing a greater proportion of costs towards Wellington City, in particular the Central Business District. This is an unfair burden on Wellington City ratepayers given the lack of identifiable benefits. It is also inconsistent with the legislative requirements for meeting the funding needs set out in the legislation and the Revenue and Financing Policy of the Greater Wellington Regional Council. The consequence of the proposals would be harmful to Wellington City Council's effort to revive the city centre after over two year's COVID-19 pandemic and the recent protest on Parliament ground. The consultation documents should make it clear what has triggered the review. While there is some high-level discussion of advantages and disadvantages of the changes, the rationale for changes is not always clearly articulated. As to its stated purpose of the changes, the documents has not specified whether the policy is not keeping current with legislation, what inefficiencies exist, which part of the policy is difficult to understand and what is not utilise in a transparent manner. In terms of legislation (section 101(3) (a) of the Local Government Act 2002), the main consideration for financial management have been specified and include: • the community outcomes • the distribution of benefits • the period in or over which those benefits are expected to occur • people's contribution to the need to undertake the activity; and • the costs and benefits of funding the activity distinctly from other activities. According to these considerations, it is only fair to link the funding to the identified beneficiaries as much as possible. There should be a strong argument against charging a rate for an activity that has no specific identified benefits for rate payers. The use of funding needs to be transparent.

Attachment 1 to Report 22.183

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Submission #8 – The Chamber

Email
20 April 2022, 4.06pm

Dear Committee,

Revenue and Financing Policy changes

Overview The Revenue and Financing Policy sets out how Greater Wellington (GW) will fund activities and the funding tools use, such as general rates, targeted rates, fixed rates, fees, and charges. This consultation looks to make changes to the way GW intends to fund some expenditure. The Chamber makes comment on the proposals below and has no comment to make on the other proposals.

We would like to note our thanks to the Greater Wellington Officers that have led the consultation and for meeting with the Chamber to facilitate further understanding of the proposals.

About the Chamber
The Wellington Chamber of Commerce (the Chamber) has been the voice of business in the Wellington region for 165 years since 1856 and advocates for policies that reflect the interest of Wellington's business community, in both the city and region and the development of the Wellington economy as a whole. The Chamber is accredited through the New Zealand Chamber of Commerce network and as part of our wider organisation is also one of the four regional organisations Commerce of BusinessNZ.

Through our three membership brands, the Wellington Chamber of, Business Central and ExportNZ, our organisation represents around 3,500 businesses across the central and lower North Island. In Wellington, our organisation represents over 1,300 business and organisation, accounting for 50,000 employees. Our organisation is one of the four regional organisations that make up the Business New Zealand family and is also accredited through the New Zealand Chambers of Commerce network.

The Chamber works closely with the GW to ensure Wellington's business community is consulted on the changes that impact them. Our advocacy remains consistent, and we continue to play a constructive role in the future development of our city.

Changes to information in the policy - Transport rate
The Chamber must once again put on the record and raise concern over the amount businesses pay towards the transport rate.

Wellington businesses have a huge stake in ensuring the wider region's public transport works – particularly given their financial contribution to the region's public transport rate. 39 per cent of regional funding is rated from Wellington businesses. This is an excessive subsidy from Wellington CBD based businesses to other user groups. It is a differential for Wellington businesses of seven to one - that cannot be sustained.
We continue to question the rationale for the impost on business, and the transparency of the methodology used to calculate this. The current amount is an excessive subsidy from Wellington CBD based businesses to other user groups.

As a principle, differential and targeted rating should be permitted only where a clearly identified community is provided with a distinctly different level of public goods from that of other ratepayers and the differential or targeted tax reflects the difference in the level of services. There should be an objective test with respect to 'benefits received' to ensure a consistency of approach.

For example, the building in which our organisation occupies a floor currently pays 85 per cent of its total GW rates bill towards the targeted transport rate alone - $55,069.26 of the total $64,531.38 rates bill.

We believe a well-developed transport system is vital for Wellington. Business operators have a direct interest in a sound, reliable public transport system that they, their customers, employees, and suppliers use daily. It is important for the city's future visitor economy which includes business, domestic and international visitors. Nonetheless, business operators are only one stakeholder group that benefits from the transport infrastructure and the benefit is not disproportionately in their favour, whereas the targeted rate is disproportionately weighted to them.

The current differentials are not appropriately set. Given GW continues to ignore this issue, we are concerned further about this proposal. The proposed policy change will mean that the differential will be considered in each Annual plan, rather than through this when the Revenue and Financing policy is reviewed every 3 to 5 years.

There is a possibility that approaching the differential through the Annual Plan may mean that the current excessive differential may be more easily addressed and rectified by Council but there is no indication from the Council that this is likely. We are concerned that instead annual fluctuations in differential (or even funding model) will occur, causing greater uncertainty for business. In summary, any changes such as this has a high likelihood that Wellington City businesses will be worse off.

The Chamber seeks assurance that the change to the funding process will not have such a perverse impact on businesses, and further, that policy work is underway to address the issues raised above and in previous submissions.

New funding methods – Wellington Regional Stadium (Sky Stadium)

The Chamber believes that the introduction of a new rate to support the Stadium ought to be considered as part of a wider discussion about the stadium activities and its structure rather than what appears to be a future enabling exercise.

For clarity, it is important to understand what the funding rated will be used for, given statements in the consultation material contemplate the future approach to funding somewhat obliquely.

For example, statements are made that "…*this does not mean we will start rating for the stadium*" and later comment is made that the rate is "…*to provide a mechanism that can be used in future if the council needs to rate for the stadium again. Any need for funding will be expressed in the Annual Plan.*"

The somewhat ambiguous language used in the document about the enablement of such a rate raises questions about the future approach.

Further, we would like to better understand how the benefit differentials were reached about this. We would note that the extent of the Wellington CBD Business area goes well beyond the stadium area as do the stakeholders that receive real benefit from this public entity. We note that the proposed policy states the separate funding rationale "attracted no additional benefits" other than the targeted rate as a mechanism.

Ngā mihi nui,

Simon Arcus

Chief Executive Wellington Chamber of Commerce

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Submission #9 – Catchment Scheme Chairpersons

Email
21 April 2022, 9.42am

Tēnā Koe

Revenue and Financing Policy – submission on proposed changes

Thank you for the opportunity to comment on proposed changes to GW's Revenue and Financing Policy.

Joint submission of six Catchment Scheme Chairpersons

This submission has been prepared jointly by the six eastern Wairarapa Catchment Schemes affected by the proposed changes to the Land Management funding method.

The signatories to this submission are:

- William Tatham, Chairperson, Homewood Catchment Scheme
- Edwin Bannister, Chairperson, Kaiwhata Catchment Scheme
- Charlotte McDonald, Chairperson, Maungaraki Catchment Scheme
- Charlie White, Chairperson, Whareama Catchment Scheme
- Rob Hickson, Acting Chairperson (on behalf of Alan Schofield), Mataikona Catchment Scheme
- Russel Busby, Acting Chairperson, Awhea/Opuawe Catchment Scheme

Each of us are representing our scheme Advisory Committees. We have endeavoured to discuss the matters within this submission with other scheme members and we are confident that our views are widely shared by our fellow scheme members.

If Council wishes to contact any of us regarding this submission, please contact us through GW staff that administer these schemes, in particular David Boone, Manager, Land Management.

Submission summary

We do not support the "Land Management" proposed funding method. We propose in this submission our preferred alternative method.

Background

Prior to expressing our concerns on the proposed "Land Management" funding method, it is important to begin with the history of these schemes.

The Catchment Schemes located in the eastern Wairarapa hill country are a long-standing partnership between the Regional Council and the residents within these scheme areas for the purpose of managing flooding and erosion risk. These schemes were established through old legislation, the Soil Page 2 of 4

Conservation and Rivers Control Act, 1941. That Act enabled the Catchment Board (since replaced by Regional Council) to establish a targeted rate within a defined area to deliver erosion and flood management services.

In New Zealand where there is no active scheme in place, generally the management of flood and erosion risk is a responsibility of the landowner alone. River and Catchment schemes exist where:

- there are resource management challenges, in particular flood and erosion risk, that are best managed as a collaborative community rather than as individual landowners with individual interests, and
- scheme establishment has been agreed in partnership between Council and scheme members, and
- scheme performance has endured to an acceptable standard so that both the Council and scheme members have opted to continue the scheme year after year. In the case of the eastern Wairarapa Catchment Schemes, since the 1950s/60s.

It is generally known that the Wairarapa Catchment Board, and subsequently the Regional Council has had many conversations with residents within defined river/catchment areas in regard to whether or not a catchment community would, or would not enter into a scheme to manage flood or erosion risk. In some communities, schemes have been established thus enabling a partnership model to manage community issues relating to flooding and erosion. Generally, once established schemes shall be maintained unless chosen to be disestablished by mutual agreement between Council and landowners within the scheme area.

We are interested in continuing the partnership model of our schemes and do not have any interest in disestablishing our schemes.

Impact of proposed Land Management funding method

We believe that, if implemented, the proposed Land Management funding method could lead to the end of our schemes as we know them. Therefore, we are not supportive of the proposed funding method.
The proposed funding method will result in spreading the “local share” (i.e. the revenue collected from the residents within the scheme area) across the entire District. Implications of this include:

A. The local scheme members who have been working with GW staff for decades to manage flooding and erosion risk within our schemes will have no greater financial stake in the scheme than any other resident in the District. Therefore, we feel that we will we lose control over directing scheme resources to the areas of greatest need within our scheme.
B. If the “local share” of revenue collected is from the entire District, we feel that this will create a valid argument that the area of services provided will no longer be the catchment boundary in which we have been delivering our scheme works programme for many decades. Rather the new “scheme boundary” could be interpreted to be the entire district.

We feel that if this were to eventuate, then the Council’s ongoing management of a District wide scheme would be untenable and would lead to the Council no longer having a meaningful presence in the management of flooding and erosion within our catchment area as has been the basis of our partnership for many decades.

Preferred alternative

We were approached by Council officers in November 2021 and informed of the need to simplify the rating method of our schemes. At that time we envisaged a change from the status quo rating method which involved many complex rating categories, shifting to a simplified single rating category based on property value. The key aspect of our considerations for potential change was that it maintained the existing scheme boundary and kept the “local share” local, within our schemes.

We request that Council reconsiders the current Land Management funding proposal. We would like Council to enable the following outcomes:

1. Simplify the status quo rating method as we are not supportive of high administration costs to maintain the current rating method. We suggest the solution which was discussed with Council Officers in November – that is, one rating class based on property value for land within the scheme area.
2. Retain each scheme's targeted rate to be collected from within the scheme area.
3. Continue the partnership arrangement embodied by these schemes, in good faith, with the original intent of these schemes - to assist scheme members with the management of flooding and erosion within our scheme area.

The implications of our suggested alternative funding method are:

- Scheme members within the scheme area will fund the "local share". This is a significant rating impact compared to Council's proposed change in that the scheme members will pay more as compared to the option of spreading the local share across the District. We are willing to pay more for the services we value, the services we have been partner to planning and delivering for decades.
- We will continue the original intent of these schemes – for Council to assist with the management of flooding and erosion within our scheme boundaries, not the entire District.

Do we want to speak to Council in support of your submission?
We are confident that Councillor Adrienne Staples understands the matters contained within this submission. We do not wish to speak in support of our submission, however we are happy to do so if Council wishes to speak with us.

Ngā mihi

In support of this submission:

Confirmed support via email to
GW Land Management, 20 April 2022
William Tatham
Chairperson, Homewood Catchment Scheme

Confirmed support via email to
GW Land Management, 18 April 2022
Edwin Bannister
Chairperson, Kaiwhata Catchment Scheme

Confirmed support via email to
GW Land Management, 7 April 2022
Charlotte McDonald
Chairperson, Maungaraki Catchment Scheme

Confirmed support via email to
GW Land Management, 7 April 2022
Charlie White
Chairperson, Whareama Catchment Scheme

Confirmed support via email to
GW Land Management, 20 April 2022
Rob Hickson
Acting Chairperson (on behalf of Alan Schofield)
Mataikona Catchment Scheme

Confirmed support via email to
GW Land Management, 7 April 2022
Russel Busby
Acting Chairperson, Awhea/Opuawe Catchment Scheme

Attachment 1 to Report 22.183

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Attachment 1 to Report 22.183

Submission #10 – Federated Farmers

Email
22 April 2022, 9.04am

Submission to:	Greater Wellington Regional Council
Re:	Proposed Revenue & Financing Policy 2022
Submission from:	Federated Farmers (Wairarapa-Wellington Province)
Address for Service:	Elizabeth McGruddy Senior Policy Adviser emcgruddy@fedfarm.org.nz 027 217 6732
Hearing:	We wish to be heard. We request consideration of a Wairarapa hearing.

SUBMISSION ON PROPOSED REVENUE & FINANCING POLICY 2022

INTRODUCTION

Federated Farmers welcome the opportunity to submit on the proposed Revenue & Financing Policy, following on from the detailed feedback we lodged in October 2021 in response to the Council survey and early engagement.

In that contribution, we welcomed the intent to undertake a first principles review and emphasised the need for more rigour and transparent analysis of where benefits and costs lie, against the current simple reliance on capital value for the majority of rates levied (Attachment One).

Following that submission, Federated Farmers also provided rates information for a number of farm properties highlighting the significant costs levied on farming families including for democratic and planning services, and for public transport; notwithstanding that public transport is principally (almost exclusively) an urban amenity, and that democratic and planning activities are undertaken in service of the population at large.

We record appreciation of the courtesy and professionalism of the project manager (Kyn Drake), and our thanks to Council for compiling the analysis of the proposed changes for the selection of farms we provided (Attachment Two), which we rely on in this submission.

EXECUTIVE SUMMARY

Federated Farmers generally welcome the proposed changes to targetted rates, consistent with the principle that costs should be spread more widely where benefits accrue more widely. Specifically:

- **Predator Control**: we support the proposed change (to 100% general rate) noting the wider benefits for biodiversity; and cognisant that, in the past, individual farmers have been heavily rated for no services received
- **Flood control, land management etc**: we acknowledge the rationale for amalgamating the multiple smaller targetted rates, and support the proposed changes for spreading costs across a wider ratepayer base
- **Economic Development**: we agree that urban and rural ratepayers should pay the same. We make the point that Federated Farmers challenged why rural ratepayers paid double the urban rate no less than ten years ago (2012 LTP Submission). We note that farms held in multiple titles may be rated multiple times (Attachment Two): we assume this is not the intent and recommend the policy be clarified to apply at the property level only.

Federated Farmers note the effect of these changes is broadly:

- A significant reduction in the very large targetted rates previously incurred by the small number of farm properties in the region
- Only very modest (minimal) changes for the wider ratepayer population (residential, lifestyle)

This result is witness to the power of the collective or the principle that many hands make light work:

- Across a ratepayer base in excess of 200,000 properties, costs can be spread to result in very little impact at the property level
- The key point is to undertake that analysis: we commend Council for investing in upgraded financial capabilities to facilitate analysis of the range of rating tools and options for funding Council services, and specifically commend the analysis undertaken in respect of the various targetted rates above

That analysis now needs to be applied to General Rates and Public Transport Rates:

- This review of the Revenue & Financing Policy is well overdue and currently the job is only half done
- Council has the ability – and the responsibility – to undertake the transparent analysis of rating tools and rating impacts to inform decision-making
- We acknowledge Council concern for “affordability” and make the point in the strongest terms that assumptions are not a substitute for evidence-based analysis

Federated Farmers call on Councillors to direct staff to prepare – in advance of the hearings:

- **General Rate: analysis of the rating impacts of use of UAGC in lieu of the general rate at 30% (the maximum allowable) or 20% (the average across other Councils)**

- **Public Transport: analysis of the rating impact of targetting this rate to urban ratepayers only, or alternatively a flat rural rate, ie, removal of the rural differential based on CV**

SUPPORTING INFORMATION

Attachment One provides a detailed discussion of rating tools against the rating principles set out in the Local Government Act and a critique of loose reliance on capital value (CV) as a proxy for income.

In respect of the **General Rate**, Attachment Two graphically illustrates that reliance on CV results in Farmer A paying over $12,000 pa for democratic services/relationships with maori/emergency management and other regional planning activities where the benefits incontrovertibly accrue to the population at large.

By contrast, Attachment Two also illustrates that a lifestyle block pays less than $400 pa for those exact same services. We suggest the CV on that property ($900k) may be broadly within the range of lifestyle/residential properties across the region.

Our first very simple question for Councillors is: on what basis have they determined that Farmer A should pay <u>every ten days</u> the same amount that a lifestyle or residential property pays once per annum?

In respect of **Public Transport,** Attachment Two shows that Farmer D pays $2600 pa while the lifestyler pays just over $60pa (acknowledging that urban residents may pay a little more than rural lifestylers).

Our second very simple question for Councillors is: on what basis have they determined that Farmer D should pay <u>40 times more</u> than a lifestyler (and x times more than an urban property)?

These are not questions which should be deferred to some future review.

At minimum, Council should apply the analysis of UAGC to the general rate immediately and make the results available prior to the hearing scheduled in mid-May. We acknowledge the results may serve either to support or modify Councils current position: either way, the decisions arising will be based on more than fresh air.

In respect of public transport, we acknowledge that Council is grappling with the financial fallout from Covid: passenger revenue is only 60% of pre-Covid levels and it would be a brave call to predict bounceback in the short or medium-term. Currently, central government is propping up the operation; and we note Councils intent that, if necessary, reserves may be utilised in the short-term to meet shortfalls. It is apparent that the business model has changed and we urge Council to bite bullets sooner rather than later if necessary, against the risk of disproportionate draws on either reserves or ratepayers.

Importantly however, this context is not reason to defer specific consideration of the disproportionate contribution from farmer ratepayers: that analysis can and should be done now, recognising that – as with predator control and economic development – reducing the inequitable public transport rates on a small number of farmers may result in only very minor increases for the much wider urban population.

Two Attachments were also provided

1. *Financial information (provided on next page)*
2. *Feedback submission on the R&FP during the early engagement process, October 2021.*

Attachment 1 to Report 22.183

Attachment - Financial information

GW region farm rates examples	District	District UAGC as % of total rate revenue	LV	CV	GWRC general rate Current	GWRC general rate Proposed	GWRC general rate Difference	GWRC public transport Current	GWRC public transport Proposed	GWRC public transport Difference
Large coastal S&B - 2947ha: Masterton VN 17970-15100	MDC	19.79%	$ 21,700,000	$ 28,450,000	$ 11,058.50	$ 11,176.52	$ 118.02	$ 2,102.50	$ 2,102.79	$ 0.29
Coastal S&B - 738ha: Masterton VN 17970-25900	MDC		$ 2,420,000	$ 2,740,000	$ 1,065.00	$ 1,076.40	$ 11.40	$ 202.50	$ 202.52	$ 0.02
Total farmer A					$ 12,123.50	$ 12,252.93	$ 129.43	$ 2,305.00	$ 2,305.30	$ 0.30
Arable- 222ha: Carterton VN 18170-03700B	CDC	27.79%	$ 6,890,000	$ 8,490,000	$ 3,299.21	$ 3,333.93	$ 34.72	$ 680.90	$ 680.14	-$ 0.76
Arable - 2ha: Carterton VN 18170-03700A	CDC		$ 18,000	$ 18,000	$ 6.92	$ 7.07	$ 0.15	$ 1.44	$ 1.44	$ 0.00
Arable-lease - 104ha: Carterton VN 18160-04600	CDC		$ 3,220,000	$ 3,770,000	$ 1,465.02	$ 1,480.44	$ 15.42	$ 302.35	$ 302.02	-$ 0.33
Arable-lease - 104ha: Carterton VN 18160-04601	CDC		$ 3,400,000	$ 4,130,000	$ 1,604.92	$ 1,621.80	$ 16.88	$ 331.23	$ 330.86	-$ 0.37
Total farmer B					$ 6,376.07	$ 6,443.24	$ 67.17	$ 1,315.92	$ 1,314.46	-$ 1.46
Dairy unit - 201ha: South Wairarapa VN 1825006900	SWDC	19.11%	$ 5,000,000	$ 5,140,000	$ 1,975.30	$ 1,996.38	$ 21.08	$ 429.76	$ 429.44	-$ 0.32
Dairy unit - 102ha: South Wairarapa VN 1829012500	SWDC		$ 3,160,000	$ 3,540,000	$ 1,360.42	$ 1,374.94	$ 14.52	$ 295.98	$ 295.76	-$ 0.22
Dairy unit - 108ha: South Wairarapa VN 1829006400	SWDC		$ 2,720,000	$ 3,480,000	$ 1,337.36	$ 1,351.64	$ 14.28	$ 290.96	$ 290.75	-$ 0.21
Grassland title - 38ha: South Wairarapa VN 1825006700	SWDC		$ 1,280,000	$ 1,320,000	$ 507.28	$ 512.69	$ 5.41	$ 110.37	$ 110.28	-$ 0.09
Grassland title - 19ha: South Wairarapa VN 1829001601	SWDC		$ 550,000	$ 590,000	$ 226.74	$ 229.16	$ 2.42	$ 49.33	$ 49.29	-$ 0.04
Total farmer C					$ 5,407.10	$ 5,464.80	$ 57.70	$ 1,176.40	$ 1,175.53	-$ 0.87
Remote coastal S&B - 2ha: South Wairarapa VN 1835009500	SWDC	19.11%	$ 60,000	$ 60,000	$ 23.47	$ 23.30	-$ 0.17	$ 5.66	$ 5.01	-$ 0.65
Remote coastal S&B - 1556ha: South Wairarapa VN 1835009800			$ 3,530,000	$ 4,090,000	$ 1,571.79	$ 1,588.56	$ 16.77	$ 341.96	$ 341.71	-$ 0.25
Remote coastal S&B - 2965ha: South Wairarapa VN 1835009400			$ 7,020,000	$ 7,670,000	$ 2,947.58	$ 2,979.04	$ 31.46	$ 641.29	$ 640.82	-$ 0.47
Remote coastal S&B - 55ha: South Wairarapa VN 1835010000			$ 389,000	$ 393,500	$ 151.22	$ 152.84	$ 1.62	$ 32.98	$ 32.88	-$ 0.10
Remote coastal S&B - 7ha: South Wairarapa VN 1839005307			$ 300,000	$ 310,000	$ 119.13	$ 120.40	$ 1.27	$ 25.92	$ 25.90	-$ 0.02
Remote coastal S&B - 106ha: South Wairarapa VN 1831015200			$ 3,050,000	$ 3,540,000	$ 1,360.42	$ 1,374.94	$ 14.52	$ 295.98	$ 295.76	-$ 0.22
Remote coastal S&B - 6444ha: South Wairarapa VN 1839003900			$ 12,250,000	$ 14,450,000	$ 5,553.14	$ 5,612.40	$ 59.26	$ 1,208.16	$ 1,207.27	-$ 0.89
Remote coastal S&B - 1ha: South Wairarapa VN 1839004200			$ 82,000	$ 91,000	$ 34.97	$ 35.34	$ 0.37	$ 7.10	$ 7.60	$ 0.50
Remote coastal S&B - 2ha: South Wairarapa VN 1839004100			$ 63,000	$ 64,500	$ 24.79	$ 25.05	$ 0.26	$ 5.39	$ 5.39	-$ 0.00
Remote coastal S&B - 2ha: South Wairarapa VN 1839004101			$ 65,000	$ 65,900	$ 25.33	$ 25.60	$ 0.27	$ 5.51	$ 5.51	-$ 0.00
Remote coastal S&B - 43ha: South Wairarapa VN 1839004000			$ 380,000	$ 384,500	$ 147.76	$ 149.34	$ 1.58	$ 32.15	$ 32.12	-$ 0.03
Total farmer D					$ 10,243.13	$ 12,086.81	$ 127.21	$ 2,471.76	$ 2,599.97	-$ 2.13
Dairy title - 149ha: South Wairarapa VN 1829008200	SWDC	19.11%	$ 4,600,000	$ 5,720,000	$ 2,198.20	$ 2,221.65	$ 23.45	$ 478.25	$ 477.90	-$ 0.35
Dairy title - 40ha: South Wairarapa VN 1823004000	SWDC		$ 1,130,000	$ 1,160,000	$ 445.79	$ 450.55	$ 4.76	$ 96.99	$ 96.92	-$ 0.07
Dairy title - 60ha: South Wairarapa VN 1829005901	SWDC		$ 1,620,000	$ 1,960,000	$ 753.23	$ 761.27	$ 8.04	$ 163.88	$ 163.75	-$ 0.13
Total farmer E					$ 3,397.22	$ 3,433.47	$ 36.25	$ 739.12	$ 738.57	-$ 0.55
Smaller coastal S&B - 816ha: Masterton VN 17970-14500B	MDC	19.79%	$ 3,967,000	$ 5,066,000	$ 1,969.20	$ 1,990.17	$ 20.97	$ 374.40	$ 374.44	$ 0.04
Smaller coastal S&B - 63ha: Masterton VN 17970-14500A			$ 63,000	$ 74,000	$ 28.80	$ 29.07	$ 0.27	$ 5.50	$ 5.47	-$ 0.03
Total farmer F					$ 1,998.00	$ 2,019.24	$ 21.24	$ 379.90	$ 379.91	$ 0.01
Samller coastal S&B + forest - 106ha: Masterton VN 18000-09801	MDC		$ 800,000	$ 1,080,000	$ 420.12	$ 424.28	$ 4.16	$ 79.92	$ 79.82	-$ 0.10
Total farmer G					$ 420.12	$ 424.28	$ 4.16	$ 79.92	$ 79.82	-$ 0.10
Lifestyle: Masterton VN 17940-18506	MDC	19.79%	$ 390,000	$ 910,000	$ 353.70	$ 357.49	$ 3.79	$ 67.30	$ 67.26	-$ 0.04
Total lifestyle					$ 353.70	$ 357.49	$ 3.79	$ 67.30	$ 67.26	-$ 0.04
					$ 40,318.84	$ 42,482.25	$ 446.94	$ 8,535.32	$ 8,660.82	-$ 4.84

GW region farm rates examples	Economic development rate Current	Economic development rate Proposed	Economic development rate Difference	Class rates Current	Class rates Proposed	Class rates Difference	Predator control Current	Predator control Proposed	Predator control Difference	Total Current	Total Proposed	Total Difference
Large coastal S&B - 2947ha: Masterton VN 17970-15100	$ 32.20	$ 17.25	-$ 14.95	$ 40.70	$ 133.54	$ 92.84	$ 3,751.20	$ -	-$3,751.20	$ 16,985.10	$ 13,430.10	-$ 3,555.00
Coastal S&B - 738ha: Masterton VN 17970-25900	$ 32.20	$ 17.25	-$ 14.95	$ 180.70	$ 12.86	-$ 167.84	$ 939.50	$ -	-$939.50	$ 2,419.90	$ 1,309.03	-$ 1,110.87
Total farmer A	$ 64.40	$ 34.50	-$ 29.90	$ 221.40	$ 146.40	-$ 75.00	$ 4,690.70	$ -	-$4,690.70	$ 19,405.00	$ 14,739.13	-$ 4,665.87
Arable- 222ha: Carterton VN 18170-03700B	$ 32.20	$ 17.25	-$ 14.95	$ 7,539.00	$ 378.28	-$ 7,160.72	$ 282.22	$ -	-$282.22	$ 11,833.53	$ 4,409.59	-$ 7,423.94
Arable - 2ha: Carterton VN 18170-03700A				$ 0.14	$ 0.14	$ 0.00	$ -	$ -	$0.00	$ 8.50	$ 8.65	$ 0.15
Arable-lease - 104ha: Carterton VN 18160-04600	$ 32.20	$ 17.25	-$ 14.95	$ 29.41	$ 29.46	$ 0.05	$ 131.91	$ -	-$131.91	$ 1,960.89	$ 1,829.17	-$ 131.72
Arable-lease - 104ha: Carterton VN 18160-04601	$ 32.20	$ 17.25	-$ 14.95	$ 440.68	$ 184.01	-$ 256.67	$ 132.85	$ -	-$132.85	$ 2,541.88	$ 2,153.93	-$ 387.95
Total farmer B	$ 96.60	$ 51.75	-$ 44.85	$ 8,009.23	$ 591.89	-$ 7,417.34	$ 546.98	$ -	-$546.98	$ 16,344.80	$ 8,401.34	-$ 7,943.46
Dairy unit - 201ha: South Wairarapa VN 1825006900	$ 32.20	$ 17.25	-$ 14.95	$ 2,916.20	$ 2,916.19	-$ 0.01	$ 255.60	$ -	-$255.60	$ 5,609.06	$ 5,359.26	-$ 249.80
Dairy unit - 102ha: South Wairarapa VN 1829012500	$ 32.20	$ 17.25	-$ 14.95	$ 1,842.27	$ 1,793.66	-$ 48.61	$ 129.92	$ -	-$129.92	$ 3,660.79	$ 3,481.61	-$ 179.18
Dairy unit - 108ha: South Wairarapa VN 1829006400	$ 32.20	$ 17.25	-$ 14.95	$ 511.67	$ 438.82	-$ 72.85	$ 137.95	$ -	-$137.95	$ 2,310.14	$ 2,098.46	-$ 211.68
Grassland title - 38ha: South Wairarapa VN 1825006700	$ 32.20	$ 17.25	-$ 14.95	$ 70.56	$ 70.56	$ 0.00	$ 48.97	$ -	-$48.97	$ 769.38	$ 710.79	-$ 58.59
Grassland title - 19ha: South Wairarapa VN 1829001601	$ 32.20	$ 17.25	-$ 14.95	$ 41.02	$ 41.02	-$ 0.00	$ 23.60	$ -	-$23.60	$ 372.89	$ 336.72	-$ 36.17
Total farmer C	$ 161.00	$ 86.25	-$ 74.75	$ 5,381.72	$ 5,260.25	-$ 121.47	$ 596.04	$ -	-$596.04	$ 12,722.26	$ 11,986.83	-$ 735.43
Remote coastal S&B - 2ha: South Wairarapa VN 1835009500	$ 32.20	$ 17.25	-$ 14.95	$ -	$ -	$ -	$ -	$ -	$0.00	$ 61.33	$ 45.57	-$ 15.76
Remote coastal S&B - 1556ha: South Wairarapa VN 1835009800	$ 32.20	$ 17.25	-$ 14.95	$ -	$ -	$ -	$ 1,980.59	$ -	-$1,980.59	$ 3,926.54	$ 1,947.52	-$ 1,979.02
Remote coastal S&B - 2965ha: South Wairarapa VN 1835009400	$ 32.20	$ 17.25	-$ 14.95	$ -	$ -	$ -	$ 3,774.13	$ -	-$3,774.13	$ 7,395.20	$ 3,637.10	-$ 3,758.10
Remote coastal S&B - 55ha: South Wairarapa VN 1835010000				$ -	$ -	$ -	$ 69.52	$ -	-$69.52	$ 253.72	$ 185.71	-$ 68.01
Remote coastal S&B - 7ha: South Wairarapa VN 1839005307				$ 43.93	$ 1.44	-$ 42.49	$ 8.79	$ -	-$8.79	$ 197.77	$ 147.74	-$ 50.03
Remote coastal S&B - 106ha: South Wairarapa VN 1831015200	$ 32.20	$ 17.25	-$ 14.95	$ 1,310.31	$ 1,261.71	-$ 48.60	$ 134.78	$ -	-$134.78	$ 3,133.69	$ 2,949.66	-$ 184.03
Remote coastal S&B - 6444ha: South Wairarapa VN 1839003900	$ 32.20	$ 17.25	-$ 14.95	$ 2,115.70	$ 2,017.97	-$ 97.73	$ 8,201.18	$ -	-$8,201.18	$ 17,110.38	$ 8,854.88	-$ 8,255.50
Remote coastal S&B - 1ha: South Wairarapa VN 1839004200				$ 12.01	$ 0.42	-$ 11.59	$ -	$ -	$0.00	$ 54.08	$ 43.37	-$ 10.71
Remote coastal S&B - 2ha: South Wairarapa VN 1839004100				$ 9.22	$ 0.30	-$ 8.92	$ -	$ -	$0.00	$ 39.40	$ 30.74	-$ 8.66
Remote coastal S&B - 2ha: South Wairarapa VN 1839004101				$ 9.52	$ 0.31	-$ 9.21	$ -	$ -	$0.00	$ 40.36	$ 31.41	-$ 8.95
Remote coastal S&B - 43ha: South Wairarapa VN 1839004000				$ 55.64	$ 1.78	-$ 53.86	$ 54.59	$ -	-$54.59	$ 290.14	$ 183.25	-$ 106.89
Total farmer D	$ 161.00	$ 86.25	-$ 74.75	$ 3,586.88	$ 3,283.92	-$ 272.41	$ 12,722.54	$ -	-$14,223.58	$ 32,502.61	$ 18,056.96	-$ 14,445.65
Dairy title - 149ha: South Wairarapa VN 1829008200	$ 32.20	$ 17.25	-$ 14.95	$ 3,303.15	$ 3,230.29	-$ 72.86	$ 189.97	$ -	-$189.97	$ 6,201.77	$ 5,947.09	-$ 254.68
Dairy title - 40ha: South Wairarapa VN 1823004000	$ 32.20	$ 17.25	-$ 14.95	$ -	$ -	$ -	$ 51.07	$ -	-$51.07	$ 626.05	$ 564.71	-$ 61.34
Dairy title - 60ha: South Wairarapa VN 1829005901	$ 32.20	$ 17.25	-$ 14.95	$ 1,144.20	$ 1,095.60	-$ 48.60	$ 76.56	$ -	-$76.56	$ 2,170.07	$ 2,037.87	-$ 132.20
Total farmer E	$ 96.60	$ 51.75	-$ 44.85	$ 4,447.35	$ 4,325.89	-$ 121.46	$ 317.60	$ -	-$317.60	$ 8,997.89	$ 8,549.67	-$ 448.22
Smaller coastal S&B - 816ha: Masterton VN 17970-14500B	$ 32.20	$ 17.25	-$ 14.95	$ 185.20	$ 23.78	-$ 161.42	$ 1,038.10	$ -	-$1,038.10	$ 3,599.10	$ 2,405.63	-$ 1,193.47
Smaller coastal S&B - 63ha: Masterton VN 17970-14500A	cont	cont	cont	$ -	$ -	$ -	$ 79.80	$ -	-$79.80	$ 114.10	$ 34.54	-$ 79.56
Total farmer F	$ 32.20	$ 17.25	-$ 14.95	$ 185.20	$ 23.78	-$ 161.42	$ 1,117.90	$ -	-$1,117.90	$ 3,713.20	$ 2,440.17	-$ 1,273.03
Samller coastal S&B + forest - 106ha: Masterton VN 18000-09801	$ 32.20	$ 17.25	-$ 14.95	$ 38.05	$ 5.07	-$ 32.98	$ 134.52	$ -	-$134.52	$ 704.81	$ 526.42	-$ 178.39
Total farmer G	$ 32.20	$ 17.25	-$ 14.95	$ 38.05	$ 5.07	-$ 32.98	$ 134.52	$ -	-$134.52	$ 704.81	$ 526.42	-$ 178.39
Lifestyle: Masterton VN 17940-18506	$ 32.20	$ 17.25	-$ 14.95	$ -	$ -	$ -	$ 6.60	$ -	-$6.60	$ 459.80	$ 442.00	-$ 17.80
Total lifestyle	$ 32.20	$ 17.25	-$ 14.95	$ -	$ -	$ -	$ 6.60	$ -	-$6.60	$ 459.80	$ 442.00	-$ 17.80
	$ 676.20	$ 362.25	-$ 313.95	$ 21,869.83	$ 13,637.21	-$ 8,202.07	$ 20,132.88	$ -	-$21,633.92	$ 94,850.37	$ 65,142.52	-$ 29,707.85

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NOTES:

Submission #11 – Matt & Bec Nicholson

Email
23 April 2022, 2.15pm

Matt & Bec Nicholson - Bush Gully Station

I agree with the recent submissions from the Federated Farmers and Dan Riddiford.

Their submissions highlight the need for a thorough review of rates especially around public transport, roading and predator pest control.

We live in Hinakura district on Bush Gully Road. 35km East of Martinborough. We strongly oppose these rate increases

1. **Roading**

We have lived here for over 10years now and have watched the roads totally deteriorate.

There has been little maintenance on our roads, and some obvious areas that need improvement. The whole district have approached the council numerous times about this, but unfortunately everything seems to keep getting stalled.

In Winter last year the road got to a stage that;

- We could no longer get the bus out, and families had to meet the driver at the worst part of the road, in order to get their kids home safely.
- Many businesses refused to drive vehicles out, because of the condition of the road. This in-turn affects our business, when we can’t get stock trucks to move stock.
- Not to mention the fact that it was a very unsafe road for all the local families to drive on.

When will we ever see the return on our current rates investment for roading?

2. **Pest Control**

Over the 10years we have lived here, we have not had any pest control done. We have watched possum numbers escalate out of control.

We have been told from OSPRI that we will not be trapped for at least another 5 years. With the possum numbers escalating, the risk to us of a TB outbreak in the future is growing. All our native planting and poplar plantings that we do for erosion, are getting stripped from all the possums. Not to mention the effect that it has had on the native birdlife.

We have been paying the Regional Possum/Predator Rate of 88cents/per ha across our 1360 hectare property to a total of $1,196.80 annually since the programme started. And this year just gone we had a massive increase in the rate??? So how can you justify increasing this again?

When will we ever see a return on our investment?

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We can not see how the council can justify a rate increase when the current services we are supposed to be getting from the council are inadequate.

We oppose all increases in the rates and also support the submissions of both Federated Farmers and Dan Riddiford as well.

If you have any queries, please don't hesitate to contact us.

Regards

Matt & Bec Nicholson

Bush Gully Station

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Attachment 1 to Report 22.183

Submission #12 - Pip Wilkinson

Email
23 April 2022, 2.41pm

We fully support Dan.

We have had 180% inrease in our rural rates Haurangi Road.

We reside Hinakura. No possum control for more than 5 years and the numbers are out of control we have requested action we have had nothing.

Pip Wilkinson

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Submission #13 - Cherry Cutfield

Email
24 April 2022, 3.47pm

I am the owner of a remote hill country station and I strongly support the submissions of both Federated Farmers and Mr Dan Riddiford regarding the GW rating review. The current situation is absurd and intolerable.

Yours sincerely

Cherry Cutfield

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Attachment 1 to Report 22.183

Submission #14 – Dan Riddiford

Email
24 April 2022, 3.49pm

D T S Riddiford **BA LLB**

Export & Business Consultant

Te Awaiti Station,
Martinborough RD2
Tel [redacted]

Email: danriddiford@teawaitistation.co.nz

Mr D Ponting, GW Regional Council

The Chairperson and Councillors,

SUBMISSION ON GW RATING REVIEW **due 20 4 22**, extended to 24 4 22

1 PERSONAL BACKGROUND AND THANK YOU

I and my wife Diana live and farm at Te Awaiti Station 6552 ha steep hill country an hours drive on the Coast to the east of Martinborough. GW Soil mapping has calculated that over 80% of the property is greywacke soil type, equivalent in nature to the Rimutaka Road summit, so that only 1000+ ha can be effectively farmed. (See "A" GW Aerial Farm Plan. GW Dr Hicks Soil Map and Report stated for greywacke max 2500kg DM per ha).

Unproductive greywacke land should not be factored by QV in a desk top exercise of farm revaluation into the Government Valuation. In terms of s101 Local Government Act, unproductive greywacke land cannot generate economic activity and so require the raising of rates to fund the consequent spending of "benefits."

I thank the Council in their rating proposals for accepting in part my submission of 26 4 21 (attached below) so that the GW finance team calculated that we at Te Awaiti Station will receive an 86-6% reduction in GW rates resulting in a reduction in GW rates of **$14,445** pa, I would expect similar reductions in the rates paid by my neighbours.

I and my farming neighbours deplore the failure of all Councils to limit their expenditure.

2 HOWEVER THE LAW AS EXPRESSED AT S101 LOCAL GOVERNMENT ACT 2001 REMAINS UNCHANGED

I am disappointed that GW has not obtained an independent legal opinion on the law or shared its legal advice with any of the Farmer Ratepayers. For example GW has buried the legal advice from Mr Johnathan Salter of Simpson Grierson, a recognized expert in rating law. Instead the Greater Wellington appear to have relied on unsubstantiated assertions, such as from Ms Samantha Gains their in house Counsel to me, that benefits analysis did not apply to general rates.

I have undertaken some recent legal research including receiving (on 4 April) a Citation Search undertaken by Chapman Tripp. Among the materials was the latest entry from WestLaw stating :

In CP Group Ltd v Auckland Council [2020] NZHC 89 the High Court considered an application for judicial review of Council's decision to impose an Accommodation Provider Targeted Rate to help fund its CCO, Auckland Tourism, Events and Economic Development (ATEED). The Applicant asserted that the Council was in breach of ss 101(3)(a)(ii) & (v), for having failed to (a)
adequately consider the distribution of benefits between the community as a whole, any identifiable part of the community, and individuals; (b) properly inform itself of the extent to which ATEED's spending would benefit the accommodation sector and (c) properly consider the costs and benefits (including consequences for transparency and accountability) of funding the activity
Local Government - Key Legislation
Friday, 01 April, 2022 at 14:33 NZDT Page 2 distinctly from other activities. The High Court dismissed each of these claims on the evidence presented and concluded that the council's decision-making was not flawed in any of the alleged ways.
<u>This decision was overturned on appeal to the Court of Appeal in C P Group Ltd v Auckland Council [2021] NZCA 587</u>. In relation to
s 101(3)(a)(ii) the Court found at [114] that there needed to be:
"... a meaningful assessment, even if necessarily broad and imprecise, of that benefit to the targeted group in comparison with others." It found the benefit of the funded activity to the targeted group had not been adequately considered because an assumption that the cost would be borne by accommodation users was both flawed and an irrelevant consideration. The council's failure to consider this mandatory relevant consideration impeached the validity of the decision to make the rate, which was set aside.

Faced with the lawless approach by the Regional Council as well as the District Council in ignoring benefits analysis I have for the past three quarters not paid part of the rates for Te Awaiti Station to compel the Councils to meet their legal obligations and address the problem revealed in an OI Act response that we received no benefits. Moreover there is a real potential for unjustified increases on Remote Farmers from Three Waters and Carbon. On the basis of carbon our land values could more than quadruple increasing our rates past $220,00pa We are in danger of being rated off the land.

Last year my neighbours asked whether they should also withhold rates. I advised against non payment since at the time the townspeople of the South Wairarapa were objecting to increases in rates over 30% despite SWDC announcements that the rates increase would be limited to 12%-14%. I advised that our insurmountable argument of no benefits analysis should be clearly differentiated from the town argument of faulty consultation.

3 WE WERE PROMISED A FIRST PRINCIPLES RATING REVIEW

However GW have :

1 Prevented my neighbours and I from meeting the Chair…our democratic right

2 Instructed Mr Kyn Drake not to hold a meeting with South Wairarapa Farmers in Tuturumuri and elsewhere to analyse on a Farmer by Farmer basis actual benefits received

3 Have ignored the absence of benefit to remote rural farmers from the Public Transport Levy

4 Have failed to investigate UAGC's

5 Have perpetuated the myth that general rates are exempt from benefits analysis, being a mere tax

6 Ignored Official Information Requests essential to this submission

4 "RATEABLE EQUALITY" IS PART OF FIDUCIARY DUTY

The Court of Appeal (5 Judges) *Mackenzie District Council v Electricorp* [1992] 3 NZLR 41 held following English decisions that Councils owed a fiduciary decision to their ratepayers. The fiduciary duty originates in the law of equity and creates responsibilities similar to those of a Trustee towards their Beneficiaries. One of the principles is that beneficiaries should be treated rateably equal. The word "rateably" means according to their circumstances. Thus Remote Hill Country Farmers may be treated "equally" even if differently from town residents. *They do for themselves*

5 FURTHER WORK

I generally support the submission of Federated Farmers (1) and (2) :

3-1 Federated Farmers call on Councillors to direct staff to prepare – in advance of the hearings:

General Rate: analysis of the rating impacts of use of UAGC in lieu of the general rate at 30% (the maximum allowable) or 20% (the average across other Councils)

3-2 Public Transport: analysis of the rating impact of targeting this rate to urban ratepayers only, or alternatively a flat rural rate, ie, removal of the rural differential based on CV [Te Awaiti will continue to pa **$1284.74**]

And further request GW

3-3 State the % of total GW rates now occupied by Water Functions now Three Waters and

3-4 in future in years 2023/2024/2025/2026/2027

3-5 Confirm that since Remote Farmers construct and maintain their own Water Supplies and Water Effluent systems that should not have to contribute to the work of GW in these areas

3-6 State their strategies to prevent rates on remote farms increasing by reason of carbon sequestration lifting the market price of land. A first step would be to direct Quotable Value to value (1) Full market including carbon influences and (2) Livestock Market value without carbon or forestry influences.

3-7 State whether they will support programs by Remote Farmers to control their own pests by suppling pest control materials (a) free of charge or (b) at best wholesale cost. See “B” Carston retail cost of materials **$825 GST exc** ($450+$375)

3-8 State whether flood rates will be reduced whenever land is degraded by the artificial creation of floodways

DTS Riddiford 22 4 22

Attachment 1 to Report 22.183

SUBMISSION ON THE DRAFT GW LONGTERM PLAN 2021-2031 REVENUE AND FINANCE POLICY RMA CHARGES

26 4 21

1 PERSONAL BACKGROUND

I and my wife Diana live and farm at Te Awaiti Station 6552 ha steep hill country an hours drive on the Coast to the east of Martinborough. GW Soil mapping has calculated that over 80% of the property is greywacke soil type equivalent in nature to the Rimutaka Road summit so that only 1000+ ha can be effectively farmed. (See Attached Aerial Farm Plan. GW Soil Mapping and Dr Hicks Report).

Unproductive greywacke land should not be factored by QV in a desk top exercise of farm revaluation into the Government Valuation. In terms of s101 Local Government Act, unproductive greywacke land cannot generate economic activity and so require the raising of rates to fund the consequent spending of "benefits."

2 THE WORLD DEFLATIONARY DEPRESSION…. everyone must adjust

Deflationary depressions are cyclical in nature, since human nature alternates between optimistic expansion and anxious contraction. Governmental expenditure has unfairly shifted the burden of the World Deflation against remote farmers as exporters and price takers having to meet the market.

In April 2010 I submitted to the SWDC. Under the LG OfficiaL Information Act I had discovered that while Te Awaiti Station in 2019/2020 paid total rates of $36,653-39 (SWDC rates $21179-95 and GW rates $15473-44) making us the fourth highest ratepayer in the SWDC, the highest commercial ratepayer in Martinborough appeared to be the Pukemanu Pub at 10-12 Memorial Square Martinborough paying total rates of $20,859-21. Assessed in terms of benefits received this was absurd. Since then the gap has increased, but neither the SWDC or GW have acted to fix the injustice.

I also ventured some opinions on the World Deflation. I urged that one obvious feature was "go frugal, go rural" so that there would be an increased demand for houses in the South Wairarapa. However I under estimated the extent of the Government spend up.

The can has merely been kicked along the road. COVID 19 was merely the name for the trigger event, for which present World leaders lacked the personal capacity to govern. The perception and probable reality of climate change is likely to extend the deflationary period. Times of deflation are times of disruption and enforced social and technological change. Change can be good.

The present Government has mislead the Country by talking of COVID 19 rather than the World Deflation and the inevitable change. Huge public borrowing has been largely wasted to preserve old structures such as expensive housing and unreformed bureaucracies which must change. The spend up has artificially hardened the $NZ and trimmed 20% from the gross returns of beef and sheep prevailing two years ago. All of this at the same time that unsustainable expectations of wage increases are driving up **5** input costs from manufacturing to transport and now rates.

Hill Country Farmers are now in a price cost vice. This is masked however by the short term policy of sequestered carbon artificially increasing the price of land for 5Farmers wishing to sell up.

3 TOTAL GW AND SWDC RATES

2021 Total rates paid this year $47,780-82 inc

2022 Next year with 23% increase $58770-40 inc

2025 Three years at 23% compound $117540-80 inc

SWDC RATES DETAILS 2020
$28,596 GST inc (

GW RATES DETAILS 2020
$19184-44 GST inc (includes $1552-64 for public transport…..?
Includes $7512.95 pest rates…..but last year the Station killed 2000+ opossums
Includes$2327-70 Awhea Opouawe ……..no on farm benefits ever)

SWDC RATES PROPOSAL
19-4% rates increase (Wairarapa Times Age p1) 17-2% (Mr Harry Wilson SWDC)

GW RATES PROPOSAL $11,151-29 general rates by the Calculator
23% rates increase and the Wairarapa shall pay more (GW Councillor)

4 THE REVENUE PROBLEM BY REFERENCE TO BEEF AND LAMB FIGURES PREPARED BY MR ROB DAVISION HEAD ECONOMOC SEVICES

The attached graphs (2 and 3) shows that if we assume 8000su in sheep and cattle are farmed on 1000+ effective hectares at Te Awaiti at the same level of profitability as lower quintile hard hill country farmers on the Beef and Lamb tables, total GW and SWDC rates at 2020 levels now takes 6-4% of gross revenue. Next year's rates increases will take that figure to 7-6% of gross income. However if the rates burden increases at 23% annually compounding it will double in three years and require 15% of gross income…..likely all net income…..not available for reinvestment in the land. Drawings are a dream. These figures are standardized for a debt free farm.

For the past five years we have received no benefits from GW Regional Council. There has been no opossum control work and pest numbers are increasing. There is no acknowledgement that Station Staff and Contractors remove over 2000 oppossums per year at private expense. There has been no assistance with Soil Plans or Conservation Work. Absurdly we contribute $1552-67 towards public transport headed towards Wellington, which we cannot possibly use.

The Rates and Charges Increases will cause an economic multiplier in reverse as livestock Farmers pursue policies of managed retreat as we did in the 1980's. or more probably wholesale conversion of land to carbon radiata.

5 THE SOLUTION : BENEFITS ANALYSIS : THE LAW

John Locke Philosopher to Bill of Rights Act 1689 "Who benefits and who pays"

Attachment 1 to Report 22.183

Mackenzie District Council v. Electricorp [1992] 3. NZLR 41 Court of Appeal held that : (1) following English caselaw Councils owe a fiduciary duty (like trustee and beneficiary) to ratepayers (2) which requires inter alia a duty to treat all ratepayers rateably equal (rateably means according to circumstances) (3) which cannot be achieved unless a Council groups all ratepayers into categories according to receipt of benefits. That resulted following privatization of SOE's in category *Electricorp*, a sole legal entity in the Mackenzie District paying rates for the first time achieving a huge reduction in proposed rates since it did not read books or enjoy parks, but built its own roads.

These principles are reflected in s101 Local Government Act 2002 (underlining added)

S 101 Financial management

.(1) A local authority must manage its revenues, expenses, assets, liabilities, investments, and general financial dealings prudently and in a manner that promotes the current and future interests of the community.

(2) A local authority must make adequate and effective provision in its long-term plan and in its annual plan (where applicable) to meet the expenditure needs of the local authority identified in that long-term plan and annual plan.

(3) <u>The funding needs of the local authority</u> must be met from those sources that the local authority determines to be appropriate, <u>following consideration of</u>,—

(a) in relation to each activity to be funded,—

(i) the community outcomes to which the activity primarily contributes; and

(ii) the distribution of <u>benefits</u> between the community as a whole, <u>any identifiable part of the community, and individuals; and</u>

(iii) the period in or over which those benefits are expected to occur; and

(iv) the extent to which the actions or inaction <u>of particular individuals or a group contribute to the need to undertake the activity; and</u>

(v) the costs and benefits, including consequences for transparency and accountability, of funding the activity distinctly from other activities; and

(b) the overall impact of any allocation of liability for revenue needs on the community.

Relevant also is the legal proposition that a tax cannot be charged on a tax and that GST cannot be charged where a Farmer ratepayers is not under the GST Act receiving goods and services. Thus a Council arguing that general rates for vague public purposes and without benefit analysis would have to accept that GST could not be added.

The figures above show that Te Awaiti Station is already paying a legally absurd and unreasonable amount in general rates eg <u>more than six times any commercial ratepayer in</u> Martinborough. If there is not an immediate change rates increases at 23% would result in a doubling of rates so that all net income from sheep and cattle would be required to pay rates. That would result in a "substantial deprivation of our property right" the threshold set by the Supreme Court in *Waitakere District Council v Estate Homes* SC 73/2005 [2006] NZSC 112 at which either compensation should be paid or a law is unenforceable

6 THE SOLUTION

The ASB Bank advises that $10,000 in annual rates would be a normal figure to pay for a store hill country farm carrying 10,000 su

80% of Te Awaiti is greywacke country, which the Hicks report states could never theoretically produce more than 3000kg DM per ha. Such land is not potentially capable of delivering any cash "benefits". However QV with superficial methods of desk top valuation have assumed it to be productive land.

7 REFORM

It is unjust for the Rating Review to be deferred to the distant future. I submit that the Rating Review could be started immediately for conclusion within three months ie by 31 August 2021 with reform backdated to at least 1 April 2021 Alternatively immediate rates relief for Farmers could be achieved by introducing the Remote Rural Differential now to terminate within two years or earlier if the Rating Review had been sooner concluded and its changes implemented.

A Remote Rural Differential (possibly combined with greater use of UAGC's) is the only way for Remote Farmers to be treated "rateably equitably" (ie equally according to circumstances *Mackenzie District Council v Electricorp*) with commercial ratepayers in Martinborough or Wellington.

I request with immediate effect:

1. A Remote Rural Differential to reflect the fact that remote rural residential farmers and residents do not benefit from GW activities on the Wairarapa Plain. I submit that the edge of the remote rural differential should commence more than 20 minutes drive from Martinborough from where the residents will not casually drive to Martinborough every day to recreate or shop and so receive the full range of town benefits. By comparison a rural ratepayer living at the edge of Martinborough say in Shooting Butts Road can readily drive to Martinborough for a casual latte or to shop. The natural boundary should be the top of the Whakapuni boundary at the Windmills.
2. All GW Council services should be financed with specific levies and rates . Where there are no benefits received specific levies should cease eg GW Public Transport $1662-57 eg $7512-95 Pest Rates eg $2327-70 Awhea Opouawe
3. UAGC's Uniform Annual Charges targeted toward households can recognize that people living in households disproportionately demand Council services/benefits

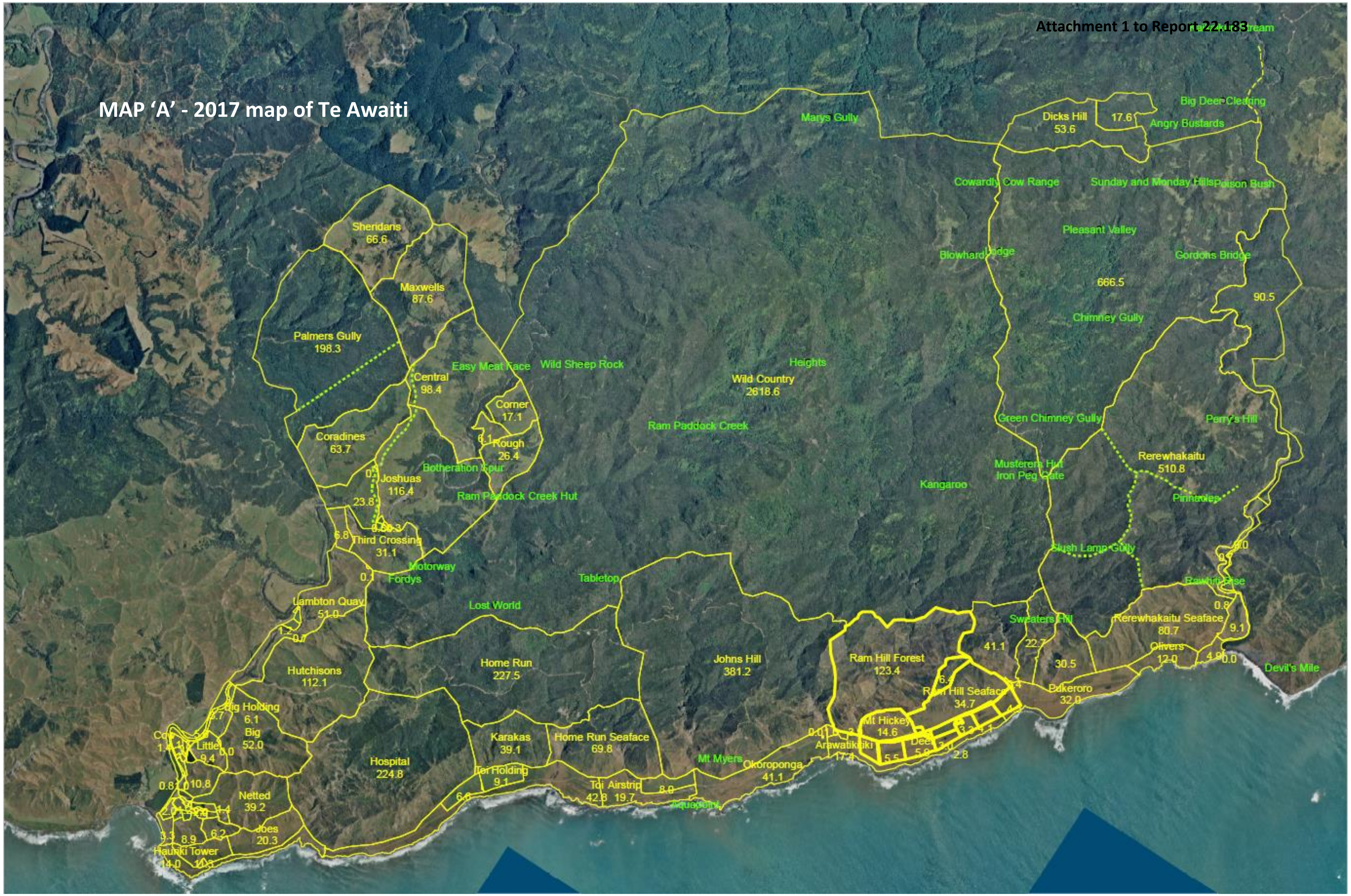
I have asked that reform for Farmers living remotely start immediately due to the extreme injustice and perverse incentive that excessive rates will force land into radiata trees for carbon. The Remote Rural Zone would take effect immediately but be subject to any future Rating Review.

I generally support the Submission of Federated Farmers prepared by Ms Elizabeth M'Gruddy and ask that there be no further increases for Resource Management Act or other specific charges.

I ask that the Federation Submission as well as submissions from myself and our neighbours be heard live in either Martinborough or Masterton

All future payments for rates, levies in terms of Rating Legislation or other charges should be treated as paid "under protest" and without prejudice to all future actions and be retained by GW specifically in trust as I (or fellow ratepayers) may direct.

DTS Riddiford 26 4 21


Attachment 1 to Report 22.183
MAP 'A' - 2017 map of Te Awaiti
Marys Gully
Dicks Hill
53.6
17.6
Big Deer Clearing
Angry Bustards
Cowardly Cow Range
Sunday and Monday Hills
Poison Bush
Pleasant Valley
Blowhard Ledge
Gordons Bridge
666.5
90.5
Chimney Gully
Sheridans
66.6
Maxwells
87.6
Palmers Gully
198.3
Easy Meat Face
Wild Sheep Rock
Heights
Central
98.4
Wild Country
2618.6
Corner
17.1
Ram Paddock Creek
Green Chimney Gully
Perry's Hill
Coradines
63.7
Rough
26.4
Rerewhakaitu
510.8
Botheration Spur
Musterers Hut
Iron Peg Gate
Joshuas
116.4
Kangaroo
Ram Paddock Creek Hut
Pinnacles
23.8
Third Crossing
31.1
6.8
Slush Lamp Gully
Motorway
Fordys
Tabletop
Lambton Quay
51.0
Lost World
Sweaters Hill
Rerewhakaitu Seaface
80.7
9.1
41.1
22.7
Olivers
12.0
Hutchisons
112.1
Home Run
227.5
Johns Hill
381.2
Ram Hill Forest
123.4
30.5
Devil's Mile
Pukeroro
32.0
Ram Hill Seaface
34.7
Big Holding
6.1
Big
52.0
Mt Hickey
14.6
Little
9.4
Karakas
39.1
Home Run Seaface
69.8
Arawatikitiki
17.4
Hospital
224.8
Mt Myers
Okoroponga
41.1
Toi Holding
9.1
Toi Airstrip
42.8
19.7
Aquapoint
10.8
Netted
39.2
Joes
20.3
8.9
Hauki Tower
14.0

Attachment 1 to Report 22.183

From: ben carston [redacted]
Sent: Wednesday, April 20, 2022 5:52:43 PM
To: Dan Riddiford <danriddiford@teawaitistation.co.nz>
Subject: Re: Possums

Evening Dan

Just looking at the bait station set up.

Station head- 14x bait stations

This includes tree line by station cottage and small pine block.

Hospital- 46x bait stations

This is mainly following tracks for ease of access.

Bait I'm recommending is double tap. This has a quicker knock down than brodifacoum and breaks down in dead animals faster.

Sentry bait stations from www.traps.co.nz

$7 EACH X 60= $450.00 excl get

Double Tap Pellet Bait 12g

https://www.connovation.co.nz/

3 x10kg buckets at $125.00 excl get each $375

Stations fit 200g so a 10kg bucket should do 50 stations. 3 buckets will be enough to do setup and two services.

Will do a map of my suggested lines around hospital tomorrow.

Thanks

Ben Carston

From: Dan Riddiford <danriddiford@teawaitistation.co.nz>
Sent: Wednesday, April 20, 2022 4:42:39 PM
To: ben carston [redacted] Wayne O'Donnell <Wayne.O'Donnell@gw.govt.nz>; Amanda Vickerman <amanda.vickerman@gw.govt.nz>; Dan Riddiford <danriddiford@teawaitistation.co.nz>
Subject: Possums

Attachment 1 to Report 22.183

Mr Ben Carston **027 359 2656** Wayne ODonnell 027 449 9989 20 4 22

Good Morning Ben,

The possum problem at Te Awaiti

1 Possum numbers at the Stationhead are so high that the Orange tree at our house at Te Awaiti has been killed and the Lemon tree has been savagely eaten despite being netted. All of Diana's native planting show signs of possum browsing A program of bait stations is required along all double fenced shelter belts and areas inaccessible to livestock Please be aware of the risk to Station dogs and the domestic cats of John Pitau and Diana. Rabbits browsing our vegetable garden is also a serious problem.

2 This Winter from 1 July we will plant 50,000+ eucalypt globoidea in Hospital Paddock under 1BT. I have been alarmed by reports from the Scion nursery in Rotorua that the globoidea seedlings in the Scion nursery have been heavily browsed by possums requiring them to place bait stations and other traps. I envisage a line of traps along the road through Hutchisons.......through Home Run .....right turn towards the sea behind Karakas and then down the fenceline between Karakas and Home Run Seaface

3 High numbers of possums in the Heights, an area of high biodiversity value.

The Solution

<u>Could you please for both areas (1) and (2) plan a configuration of bait stations and list all materials required and their retail cost by Friday 22 April at the latest.</u>

Could you please in the future advise on the problem of possums in the Heights.

GW Council

In the first instance I will pay for all materials. However I will copy this letter to Mr Wayne O'Donnell **027 449 9989** since as a matter of principle GW should have policies for Farmer Self Control of possums

Thankyou

Yours Sincerely

Dan

PS Mr Wayne O'Donnell

1 I would be grateful if you or Amanda could before Friday send to me all policies now in place for Farmers or other Landowners controlling their own possums

2 Before Friday could you please advise whether GW can supply possum control materials free of charge and or at cost price

3 [Mr Ben Carston is a former employee of Te Awaiti Station on Beekeeping and General Work. We have retained our friendship since then so he has an intimate knowledge of the Station's geography. He is now employed by GW in the Pest Control area.] While Ben has insisted that he does not wish to be in any way paid for his work, I suggest that GW and I could collaborate in using his knowledge to ensure the best results from our control work at Te Awaiti and as a model for what could be achieved elsewhere. Possibly this could be included in his regular duties..

4 What is the soonest time Oli Cudby Walker and Holly can be approved as Contractors by GW and what is the process ? [Local Catchment projects as promoted by 1BT will not succeed without local control of possums]

Regards Dan


Attachment 1 to Report 22.183
Map 'B' – Predator control trapline

NOTES:

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Attachment 1 to Report 22.183

Submission #15 - Christine Wilton

Email
24 April 2022, 5.12pm

On behalf of my two sons and myself, who have several parcels of land in this area I totally support the federated farmers and Dan Riddiford, in regard to the rate increases that we have faced.

yours sincerely

Christine Wilton

NOTES:

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Submission #16 – Steve Galyer

Email
30 March 2022, 1.52pm

What is your name?

Steve Galyer

Are you submitting on behalf of an organisation? (if yes, who?)

No Wainuiomata

What is your email? (We will need this if you wish to speak to your submission)

[redacted]

Where in the region do you live?

Lower Hutt

Are you a rate payer?

Yes

What kind of property do you own?

Rural
Residential

Do you want to speak to Council in support of your submission?

No

Do you support the "Regional Economic Development" proposed funding method?

Unsure

Any comment on the "Regional Economic Development" proposed funding method?

Be nice to be informed on proposals

Do you support the "Regional Predator Control Programme" proposed funding method?

Unsure

Any comment on the "Regional Predator Control Programme" proposed funding method?

Be nice to be informed on proposals

Do you support the "Land Management" proposed funding method?

Unsure

Any comment on the "Land Management" proposed funding method?

Be nice to be informed on proposals

Do you support the "Flood Protection - Te Kāuru floodplain Management Plan" proposed funding method?

Unsure

Any comment on the "Flood Protection - Te Kāuru floodplain Management Plan" proposed funding method?

Be nice to be informed on proposals

Do you support the "Flood protection - Waiōhine River Plan" proposed funding method?

Unsure

Any comment on the "Flood protection - Waiōhine River Plan" proposed funding method?

Be nice to be informed on proposals

Do you support "The Stadium" proposed funding method?

Unsure

Any comment on "The Stadium" proposed funding method?

Be nice to be informed on proposals

Do you support the "Public Transport" proposed policy changes?

Unsure

Any comment on the "Public Transport" proposed policy changes?

Be nice to be informed on proposals

Do you have any other comments you would like to make about the proposed changes to the Revenue and Financing Policy?

Not much point in this survey as I have never been made aware of their existence

2022 Funding and Financial Policies Hearing Committee
17 May 2022
Report 22.192

For Decision

ANALYSIS OF SUBMISSIONS TO THE RATES REMISSIONS ON MĀORI LAND POLICY

Te take mō te pūrongo
Purpose

1. To provide the 2022 Funding and Financial Policies Hearing Committee (the Committee) with submissions received during the Rates Remission on Māori Land Policy consultation, together with initial officer advice on key topics raised in the submissions.

He tūtohu
Recommendations

That the Committee:

1 **Considers** the submissions on the Rates Remissions on Māori Land Policy (Attachment 2).

2 **Recommends** to Council, following consideration of the submissions, proposed key responses and officer advice, any changes to the Rates Remissions on Māori Land Policy, as agreed to by this Committee.

Te horopaki
Context

2. The Local Government Act (2002) requires councils to have a policy on rates remissions and postponements on Māori freehold land.

3. Greater Wellington is reviewing the policy following changes to the Local Government Act 2002 and Local Government (Rating) Act 2002 that took effect in July 2021. The proposed changes to the policy will ensure it is up to date and compliant with the legislation for rating of whenua Māori and the principles of Te Ture Whenua Māori Act 1993.

4. Council has considered the option of retaining the existing policy and decided instead to consult on the proposed changes in the policy shown at **Attachment 1** as these better align with Council's strategic priority of improving outcomes for mana whenua and Māori, and with Council's adopted Māori Outcomes Framework.

5. On 17 March 2022, Council approved the Rates Remission on Māori Land Policy Consultation Document for public consultation.

6. The public consultation period ran from 21 March 2022 to 2 May 2022. A high-level overview of the approach to consultation, and results of the consultation, are covered later in this report.

Version issues during first week of consultation

7. An incorrect version of the proposed policy, in both English and te reo Māori, was on the Greater Wellington website for the first four days of the consultation period. This version predated the changes made to the policy as the result of the external legal review and while these differences were minor and administrative in nature, it did mean that submitters initially were responding to an incorrect version of the policy if they had downloaded the policy as part of making a submission.

8. Three of the eight submissions were received while the incorrect version of the policy was available. Each submitter was contacted with an apology and an explanation of what had occurred, given an overview of the differences in the policy versions, and asked whether they would like to make any changes to their submission as a result. Of those three submitters, one confirmed no changes were necessary, one did not respond, and one responded with additional comments in response to those specific differences but did not request any changes be made to their original submission.

Te tātaritanga
Analysis

Submissions received

9. A total of eight submissions were received by individuals, or on behalf of a group or organisation. 6 of those submissions were received online through “Have Your Say”, and two submissions were received by email. These submissions are included as **Attachment 2** of this report.

10. Submitters were asked to identify where in the region they resided, of the six who responded:

    a 16.7 percent reside in Wellington

    b 16.7 percent reside in Porirua

    c 16.7 percent reside in Upper Hutt

    d 33.3 percent reside in Wairarapa

    e 16.7 percent live outside the region, but own land in the region.

11. Submitters were asked to identify their ethnicity and whether or not they owned or represented Māori land. This question helps us understand whether submitters would actually be affected by the policy given its focus on Māori land, as well as the efficacy of our consultation in reaching Māori submitters who are often under-represented in Greater Wellington’s consultation campaigns.

12. Of the seven submitters who provided information on their ethnicity, four identified as Māori and are affiliated to mana whenua in the region, one identified as Māori (mātāwaka), and three identified as NZ European. Note that ethnicity results usually

add up beyond 100% of submitters as multiple ethnicities can be identified with and we do not limit the choices of submitters to identify with more than one ethnicity.

13. Of the four submitters who identified as mana whenua, submissions were received from people with connections to:

    a Rangitāne o te Wairarapa

    b Kahungunu ki Wairarapa

    c Ngāti Toa Rangatira

    d Ngāti Koata

    e Te Ati Awa

    f Ngāti Raukawa

    g Ātiawa ki Whakarongotai

    h Ngāi Tumapuhiarangi

14. Submitters were asked if they owned or represented Māori land, and what type of Māori land. Of the six who responded to this question, two owned or represented an organisation that owned Māori land. This included Māori land in general title, and Māori reservation land.

Summary of submissions and key themes raised during the consultation

15. During the consultation we asked the public six questions about the proposed changes to the policy. The level of support from the public on each question is as follows:

    a *Do you support the proposed inclusion of "Māori freehold land converted to general title under the Māori Affairs Amendment Act 1967" as eligible land under the policy?*

    - seven submitters clearly answered this question
    - six submitters (85.7%) indicated "Āe/Yes"
    - one submitter requested changes to the eligible land to include a wider range of Māori freehold land taken and then later returned to previous owners or their descendants not in general title.

    b *Do you support the proposed inclusion of "Treaty settlement land" as eligible land under the policy*

    - seven submitters clearly answered this question
    - six submitters (85.7%) indicated "Āe/Yes"

    c *Do you support the proposed inclusion of "Land in general title collectively owned by Māori" as eligible land under the policy?*

    - seven submitters clearly answered this question
    - six submitters (85.7%) indicated "Āe/Yes"
    - one submitter requested changes to the criteria, specifically criteria point 3 to include other types of whenua Māori, and to criteria point 6 to include hapū and whānau in addition to marae.

d *Do you support the proposed inclusion of "Māori land in general title under development" as eligible land under the policy?*

- seven submitters clearly answered this question
- six submitters (85.7%) indicated "Āe/Yes"

e *Do you support the "Extending the term of remission from one to three years"?*

- eight submitters clearly answered this question
- seven submitters (87.5%) indicated "Āe/Yes"
- one submitter requested that the condition allowing Greater Wellington to cancel or reduce the rates remission should be removed, provided the land owner is meeting the eligibility, criteria and conditions.
- one submitter commented on the need to have as long a term for the remission as possible, as it is often not easy to contact owners of Māori land. The submitter also noted the need to have alignment with other councils, and encouraged this alignment of other councils to the three year remission period proposed by Greater Wellington.

f *Do you support the* ***"Removal of rates postponements"*** *as an applicable tool under the policy?*

- seven submitters clearly answered this question
- six submitters (85.7%) indicated "Āe/Yes"

Other issues raised by submitters

16. Submitters were also encouraged to provide more commentary on their views. Five submitters provided further insight into the topics consulted on and others also shared their thoughts on other issues that were important to them.

17. A summary of key submission themes beyond the six specific questions around changes to the policy is outlined below.

Theme 1: Jointly owned Treaty settlement properties

18. One submitter raised Te Rohe o Rongokako Joint Redress Bill 2002 currently before Parliament, which will vest several properties in Rangitāne Tū Mai Rā and Ngāti Kahungunu ki Wairarapa Tāmaki nui-a-Rua settlement trusts.

Theme 2: Need for Greater Wellington to better understand Māori land issues and complications

19. Three submitters commented about the history of Māori land loss, return of Māori land and the issues facing Māori landowners who have managed to retain their land.

20. One submitter provided extensive detail on the history, use, ownership and challenges facing a range of Māori freehold and Māori reservation land in the Wairarapa.

Theme 3: Implementation issues

21. One submitter raised concerns that Māori landowners may not be aware of changes of their land status as a result of the Māori Affairs Amendment Act 1967, and subsequently not aware about their eligibility for a remission. The submitter encouraged Greater Wellington to promote the policy widely amongst to hapori and communities to ensure policy was accessed and utilised by landowners.

Theme 4: Alignment with other councils in the region

22. One submitter encouraged alignment on rate relief across rates policies for the Wairarapa, and specifically queried how the Greater Wellington's policy compares to the policy for Masterton District Council.

23. One submitter noted the benefit to whānau of having both Greater Wellington and Porirua City Council policies offering rates remissions that extend beyond Māori freehold land only.

Theme 5: Support for Māori landowners/whānau

24. One submitter noted the importance of rates remission from both regional and territorial authorities as a way of supporting whānau development, connection of whānau to their whenua, and a way to for whānau to generate income and self sufficiency from their whenua in the longer term.

25. One submitter agreed with the overall intention to provide support for landowners to achieve their aspirations for their whenua, and the importance of safety nets for Māori landowners to prevent potential loss of whenua.

26. One submitter noted this is a step away from the historical negative impacts of central/local government on Māori land ownership, and an opportunity to ease the that historical burden for Māori landowners.

27. One submitter noted the importance of the policy in supporting redevelopment of an economic base for iwi post-settlement, particularly given the limitations of land and resources that can be returned to iwi via settlements.

Theme 6: Unfair advantage to one group

28. One submitter commented that they thought the policy was racist in giving special rights to a certain ethnicity over another, and queried how this was fair.

Officer recommendations following consultation

29. The Committee will be provided with officer recommendations at the meeting on 17 May 2022 in response to submissions received and submitters heard during the consultation process (**Attachment 3** – to be tabled at the meeting).

Ngā hua ahumoni
Financial implications

30. Any decisions made in relation to the submissions received on the Rates Remissions on Māori Land Policy has the potential to change financial implications advised to Council at their meeting on 17 March 2022 (see Rates Remission on Māori Land Policy Approval of Policy for Consultation - Report 22.94). The full extent of the financial impacts will be determined following the 2022 Funding and Financial Policies Hearing Committee deliberations and will be reported to Council at the 16 June 2022 Council meeting.

31. Issues raised in submissions are not expected to change the costs associated with this policy but instead will clarify eligibility of those who may be eligible to receive a remission.

Ngā Take e hāngai ana te iwi Māori
Implications for Māori

32. Land is a taonga for Māori, and a fundamental connection to Pāpātuanuku and whakapapa. The connection to land is intrinsic to identity, wellbeing, sustenance and a sense of home and place. The loss of ancestral lands is a key issue for Māori and the retention of the land which remains, and return to ownership of land that was lost, is key consideration driving this policy review.

33. This policy will provide rates relief options to Māori landowners to support the ongoing holding of ancestral lands, support for marae and papakainga, protection of wāhi tapu and indigenous biodiversity, and to support the utilisation by Māori of their land in a way that meets their aspirations and aligns with the values and tikanga by which the land is held.

34. Any changed implications for Māori arising from recommendations in response to submissions will be specifically raised as part of staff analysis provided alongside the recommendations to the Committee

Ngā tikanga whakatau
Decision-making process

35. The matters requiring decision in this report were considered by officers against the decision-making requirements of Part 6 of the Local Government Act 2002.

Te hiranga
Significance

36. Officers considered the significance (as defined by Part 6 of the Local Government Act 2002) of these matters, taking into account Council's *Significance and Engagement Policy* and Greater Wellington's *Decision-making Guidelines*. Officers recommend that this matter is of low significance, as the financial implications are very limited and there is very limited impact on residents and ratepayers of the region, and no impact on Greater Wellington's services.

37. The policy does however hold significance for Māori given and consultation has been undertaken with a specific focus on engaging with mana whenua and other Māori landowners.

Te whakatūtakitaki
Engagement

Mana whenua and Māori engagement

38. An email was sent to Greater Wellington's mana whenua partners, and representatives of post settlement governance entities in the region, at the beginning of the consultation period and as a reminder at the beginning of the final week of consultation. An email was also sent to a range of Māori organisations Greater Wellington has working relationships with to raise awareness of the policy amongst Māori landowners.

39. A press release targeted at Māori media was issued, which led to an interview with Council Chair Daran Ponter on one local iwi radio station.

Public engagement

40. Greater Wellington undertook a small online marketing campaign for our public consultation, focused in first and last weeks of consultation. The online post reached nearly 6,000 people, yielded 115 engagements, 14 reactions and four shares.

41. Public engagement activities during the consultation included six online drop-in sessions. Two members of the public attended these sessions and then went on to make submissions.

42. Our *Have Your Say* platform had 147 total visits, with the consultation document being downloaded nine times and the policy document being downloaded four times.

Ngā tūāoma e whai ake nei
Next steps

43. The 2022 Funding and Financial Policies Hearing Committee will:

    a deliberate on the submissions received and heard, and agree on the recommendations for any changes to the draft Rates Remissions on Māori Land Policy on 17 May 2022; and

    b provide a report to Council on 16 June 2022 with their recommendations to Council for approval.

44. The final Rates Remissions on Māori Land Policy will be prepared by officers and recommended for adoption by Council at its meeting on 30 June 2022.

45. The updated Rates Remissions on Māori Land Policy will then take effect on 1 July 2022.

Ngā āpitihanga
Attachments

Number	Title
1	Proposed Rates Remissions on Māori Land Policy
2	Submissions received on Rates Remissions on Māori Land Policy
3	Submission responses from officers (to be tabled at meeting)

Ngā kaiwaitohu
Signatories

Writers	Laura Burkett – Kairuruku/Project Coordinator Scott Summerfield – Kaiwhakahaere Kaupapa/Project Manager
Approvers	Monica Fraser – Te Pou Whakaerae/General Manager, Māori Sue McLean - Kaiwhakahaere Matua Ratonga Rangapū/General Manager, Corporate Services

He whakarāpopoto i ngā huritaonga **Summary of considerations**
Fit with Council's roles or with Committee's terms of reference The Local Government Act 2002 requires Council to review its policy on the remission and postponement of rates on Māori freehold land at least once every six years. Providing submitters with the opportunity to speak to their submissions is required before a final Policy can be approved. This report provides the analysis of the public submissions to support the information the 2022 Funding and Financial Policies Hearing Committee will hear through the hearings.
Contribution to Annual Plan / Long Term Plan / Other key strategies and policies The Rates Remissions on Māori Land Policy sets out which properties may be eligible for a remission. This is a financial policy that informs (albeit with very low financial implications) the funding of Greater Wellington's activities and services.
Internal consultation The Finance department was consulted in the preparation of this report.
***Risks and impacts - legal / health and safety etc*.** There are no identified risks relating to the content or recommendations of this report.

Attachment 1 to Report 22.192

Remission of rates on Māori land

Greater Wellington must[1] adopt a policy on the remission and postponement of rates on Māori freehold land[2]. Greater Wellington has also elected to consider applications for remission of rates on certain land in Māori ownership which is not Māori freehold land.

Greater Wellington has taken into account the principles of the preamble to Te Ture Whenua Māori Act 1993 and the matters identified in schedule 11 of the Local Government Act 2002 in making this policy, including deciding to consider applications for remission of rates on general land collectively owned by Māori in the circumstances set out in this policy. This policy is made under sections 102, 108 and 109 of the Local Government Act which reflects that the policy applies both to Māori freehold land and to general land collectively owned by Māori.

Greater Wellington has determined that this policy does not offer postponement of rates.

Objectives

1. To recognise that certain Māori owned land may have particular conditions, features, ownership structures, or other circumstances that make it appropriate to provide relief from rates.
2. To recognise that Greater Wellington and the community benefit through the efficient collection of rates that are properly payable and the removal of rating debt that is considered non-collectable.
3. To support the connection of mana whenua and Māori to their traditional lands and resources, and cultural values, where appropriate, through the short, medium and long term relief from rates.
4. To meet the requirements of the Local Government Act 2002 and to support the principles in the preamble to Te Ture Whenua Māori Act 1993.

Eligibility, criteria and conditions

Greater Wellington will consider each application on its merit and a remission may be granted where it is considered that the application meets the relevant criteria and conditions set out below.

In order to be granted a remission the land much be eligible. Eligible land is either:

1. Māori freehold land or land which was converted from Māori freehold land to general title by status order change pursuant to the Māori Affairs Amendment Act 1967; or
2. General land in collective Māori ownership.

Land converted from Māori freehold title to general title under the Māori Affairs Amendment Act 1967 must be in ownership of descendants of the original owners at the time of the status order change.

1 Section 102 Local Government Act 2002.

2 Local Government (Rating) Act 2002 defines Māori freehold land as meaning land whose beneficial ownership has been determined by the Māori Land Court by freehold order.

Land in collective Māori ownership is land owned by Māori which:

1. was transferred to a Post-Settlement Governance Entity from the Crown as the result of a Treaty settlement, where no rates had been due to Greater Wellington prior to the transfer and the land is not currently generating a commercial return, and will not generate a commercial return in the financial year the remission is applied for; or
2. is held for:
   a. The protection of wāhi tapu or other cultural values intrinsic to the land; or
   b. Providing economic, cultural or infrastructure support for marae (including papakainga housing); or
   c. Educational, cultural or community purposes; or
3. satisfies the benefits requirements for land under development in section 114A of the Local Government (Rating Act) 2002.

And is owned by:

a. One of Greater Wellington's six mana whenua partner organisations
b. A Post-Settlement Governance Entity whose settlement is affiliated with the Wellington region
c. An entity representing hapū, whānau or mātāwaka interests in the region
d. A marae trust or other charitable organisation/incorporated society associated with marae.

Criteria

Greater Wellington will give a remission of up to 100 percent of all rates due for eligible land for the years for which it is granted based on the extent to which the remission of rates will meet at least one of the following criteria:

1. Support the use of the land by owners for traditional purposes
2. Support the relationship of Māori and their culture and traditions with their ancestral lands
3. Avoid further alienation of Māori freehold land
4. Facilitate any wish of the owners to develop the land for economic use
5. Recognise and take account of the presence of wāhi tapu that may affect the use of the land for other purposes
6. Recognise and take account of the importance of the land in providing economic and infrastructure support for marae and associated papakāinga housing (whether on the land or elsewhere)
7. Recognise and take account of the importance of the land for community goals relating to:
   a. The preservation of the natural character of the coastal environment
   b. The protection of outstanding natural features
   c. The protection of significant indigenous vegetation and significant habitats of indigenous fauna
8. Recognise the level of community services provided to the land and its occupiers
9. Recognise matters related to the physical accessibility of the land

Conditions

1. Applications for remission under this policy must be made in writing and should be made prior to the commencement of the rating year. Applications made after the commencement of the rating year may be accepted at the discretion of Greater Wellington. No remissions are able to be granted for a previous financial year.
2. Remissions will be granted for a period of three years, unless stated otherwise. Greater Wellington may reduce the period of remission during the period of the remission if it deems that the criteria for granting the remission are no longer met.
3. Applications should include the following information:
   a. Details of the rating unit or units involved
   b. Documentation that shows that the land is eligible as detailed above
   c. Supporting information to demonstrate that the remission will help achieve the criteria set out in the above section.
4. Greater Wellington may of its own volition investigate and grant remission of all or part of the rates (including penalties for unpaid rates) on any Māori freehold land in the region. This will only be undertaken for remissions on eligible Māori freehold land and not for any other Eligible land under this policy.
5. Relief, and the extent thereof, is at the sole discretion of Greater Wellington and may be cancelled and reduced at any time. Greater Wellington will advise landowners of the intention to cancel or reduce the remission or extent of remission, seek feedback from the landowner and take this feedback into account before making a final decision.
6. Where applicable, Greater Wellington may determine that a remission will only apply to part of the land to which is eligible (for example, wāhi tapu on a portion of a site that limits some but not the entire use of the site). In these cases the remission will be pro-rated.
7. For remissions on Māori land under development that meet the benefits described in section 114A(3) of the Local Government (Rating) Act 2002, Greater Wellington will determine the duration and extent of the rates to be remitted in accordance with section 114A(4) and section 114A(5) of the Act.
8. The applicant may choose to remit the payment of a lesser amount of rates than the full amount owing.

Decisions

Decisions on the remission of rates (including penalties for unpaid rates) under this policy, and decisions on remissions under section 114A of the Local Government (Rating) Act 2002, are delegated to Greater Wellington officers. All delegations are recorded in the delegations manual.

Attachment 2 to Report 22.192

2022 Te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori

2022 Rates Remission on Māori Land Policy

Submissions Received

Public Consultation 21 March – 2 May 2022

Contents

Attachment 2 to Report 22.192

Submission #1 – Danielle Barrett

Have Your Say
Monday, 21 March 2022 4:50 pm

Ingoa

Name

Danielle Barrett

E tautoko ana koe kia uru atu "Ngā Whenua Māori Herekore i whakawhiti ki te taitara whānui i raro i te Ture Māori Affairs Amendment 1967" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Māori freehold land converted to general title under the Māori Affairs Amendment Act 1967" as eligible land under the policy?

Āe | Yes

E tautoko ana koe kia uru atu "Ngā Whenua Māori nō te Māori e mau nei i te taitara whānui" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Land in general title collectively owned by Māori" as eligible land under the policy?

Āe | Yes

E tautoko ana koe kia uru atu "Ngā whenua whakataunga Tiriti" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Treaty settlement land" as eligible land under the policy?

Āe | Yes

E tautoko ana koe kia uru atu "Ngā whenua Māori taitara whānui e whakatupuria ana" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Māori land in general title under development" as eligible land under the policy

Āe | Yes

E tautoko ana koe kia "Whakarahi ake i te wā whakaitinga mai i te kotahi tau ki te toru tau"?

Do you support the "Extending the term of remission from one to three years"?

Āe | Yes

E tautoko ana koe kia "Whakakore i te whakatārewa rēti" hei wāhanga tono i raro i tēnei kaupapa here?

Do you support the "Removal of rates postponements" as an applicable tool under the policy?

Āe | Yes

Attachment 2 to Report 22.192

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Attachment 2 to Report 22.192

Submission #2 - Shawn

Have Your Say
Monday, 21 March 2022 5:37 pm

Ingoa

Name

Shawn

E tautoko ana koe kia uru atu "Ngā Whenua Māori Herekore i whakawhiti ki te taitara whānui i raro i te Ture Māori Affairs Amendment 1967" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Māori freehold land converted to general title under the Māori Affairs Amendment Act 1967" as eligible land under the policy?

Kao | No

He kupu āu:

Please comment:

How is this fair

E tautoko ana koe kia uru atu "Ngā Whenua Māori nō te Māori e mau nei i te taitara whānui" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Land in general title collectively owned by Māori" as eligible land under the policy?

Kao | No

E tautoko ana koe kia uru atu "Ngā whenua whakataunga Tiriti" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Treaty settlement land" as eligible land under the policy?

Kao | No

E tautoko ana koe kia uru atu "Ngā whenua Māori taitara whānui e whakatupuria ana" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Māori land in general title under development" as eligible land under the policy

Kao | No

He kupu āu:

Please comment:

This is actually racist giving special rights to a certain ethnicity over the other.

E tautoko ana koe kia "Whakarahi ake i te wā whakaitinga mai i te kotahi tau ki te toru tau"?

Do you support the "Extending the term of remission from one to three years"?

Kao | No

E tautoko ana koe kia "Whakakore i te whakatārewa rēti" hei wāhanga tono i raro i tēnei kaupapa here?

Do you support the "Removal of rates postponements" as an applicable tool under the policy?

Kao | No

He kupu āu:

Please comment:

This is actually racist giving special rights to a certain ethnicity over the other

Attachment 2 to Report 22.192

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Attachment 2 to Report 22.192

Submission #3 – Bob Hill

Email

23 March 2022, 12.30pm and 24 April 2022, 2.10pm

Ingoa

Name

Bob Hill

E tautoko ana koe kia uru atu "Ngā Whenua Māori Herekore i whakawhiti ki te taitara whānui i raro i te Ture Māori Affairs Amendment 1967" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Māori freehold land converted to general title under the Māori Affairs Amendment Act 1967" as eligible land under the policy?

He kupu āu:

Please comment:

There is the potential for Maori Land to be taken over by an agency even under the Act, and as a result we effectively loose our connect to out tupuna. There are burial sires across the lands of Tumapuhiarangi.

E tautoko ana koe kia uru atu "Ngā Whenua Māori nō te Māori e mau nei i te taitara whānui" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Land in general title collectively owned by Māori" as eligible land under the policy?

He kupu āu:

Please comment:

Pukaroro Trust No1 & No2 are Ahu Whenua – entities in their own rights.

E tautoko ana koe kia uru atu "Ngā whenua whakataunga Tiriti" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Treaty settlement land" as eligible land under the policy?

He kupu āu:

Please comment:

Many blocks are classified as Maori Reservations for example Te Unu Unu 2F2B and Te Maipi 7C7A. Those are coastal blocks managed by whanau elected either by the Maori Land Court or elected by owners

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E tautoko ana koe kia uru atu "Ngā whenua Māori taitara whānui e whakatupuria ana" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Māori land in general title under development" as eligible land under the policy

He kupu āu:

Please comment:

This is a conversation to be picked up by the Post Settlement Government Entity for Wairarapa Kahungunu Tamakinui a rua Rangitane have an interest in this as they have people on the land blocks

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E tautoko ana koe kia "Whakarahi ake i te wā whakaitinga mai i te kotahi tau ki te toru tau"?

Do you support the "Extending the term of remission from one to three years"?

Āe | Yes

He kupu āu:

Please comment:

Yes there is a need to have the longest length of time for rates remission. Getting feedback from owners is not easy as often owners may not live in the Wairarapa

** additional content from email 24 April 2022**

Administration changes Rates remission will only need to apply every three years Will this bring an alignment across the three authorities and Maori are able to see consistency and intervention policy to future alienation? MDC policy is reviewable each year. At the end of the day there needs to be a safety net (rates remission) for those Maori owners who need rates relief. That should be aligned to a three year review. This is particularly important where in the past a local farmer may have leased the land block, earned a return and paid for the rates. However if the land is land-locked Maori owners may be not be able to secure any financial in order to service rates and other rural services provided by the local authority.

E tautoko ana koe kia "Whakakore i te whakatārewa rēti" hei wāhanga tono i raro i tēnei kaupapa here?

Do you support the "Removal of rates postponements" as an applicable tool under the policy?

He kupu āu:

Please comment:

The Maori Land Court in 2017 set aside Te Maipi 7c7a and Te UnuUnu 2F2B as Maori Reserves. The Te UnuUnu Block (?) owed rates to Carterton District Council *

Attachment 2 to Report 22.192

He kupu anō āu e pā ana ki ngā tūtohi panonitanga ki te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori?

Do you have any other comments you would like to make about the proposed changes to the Rates Remissions on Māori Land Policy?

Te Unu Unu was discussed with the Maori Land Court Judge and it was agreed the block be regazetted to Maori Reservation. Te Maipi is land locked and again not too much can be done with – the judge set this aside as a Maori Reservation The Policy does not discuss Maori Land blocks which are land locked or have other covenants or government arrangements affected by Government Acts, local policies or agreement (?) forced by settler/govt arrangements late 1890's

below content was received by email 23 March

Wairarapa Maori land is made up of a range of small to medium land blocks owned by Maori. These will be hapu linked and as a result will have a range of owners but sitting within a particular hapu rohe or area. As you will know hapu karanga o Wairarapa will have a view on these including the land block trust which manages the land block. These challenges also impact on the PSGE (Ngati Kahungunu Wairarapa Tamakinui a rua.

The Pahaoa blocks on the coastal strip at the Pahaoa River and Waikekeno at Glenburn Station, Ngai Tumapuhiarangi might say it has a significant interest in these blocks but Ngati Hinewaka might say its they who have that interest.

In fact if you have a look at the coastal block Pukaroro No 1 and 2, both hapu have members on both blocks although Haami Te Whaiti has give significant service and fight to manage the blocks in the face of opposition from the land owner and in fact the land owner has been sanctioned by the Maori Land Court (see Maori Land on line Pukaroro No1).

This not an easy issue to comment on as there are so many interested parties such as Makirikiri, Akura, Taratahi, Te Oreore.

I can comment on the Te Maipi block as it has Ngai Tumapuhiarangi, Rangitane and Hinewaka members. This block has recently as 2017 been set aside (Gazette notice) as a Maori Reserve (as too Te Unuunu 2F2B) where it pays no rates. Te Maipi and Te Unuunu, Pukaroro and others are effectively land locked where access is difficult as is in the case of Pukaroro, or opportunities to create an income is difficult if there is only 20ha of land. And with 300 members or owners.

There are significant challenges for small Maori land blocks in the Wairarapa.

below content was received by email 24 April

I have now with a little more time read the later version of Te Kaupapa Here Whakaitinga Reti mo nga Whenua Maori. I have taken little bits from the policy and commented. Also looked at the Rates policies for the three local authorities in the Wairarapa.

I am generally comfortable with the consultation policy document promoted by Greater Wellington. A few things do pop up for me.

Policy documents should not be fixed but overtime there should be opportunity for amendments. will give effect to specific cultural redress shared between Ngati Kahungunu and Rangitane and provided for in the respective deeds of settlement. This should over time be reflected in the Greater Wellington policy document. Over time you may have to work with each hapu karanga in the Wairarapa on matters relating to their various land blocks. The challenge will be that each land block may see themselves as individual entities, independent of the PSGE (Rangitane and Kahungunu settlement trusts).

Page 1 "Policy"

I note that on this page in general the focus of this proposal is support owners to look after the whenua (whenua Maori) for current and future generations. In my earlier submission I commented on:

- Land locked blocks and in particular land belonging to Ngai Tumapuhiarangi on the coastal strip.

- or in the earlier period, post Castle Point block sale and subsequent forced land sales and individualisation of land blocks where land was 'given by the then Native Land Courts' to some individuals where other relative or interested parties were side-lined.

- A good account of alienation was articulated in the Waitangi Tribunal and CFRT by Tony Walzl and others for the hearings relating to Wairarapa ki Tararua (WA.I 863) to the inevitable plight of a Māori population left virtually landless in a part of the country where agricultural enterprise was the principal route to a good livelihood'. The level of land division, individualisation and alienation was horrendous - reinforced in the Waitangi Tribunal Report Wairarapa ki Tararua 2010 where 'Crown purchased too much Māori land too quickly and without regard

Based on this I agree with the statement (page1) to offer wider support to owners of whenua Maori to look after the whenua for current and future generations. (and prevent further unnecessary alienation)

Page 2

"Greater Wellington is proposing to consider applications for remission on whenua Maori that is not in Maori Freehold title and this section steps out potential criteria" I have looked at both the Masterton District Council and Carterton District Council policy documents on rates remission. Rates Remission and Postponement on Māori Freehold Land Policy.

MDC recognises:

- that certain Māori-owned land may have particular conditions, features, ownership structures, or other circumstances that make it appropriate to provide for relief from rates; and

- that MDC and the community benefit through the efficient collection of rates that are properly payable and the removal of rating debt that is considered non-collectable.

Is this different to what the regional council is proposing? The key focus in the MDC policy is the importance of efficient rates collection, from an economics point of view. I agree with this but I do not see any relief for Maori Land ownership if there are issues or difficulties relating to servicing payment of rates. I would support a common alignment on rate relief across rates policies for the Wairarapa.

Page 3

"We encourage Maori freehold landowners to check with their local council whether their land is rateable or non-rateable following changes to the legislation." My concern - this requires consistency to some level across the three authorities in the Wairarapa and an alignment with Greater Wellington.

Returning to your key points in the earlier email: The differences in the policy available online when you made your submission and the version that was approved by Council for consultation can be summarised as:

1) Clarifying the sections of the Local Government Act 2002 that the Policy is made under

   I wonder also is there any sections with in the Ture Whenua Act 1993 to consider?

2) Clarifying that at least one of the criteria must be met in order to be eligible for a remission

   Yes I agree, if there is genuine reason and one criteria clearly meets the thresh hold. Then eligibility must be considered.

3) Removing the criteria point "Provide for an efficient collection of rates and the removal of rating debt", as this is covered as an objective of the policy rather than part of the criteria

   I tended to cringe on this entry – remove.

4) Clarifying that Council will seek the views of landowners before cancelling a remission, and take those views into account when making a final decision on cancelling a remission

   This is always difficult as there will be sentimental and financial issues to deal with – but clear information to the chair of the block, hapu or their runanga or umbrella organisation.

5) 5) Clarifying that remissions for Māori land under development will be considered under the criteria and conditions set out in section 114A of the Local Government (Rating) Act 2002 Maori Land in Wairarapa –

Overall comment

In general Maori land in the Wairarapa is made up of a range of small blocks, many land locked and access for some is subject to farm or forestry owner agreement. There are so many small blocks in the Wairarapa its difficult to unpack how many are freehold, how many are Maori Reservation or some other legal entity imposed through the Maori Land Court or other legal mechanism. Overtime this might be a process that is to understand the various ownership of Maori land blocks and what that means for Greater Wellington for future consideration.

Just a note - an owner of a block of freehold Maori land can alienate (sell or otherwise dispose of the title of) that land. Whilst it is not as simple as selling general land, it can be done. Before a sale can proceed, it is necessary to obtain a certificate of confirmation from the Maori Land Court. It is still important to try and protect potential sales forced through rates default.

The recent Te Rohe o Rongokako Joint Redress Bill 2022 'will give effect to specific cultural redress shared between Ngati Kahungunu and Rangitane and provided for in the respective deeds of settlement'. This is another safety net for Maori Land Blocks in the Wairarapa along with the remissions policy

Attachment 2 to Report 22.192

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Attachment 2 to Report 22.192

Submission #4 – Joanne Waitoa

Have Your Say
Wednesday, 20 April 2022 8:06 pm

Ingoa

Name

Joanne Waitoa

E tautoko ana koe kia uru atu "Ngā Whenua Māori Herekore i whakawhiti ki te taitara whānui i raro i te Ture Māori Affairs Amendment 1967" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Māori freehold land converted to general title under the Māori Affairs Amendment Act 1967" as eligible land under the policy?

Āe | Yes

He kupu āu:

Please comment:

We have a long history of negative impacts of central/local government policy on Maori land. This is an opportunity to take a step in the other direction to ease the burden for Maori land owners.

E tautoko ana koe kia uru atu "Ngā Whenua Māori nō te Māori e mau nei i te taitara whānui" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Land in general title collectively owned by Māori" as eligible land under the policy?

Āe | Yes

E tautoko ana koe kia uru atu "Ngā whenua whakataunga Tiriti" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Treaty settlement land" as eligible land under the policy?

Āe | Yes

He kupu āu:

Please comment:

With treaty settlements, Maori get approximately 2% of what was lost and often important lands cant be returned as they're in private hands. Including treaty settlement land makes some effort further support the restoration of an iwi economic base.

E tautoko ana koe kia uru atu “Ngā whenua Māori taitara whānui e whakatupuria ana” hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of “Māori land in general title under development” as eligible land under the policy

Āe | Yes

He kupu āu:

Please comment:

Land status shouldn't limit Maori from having rates remissions. Particularly when it is to enhance whanau Maori through papakainga, land development.

E tautoko ana koe kia “Whakarahi ake i te wā whakaitinga mai i te kotahi tau ki te toru tau”?

Do you support the “Extending the term of remission from one to three years”?

Āe | Yes

He kupu āu:

Please comment:

Takes the burden of whanau to have to reapply.

E tautoko ana koe kia “Whakakore i te whakatārewa rēti” hei wāhanga tono i raro i tēnei kaupapa here?

Do you support the “Removal of rates postponements” as an applicable tool under the policy?

Āe | Yes

Attachment 2 to Report 22.192

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Attachment 2 to Report 22.192

Submission #5 – Mihirangi Hollings

Have Your Say
Thursday, 28 April 2022 6:59 am

Ingoa

Name

Mihirangi Hollings

Imēra

Email

[redacted]

Waea

Phone

[redacted]

E noho ana koe ki hea?

Where do you live?

Masterton District

Nō hea koe?

What is your ethnicity?

Māori (mana whenua)

Mehemea i kīia, he Māori (mana whenua), ko wai rā ō iwi?

If you selected Māori (mana whenua), what are your iwi affiliations?

Rangitāne o te Wairarapa, Kahungunu ki Wairarapa

He kaiwhaipānga koe o te whenua Māori herekore, he kaitiaki tōpū rānei e whaipānga ana ki te whenua mō te Māori te take?

Attachment 2 to Report 22.192

Are you an owner of Māori freehold land, or acting on behalf of an organisation that collectively owns land for the benefit of Māori?

Kao | No

E pīrangi ana koe ki te kōrero mai ki tō tono?| Do you want to speak in support of your submission?

Āe | Yes

E tautoko ana koe kia uru atu "Ngā Whenua Māori Herekore i whakawhiti ki te taitara whānui i raro i te Ture Māori Affairs Amendment 1967" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Māori freehold land converted to general title under the Māori Affairs Amendment Act 1967" as eligible land under the policy?

Āe | Yes

E tautoko ana koe kia uru atu "Ngā Whenua Māori nō te Māori e mau nei i te taitara whānui" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Land in general title collectively owned by Māori" as eligible land under the policy?

Āe | Yes

E tautoko ana koe kia uru atu "Ngā whenua whakataunga Tiriti" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Treaty settlement land" as eligible land under the policy?

Āe | Yes

E tautoko ana koe kia uru atu "Ngā whenua Māori taitara whānui e whakatupuria ana" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Māori land in general title under development" as eligible land under the policy

Āe | Yes

E tautoko ana koe kia "Whakarahi ake i te wā whakaitinga mai i te kotahi tau ki te toru tau"?

Do you support the "Extending the term of remission from one to three years"?

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Āe | Yes

E tautoko ana koe kia "Whakakore i te whakatārewa rēti" hei wāhanga tono i raro i tēnei kaupapa here?

Do you support the "Removal of rates postponements" as an applicable tool under the policy?

Āe | Yes

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Attachment 2 to Report 22.192

Submission #6 - Leana

Have Your Say
29 April 2022, 10:52am

Ingoa

Name

Leana

E tautoko ana koe kia uru atu "Ngā Whenua Māori Herekore i whakawhiti ki te taitara whānui i raro i te Ture Māori Affairs Amendment 1967" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Māori freehold land converted to general title under the Māori Affairs Amendment Act 1967" as eligible land under the policy?

Āe | Yes

E tautoko ana koe kia uru atu "Ngā Whenua Māori nō te Māori e mau nei i te taitara whānui" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Land in general title collectively owned by Māori" as eligible land under the policy?

Āe | Yes

E tautoko ana koe kia uru atu "Ngā whenua whakataunga Tiriti" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Treaty settlement land" as eligible land under the policy?

Āe | Yes

E tautoko ana koe kia uru atu "Ngā whenua Māori taitara whānui e whakatupuria ana" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Māori land in general title under development" as eligible land under the policy

Āe | Yes

E tautoko ana koe kia "Whakarahi ake i te wā whakaitinga mai i te kotahi tau ki te toru tau"?

Do you support the "Extending the term of remission from one to three years"?

Āe | Yes

E tautoko ana koe kia "Whakakore i te whakatārewa rēti" hei wāhanga tono i raro i tēnei kaupapa here?

Do you support the "Removal of rates postponements" as an applicable tool under the policy?

Āe | Yes

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Attachment 2 to Report 22.192

Submission #7 – Melissa Love

Have Your Say
1 May 2022, 5:54pm

Ingoa

Name

Melissa Love

Tōpūtanga (mehemea e tika ana)

Organisation (if applicable)

Te Hiko Puaha Trust

E tautoko ana koe kia uru atu "Ngā Whenua Māori Herekore i whakawhiti ki te taitara whānui i raro i te Ture Māori Affairs Amendment 1967" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Māori freehold land converted to general title under the Māori Affairs Amendment Act 1967" as eligible land under the policy?

Āe | Yes

He kupu āu:

Please comment:

The whenua held in the Te Hiko Puaha Trust was taken from our Tupuna in 1960. The whenua at the time was Maori freehold land. In 2012, descendants of the whenua were offered the opportunity to buy back the whenua. The Deed of Purchase was signed 2013 and the whenua returned to the whanau. The whenua was and remains under general title. Whenua offered back or returned to the whanau in similar circumstances, should be deemed as eligible land under the policy, regardless of the legislation involved.

E tautoko ana koe kia uru atu "Ngā Whenua Māori nō te Māori e mau nei i te taitara whānui" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Land in general title collectively owned by Māori" as eligible land under the policy?

Āe | Yes

He kupu āu:

Please comment:

On page 2 of the consultation document, 2.b, states that "Providing economic, cultural or infrastructure support for marae (including papakainga housing); or". AND #6 of the Criteria 'hapū' and 'whānau' should be included immediately after 'marae'. Hapū and whānau have always been at the core of Māori society. #3 of the Criteria - amend to include Maori owned whenua in general title that was bought back after years and generations of inability to invest in or develop the whenua.

E tautoko ana koe kia uru atu "Ngā whenua whakataunga Tiriti" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Treaty settlement land" as eligible land under the policy?

Āe | Yes

E tautoko ana koe kia uru atu "Ngā whenua Māori taitara whānui e whakatupuria ana" hei whenua māraurau i raro i tēnei kaupapa here?

Do you support the proposed inclusion of "Māori land in general title under development" as eligible land under the policy

Āe | Yes

He kupu āu:

Please comment:

Whanau wanting to develop whenua that has been returned, should be given financial assistance in many ways, rates remission being one, to assist with the success of development, given circumstances that have prevented whanau from owning and investing in their whenua throughout the generations.

E tautoko ana koe kia "Whakarahi ake i te wā whakaitinga mai i te kotahi tau ki te toru tau"?

Do you support the "Extending the term of remission from one to three years"?

Āe | Yes

He kupu āu:

Please comment:

#5 of the Conditions should be removed. GWRC should not be able to cancel or reduce the rates remission if the land owner meets the eligibility, criteria or conditions.

E tautoko ana koe kia “Whakakore i te whakatārewa rēti” hei wāhanga tono i raro i tēnei kaupapa here?

Do you support the “Removal of rates postponements” as an applicable tool under the policy?

Āe | Yes

He kupu anō āu e pā ana ki ngā tūtohi panonitanga ki te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori?

Do you have any other comments you would like to make about the proposed changes to the Rates Remissions on Māori Land Policy?

In our situation, whereby 60+ years and 3 generations have passed, the whanau have not had the opportunities to invest in, develop and live on the whenua during that period. This has meant that the whanau have had to purchase other whenua and develop or rent homes elsewhere, separating whanau from whanau and whenua. Rates Remission from both GWRC and Porirua City Council for both development and ongoing, would provide more funding opportunities for the development of our whenua, by reducing the ongoing costs and increasing the likelihood of the whenua generating its own income and becoming self sufficient.

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Submission #8 – Melanie McCormick on behalf of Ātiawa ki Whakarongotai Charitable Trust

Email
2 May 2022

ĀTIAWA KI WHAKARONGOTAI

Submission on Whakaitinga Rēti mō ngā Whenua Māori Rates Remissions on Māori Land Policy

Mai i Kūkūtauākī ki Whareroa, tatu atu ki Paripari

Rere whakauta ngā tinitapu ko Wainui, Ko Maunganui,

Pukemore, Kapakapanui, Pukeatua,

Ūngutu atu ki te pou whakararo ki Ngāwhakangutu

Ko Te Ātiawa ki Whakarongotai e

Our unique identity as indigenous mana whenua, as Ātiawa ki Whakarongotai (Ātiawa), arises from the land and water. As much as we influence the local land and waterscapes, they have shaped who we are as a people; our identities are inextricably linked. The pepeha outlines our rohe from the key waterways and peaks that mark the extent of our mana whenua. Whakapapa, or the genealogical lineage and connection to the land and water, is a fundamental value for the people of Ātiawa. It is through this whakapapa to Ātiawa that we inherit our birthright and responsibility as kaitiaki of all that is living and existing within our rohe.

Thank you for the opportunity to make a submission on the Rates Remissions and Postponements on Māori Freehold Land Policy (to be amended to the Rate Remissions on Māori Land Policy).

Ātiawa in general supports the proposed changes to the policy. The purpose of the amendments, to ensure the policy is up to date and compliant with the legislation for rating of whenua Māori and the principles of Te Ture Whenua Māori Act 1993 has the full support of Ātiawa. In particular, the proposed changes reduce the barriers for owners of Māori land who want to own, use and occupy, build houses on and develop their whenua, is supported and endorsed by the Ātiawa.

The proposed changes better enable owners of Māori freehold land and general land collectively owned by Māori to sustain and strengthen their connection with the whenua while balancing the ability to use and develop land to meet their aspirations through the short, medium and long-term relief from rates. The proposed changes also benefit regional council by reducing administrative costs for the council who may be trying to collect unrecoverable rates.

Ātiawa supports the changes proposed to the policy as set out in the 2022 Te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori/2022 Rates Remission on Māori Land Policy:

- Māori Freehold Land;
- collectively owned Māori land in general title;
- land returned through Treaty settlements;
- Māori land under development; and
- administrative changes.

While Ātiawa are generally supportive of the intent of proposed changes to the policy that addresses land converted from Māori freehold general title, there are concerns that Māori landowners affected by land status conversion through the Māori Affairs Amendment Act 1967 may be unaware of the compulsory change and therefore may be unaware their land may be eligible for rates remission resulting in land left undeveloped due to rates arrears. Ātiawa acknowledge that this was not a result of the regional council, however, Ātiawa would like to encourage that the regional council promote the policy widely among hapori and communities to ensure the policy is accessible and utilised by affected land owners.

Ātiawa seek the following:

- the policy be amended in accordance with 2022 Te Kaupapa Here Whakaitinga Rēti mō ngā Whenua Māori/2022 Rates Remission on Māori Land Policy Consultation Document; and
- the amended policy be widely promoted to ensure it is utilised and its benefits be realised by affected land owners, the community and local authorities alike.

Ātiawa wishes to be heard in support of our submission.

Nāku iti noa, nā,

Melanie McCormick

Taiao Coordinator

Ātiawa ki Whakarongotai Charitable Trust

Attachment 2 to Report 22.192

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