

Finance Committee Agenda - 1 June 2022



Meeting conducted in the Council Chamber at Lvl 2, Philip Laing House
144 Rattray St, Dunedin (Councillors and participating staff only)

Members of the public may view via livestream at: [Otago Regional Council YouTube Channel](#)

Members:

Cr Hilary Calvert, Co-Chair	Cr Michael Laws
Cr Kevin Malcolm, Co-Chair	Cr Andrew Noone
Cr Michael Deaker	Cr Gretchen Robertson
Cr Alexa Forbes	Cr Bryan Scott
Cr Carmen Hope	Cr Kate Wilson
Cr Gary Kelliher	

Senior Officer: Nick Donnelly, acting Chief Executive

Meeting Support: Liz Spector, Governance Support Officer

01 June 2022 09:00 AM

Agenda Topic

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1. APOLOGIES

No apologies were noted prior to publication of the agenda.

2. PUBLIC FORUM

Requests to speak should be made to the Governance Team on 0800 474 082 or governance@orc.govt.nz at least 24 hours prior to the meeting, however, this requirement may be waived by the Chairperson.

3. CONFIRMATION OF AGENDA

Note: Any additions must be approved by resolution with an explanation as to why they cannot be delayed until a future meeting.

4. CONFLICT OF INTEREST

Members are reminded of the need to stand aside from decision-making when a conflict arises between their role as an elected representative and any private or other external interest they might have.

5. MATTERS FOR CONSIDERATION

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6. CLOSURE

5.1. Annual Plan 2022-23 Deliberation and Recommendations

Prepared for: Council
Report No. CS2232
Activity: Governance Report
Author: Mike Roesler, Corporate Planning Manager
Endorsed by: Nick Donnelly, General Manager Corporate Services
Date: 26 May 2022

PURPOSE

- [1] This report is provided to enable deliberation on public feedback to the Otago Regional Council Annual Plan 2022-23 process. This report enables the committee to consider and direct on final adjustments to the draft financial forecasts and work programme and enable staff to complete the Annual Plan for Council adoption at its 29 June 2022 meeting.

EXECUTIVE SUMMARY

- [2] On 30 March 2022 Council agreed a position on the draft financial estimates and associated work programme for the purpose of engaging with the community, and as a critical step towards finalising the Annual Plan 2022-23. The draft position reflected year 2 of the adopted LTP, albeit with some refinement, and was available to the public for feedback from 7 April to 6 May 2022.
- [3] Feedback included a range of support for the LTP, policy suggestions, operational suggestions, and service requests. This report enables Council to consider those service requests and direct on a final position for completing the Annual Plan by 30 June 2022. Based on feedback received, council staff do not recommend any changes in expenditure and associated core work programmes.
- [4] There were requests for additional levels of service and funding. Some of these requests could be developed within existing programmes, such as the ECO Fund, that are included in the draft financial forecasts 2022-23.
- [5] Other funding requests are more substantive and require consideration across, or in reference to, all the Council priorities and desired results. In addition, the request not to reduce, or maintain commitment to the LTP was given by many organisations providing feedback. To some extent Federated Farmers and the other business advocacy groups were the exception.
- [6] Importantly, at this stage of the process Council should not introduce significant change to the draft estimates and associated work programme that hasn't been consulted with the community. Significance in this instance is a legal term and defined in practice by the Council's Significance and Engagement Policy. Broadly speaking, if there is potential for public interest in a matter that has not been consulted on, Council should proceed with caution regarding any decisions made on that matter.

- [7] Councillors requested a workshop (held 10 May) to gain a deeper understanding of the draft position, what constituted the funding requirement, and options and consequences to reduce rate funding. The context for the workshop was the external feedback being received by Councillors about the economy and negative impacts on Otago residents.
- [8] To maximise Councillor time to consider community feedback, information was circulated 18 May 2022. That information is consistent with what is provided in this report.

RECOMMENDATION

That the Committee:

- 1) **Notes** the public feedback on the Otago Regional Council Draft Annual Plan 2022/23
- 2) **Deliberates** on the requests for service and funding made in the public submissions to the Otago Regional Council Annual Plan 2022-23 process and as listed in the Service and Funding Requests report attachment.
- 3) **Directs** Council staff on any changes required to the staff recommendations regarding service and funding requests and/or any other changes to the content scheduled in the Service and Funding Requests report attachment.
- 4) **Directs** Council staff on changes to the draft financial forecasts 2022-23 and work programme for inclusion in Annual Plan 2022-23 to be presented for Council adoption at its 29 June 2022 meeting.
- 5) **Notes** that the Council rates resolution will be provided to the 29 June 2022 Council meeting following adoption of the Annual Plan 2022-23.

BACKGROUND

Decision Process

- [9] The Finance Committee at its 23 February 2022 meeting approved draft financial estimates and the associated work programme as a basis for community consultation. It also approved a consultation approach.
- [10] Council at its 23 March 2022 meeting was then presented with a recommendation to endorse supporting material for community engagement on the draft estimates and work programme, and direct staff to begin that engagement. Council resolved to lay that report on the table for reconsideration at the 30 March 2022 Extraordinary Council Meeting.
- [11] To assist that meeting, staff were instructed to present information about achieving operational efficiencies in the context of not halting achievement of the strategic direction adopted in the LTP. A presentation was provided to Councillors at the 30 March meeting and focused on the following:
 - a. Overview of relationship between the Long-term Plan and draft financial estimates and work programme
 - b. Key activities that have created the proposed general rate and targeted rate increase
 - c. Options to change the timing of the activities that form part of the increase

- d. Summary of current budget expenditure.
- [12] The presentation concluded with three summary points stating:
- a. The draft estimates were constructed within the context of significant inflationary and market cost pressures and efficiency is inherent to delivering the LTP yr2 within the proposed rate increase
 - b. Fully offsetting the general rates increase requires a full rework of the draft estimates and work programme to avoid unintended service impacts.
 - c. A considered rework of the draft estimates and work programme would require time. Meeting the 30 June statutory deadline, particularly if there is high community interest would not be possible.
- [13] The meeting resulted in Council staff being directed to implement the recommendations of the 23 February 2022 Finance Committee. Consultation commenced on 7 April 2022 being one week later than the planned 31 March date.
- [14] Following the 30 March 2022 Council meeting staff were instructed, via e-mailed questions from the Council Chair, to provide information and advice regarding the draft financial estimates 2022-23.
- [15] A Council workshop was held on 10 May 2022 with the purpose of responding to those questions. Attachment 5 provides the workshop agenda.

Community Feedback

- [16] Community feedback was sought on the draft financial estimates and associated work programme for 2022-23. This draft position reflects year 2 of the Council's adopted Long-term Plan 2021-31 as consulted in April 2021. It does include a small number of adjustments as previously reported to Council and identified in the Annual Plan consultation.
- [17] The adjustments were not deemed significant by Council and the overall draft estimates were managed to align with the adopted year 2 fiscal position, being an average total rate increase of 18%.
- [18] Council invited community feedback via an advertising campaign and its online platform Yoursay. A range of information was provided online including:
- a. Draft Annual Plan
 - b. Summary Information
 - c. Rating information
 - d. Feedback Form

- [19] The feedback process ran from 7 April to 6 May 2022.
- [20] Public hearings were not offered for this Annual Plan process, but rather deputations were made available. A small number of organisations requested a strong desire to present and did so at the 25 February 2022 Finance Committee meeting.

DISCUSSION

- [21] Ninety-eight submissions were received, with thirty-three choosing to upload letters outlining their feedback to Council. Recommendation 1 reflects the Council's formal acknowledgment of the community feedback as provided in the following attachments.
 - a. Attachment 2 provides a Table of ALL consultation feedback (i.e., the ninety eight)
 - b. Attachment 3 provides a compilation of the Letters uploaded to the Annual Plan process (i.e., the thirty three)
 - c. Attachment 4 provides an analysis of consultation Feedback Form questions
- [22] The broad categories of feedback included:
 - a. Service requests on the Council's proposed work programme
 - b. Requests for funding on their interests and work programme(s)
 - c. Answers to the Feedback Form questions
 - d. Suggestions and commentary on policy and strategy
- [23] The Service and Funding Requests attachment schedules the feedback on the service and funding requests and enables this committee to direct on recommendations 2 and 3 of this report. To that end, staff have provided recommendations against each service request and a comment for context.
- [24] The requests from the community need to be considered in a broader context of:
 - a. Council's adopted LTP and the direction and priorities within it
 - b. Impacts and considerations regarding the council organisation e.g., its capacity, existing commitments and legal functions and duties.
 - c. Current political preferences and perception
- [25] As outlined in the Background section, the Council has received presentations outlining the Council's activity, how that relates to expenditure and funding, the options available to Council to reduce funding requirements, and considerations relating to the impacts of doing so.
- [26] The analysis of the Feedback Form questions also provides Council with some indication, albeit with limitations, about how the current economic environment might relate to decisions on the Annual Plan. The limitations relate to the low sample size (i.e., between 70 to 80 respondents) and that the sample being self-selected.
- [27] Recommendation 4 enables this Committee to reflect these broader considerations in the final Annual Plan 2022-23 as it sees fit.

OPTIONS

- [28] ORC staff are formally aware of one option, being the consideration of adopting the consulted draft estimates and associated work programme as the Annual Plan 2022-23.
- [29] Councillors have discussed the implications of changes within the economy and the relevance to the draft financial estimates and funding requirements as consulted. To date the information presented by staff to Councillors has outlined options for reducing the proposed rating impact and the risks and impacts of doing so. There is complexity associated with implementing these options, particularly at short notice. For all these reasons council staff are not presenting cuts as a formal option in this report.

CONSIDERATIONS

Strategic Framework and Policy Considerations

- [30] There are no strategic or policy considerations.

Financial Considerations

- [31] The financial impact of motions that involve change to the draft estimates will be provided at the meeting.
- [32] The cumulative impact of motions that involve changes to the draft estimates and the funding position will also need to be considered. Staff will endeavour to provide an estimate of the funding impact at this meeting.

Significance and Engagement Considerations

- [33] The Council agreed that the draft financial estimates and work programme as consulted contained no significant change to its Long-term Plan 2021-31.
- [34] This Committee needs to be mindful of the significance of any change it recommends to the draft financial estimates and work programme as consulted. The Council's policy on this reflects the legislative principles of acting in a transparent and accountable manner. The perception that a council's intentions are authentic and genuine regarding any consultation proposal is a foundation stone for local democracy.
- [35] Importantly, at this stage of the process Council should not introduce significant change to the draft estimates and associated work programme when it hasn't been socialised with the community. Significance in this instance is a legal term and defined in practice by the Council's Significance and Engagement Policy. Broadly speaking, if there is potential for public interest in a matter (for various reasons) that has not been socialised, Council should proceed with political caution regarding any decisions made on that/those matter(s).

Legislative and Risk Considerations

- [36] The risk of material error to statements contained in the Annual Plan increases as the time available to staff to finalise the plan reduces. Assuming a 29 June 2022 adoption date, Council staff have five working days to complete any changes to the draft estimates. This in turn allows 10 days to prepare the rating resolution which is a sizeable computing and technical task that must be accurate. Ten days is the minimum requirement to complete the rating calculations and associated report.

[37] The Significance and Engagement considerations section above identifies a political/perception risk.

Climate Change Considerations

[38] There are no specific considerations other than feedback to the Annual Plan process which includes comments and requests about the Council's climate change programme and approach.

Communications Considerations

[39] Community feedback to the Annual Plan process is available to the public via the Council's Annual Plan webpage.

NEXT STEPS

[40] The 29 June 2022 Council meeting is programmed for approving the Annual Plan 2022-23 and the rating resolution.

[41] Council staff will implement the required changes to the draft Annual Plan between 2 and 23 June 2022 and prepare the rating resolution based on the final funding requirements.

[42] Following adoption of the Annual Plan 2022-23 Council will respond to those that provided feedback via letter or e-mail communications.

ATTACHMENTS

1. Service and Funding Requests [5.1.1 - 10 pages]
2. Table of ALL consultation feedback [5.1.2 - 13 pages]
3. Letters to the Annual Plan 2022-23 [5.1.3 - 115 pages]
4. Analysis of consultation Feedback Form questions [5.1.4 - 4 pages]
5. Summary of 10 May staff presentation [5.1.5 - 1 page]

Annual Plan 2022-23: Service and Funding Requests

Su b No	Name / Organisation	Submitter Request	Manager Recommendations 1. No Change to DAP - no revised action 2. No change to DAP - noting..... 3. No change to DAP - followup action 4. Change to the DAP	Manager Comments
11	Arrowtown Promotion & Business Association	Supportive of the LTP and associated increase in ORC capacity and work programme. Supports the Lake Hayes remediation programme	1. No Change to DAP - no revised action	
11	Arrowtown Promotion & Business Association	Requests the air regional plan work is brought forward. This is an area of up-most concern to our visitors and business community. Request further funding/expenditure to ensure this is delivered within the next 2 years.	1. No Change to DAP - no revised action	Air Plan review starts next financial year. Will be looking at all issues and achieving compliance with NESAQ. Noted useful suggestions,
11	Arrowtown Promotion & Business Association	Request for an additional direct service from Arrowtown to Queenstown via Malagans road at peak hours.	No change to DAP - no revised action	The Malaghans road route has been a feature of discussions within the Way2Go group (ORC, QLDC, WKNZTA).
11	Arrowtown Promotion & Business Association	Request that recent maintenance works of Bush Creek catchment is programmed	1. No Change to DAP - no revised action	Inspection and maintenance work within Bush Creek catchment is included in existing work plan
12	Arrowtown Villiage Association	Public Transport - Increased funding and initiatives to encourage a modal shift and step change to improve usage of the public transport • Expansion of the current public transport networks to include: o feasibility study on a direct bus service via Malaghan s Road from Arrowtown to Arthur s Point o Later services to be introduced on weekend evenings to encourage patronage of Arrowtown s restaurants, bars etc	No change to DAP - no revised action	The Malaghans road route has been a feature of discussions within the Way2Go group (ORC, QLDC, WKNZTA). Modal shift is a key feature of the longer term strategy of the Council and with our partners. Routes can be expanded where demand exists and we are examining the efficacy and efficiency of routes on an ongoing basis.
12	Arrowtown Villiage Association	Request air quality measures reflecting following desired work: • Continuing and enhancing air monitoring both outdoors and indoors as per NIWA research. • Investigate the conducting of trials on a small number of homes with Oeko Tubes www.envirosolve.co.nz • Revisiting funding for air quality education programmes and best practice heating solutions, and enforcement • Work with local Health Authorities to identify and quantify respiratory issues caused by air pollution • Implementing a roadmap to achieving clean reliable heating alternatives. This needs to begin now	1. No Change to LTP - no revised action	Air Plan review starts next financial year. Will be looking at all issues and achieving compliance with NESAQ. Noted useful suggestions regarding measures and the various workstreams that they would represent.

Annual Plan 2022-23: Service and Funding Requests

Su b No	Name / Organisation	Submitter Request	Manager Recommendations 1. No Change to DAP - no revised action 2. No change to DAP - noting..... 3. No change to DAP - followup action 4. Change to the DAP	Manager Comments
15	Brian Dixon	Requests Improvements to AP measures and targets regarding Climate Change - they don't align/reflect the statement. Do existing measures reflect/do justice to the planned programme? If yes then the programme is inadequate and requests ORC develop its programme immediately.	3. No change to DAP - no revised action	Council can consider how (NH and Strategy teams) details on the on-going and planned climate change related work. Some of the work suggested by Mr Dixon is on-going or planned and resourced in the Annual Plan.
15	Brian Dixon	ORC to reconsider position on Air Quality implementation and recognise its responsibility to improve on what it admits is a failure to achieve the NZ air quality standards. Improvement needs to be a priority.	1. No Change to DAP - no revised action	Air Plan review starts next financial year. Will be looking at all issues and achieving compliance with NESAQ. As part of Air Plan review ORC will be assessing monitoring needs.
18	Bus Users Support Group Ōtepoti/Te Roopu Tautoko Kaieke Pahi ki Ōtepoti (Bus Go)	Bus Go is opposed to the planned 1.1 million dollar reduction in the transport budget. Reducing spending on public transport will be detrimental to moves to increase public transport use to reduce carbon emissions from private car use. It could also reduce accessibility and mobility of people with disadvantages or disabilities. Range of operational improvement suggestions provided	No change to DAP - noting that the effect this may have on the ability to fund public transport effectively.	Strategies to improve the efficiency of operations and the public transport network are to be developed over the next 12 months. The Bus Users Support Group has mistakenly assumed that the decrease means less PT services which it doesn't. PT contract costs are still increasing as per the LTP. Transport is still increasing \$2m year on year but it was going to be a \$3m increase. The difference is the reclassification of Supergold.
19	Busines South Inc	Hold the view that all Council's have responsibility for supporting the Otago business community. - Requests a reduction in proposed rate increases - current increases unsustainable for businesses - Requests a desire to collaborate in key work programmes including (UDS, RPS, Otago Regional Wellbeing, Climate Change Initiatives, RMA Reforms) - poses questions about (what is Council doing to support SMEs; What is happening re RLTP; ORED Plan update?; Manuhereki River decisions; what is happening re planning and consenting particularly to support housing)	1. No Change to DAP - no revised action	ORC recognises its role in promoting regional economic wellbeing. It is a member of the ORED working group which has recently identified some priorities for action, in conjunction with regional stakeholders, and hosts the ORED website. A key priority to underpin economic development for Otago identified was the need to support collaboration and connection within the region. ORC will be contributing (including financially) to implementation of initiatives in this space. ORC is also making significant investment as part of the Land and Water Plan to understand the regional economy and in particular its interaction with natural resources. ORC is working collaboratively with a rural Industry Advisory Group as part of this work. This work will also contribute to improving our broader understanding of the vulnerability of Otago's economy to climate change and the actions needed for adaptation and resilience.

Annual Plan 2022-23: Service and Funding Requests

Su b No	Name / Organisation	Submitter Request	Manager Recommendations 1. No Change to DAP - no revised action 2. No change to DAP - noting..... 3. No change to DAP - followup action 4. Change to the DAP	Manager Comments
22	Central Otago Wilding Conifer Control Group	<p>Supportive Feedback with specific requests for next yrs programme: The areas within the specific area of wilding conifer control we would like to see the ORC concentrate on next year are as follows:</p> <ul style="list-style-type: none"> · Complete a survey to identify all infestations of wilding conifers within Management Units not already covered. · Complete a survey of Pinus contorta shelterbelts. · Develop a strategy for getting landowners to remove P. contorta shelterbelts. · Develop a strategy with other stakeholders (CWG, LINZ, Federated Farmers) on how to deal with non-participating landowners who have a significant area of wildings on their property. · Improve knowledge amongst landowners of the Otago Regional Pest Management Plan. · Work to integrate wilding conifers as a control pest into all Environmental Farm Plans. 	2. No change to DAP - noting staff comments	This can be integrated into the regional strategy that is due to be developed in Y2. Biosecurity team can also undertake some of these individuals projects (some are already contained in the biosecurity strategy).
23	Coastal Communities Cycle Connection	<p>In December last year, under the Dunedin Tracks Network Trust, our group was successful in Application to the Department of Internal Affairs (Lottery Community Facilities Fund) for the costs of preparing a technical feasibility study for our project to connect the communities of Waikouaiti-Karitane and Warrington-Waitati with shared-use pathways; connecting these communities to the city and to central and north otago trails in the future. The study will be completed by September 2022 ahead of further funding applications (DIA & other sources) for design and construction. Requests funding from ORC for a project manager to progress the development of our trail to take the pressure off community volunteers.</p>	<p>Off Road Cycleways 2. No change to DAP - followup action to explore Council's role and implications</p>	<p>Under previous and current LTP the ORC has not assumed a core role in the provision of recreational assets and services. Indeed ORC s recent expansion in service provision (and associated funding) has been focused on community outcomes associated with the Environmental management (regulatory framework and the implementation of it). Climate change is adding further complexity and cost to an already challenging delivery environment with Flood Protection and River Management activity having to do more by way of way maintenance, physical works and planning for change. Development of public passenger transport is also a priority that has cross over into climate change policy direction. The activity the Council delivers under this umbrella is deemed as core service and the Otago community has, by in large, accepted that a catchup is required and that it comes at a financial cost.</p> <p>Requests for the ORC s involvement in cycleways (off road) was considered as part of the LTP 2021-31. It was recognised as not being a core service and by definition difficult to justify its prioritisation against the matters described above and prioritised in the LTP. Having said that, there was recognition at a political level that the ORC should, at the least, keep an open mind to either a future case in prioritising the ORC s role in cycleways.</p> <p>Since the adoption of the LTP in June 2021 work investigating the different roles Council could assume was commissioned and a political workshop held on the matter. In addition a policy on Flood Bank use is being prepared. Further political consideration about the role of Council and implications would be advised before further ORC resource is redeployed from the core priorities.</p>

Annual Plan 2022-23: Service and Funding Requests

Su b No	Name / Organisation	Submitter Request	Manager Recommendations 1. No Change to DAP - no revised action 2. No change to DAP - noting..... 3. No change to DAP - followup action 4. Change to the DAP	Manager Comments
29	Department of Conservation	Fully supports the AP proposal with specific comments: -Governance and engagement - Regional Planning - Regulatory - Land & Water - Biodiversity and Biosecurity	2. No change to DAP - noting support for the DAP	
30	Disabled Persons Assembly NZ	- recommends that ORC support moves towards free fare transport for all public transport users, including those who access this via the Total Mobility scheme. In the meantime, ORC should retain the \$2 bus fares and lobby central government for sufficient funding to support this.	No change to DAP - noting the submission for follow up should the funding environment change.	Government policy is key to financial decisions for Regional public transport. This submission will be followed up should any Government funding policy be significantly amended.
30	Disabled Persons Assembly NZ	- recommends that cuts to the air quality monitoring programme be reversed by the ORC so that sampling can resume in all locations around the region to identify where the worst polluted areas are. Steps should be taken to improve air quality for everyone through associated measures such as the ORC contributing funding to businesses and households to assist in the change to cleaner heating methods. These moves would benefit everyone, particularly people with health conditions who live with respiratory	1. No Change to DAP - no revised action	Air Plan review starts next financial year. Will be looking at all issues and achieving compliance with NESAQ. As part of Air Plan review ORC will be assessing monitoring needs. Noted useful suggestions,
30	Disabled Persons Assembly NZ	Recommends that ORC working in collaboration with the DCC engages with the disability community through disabled people s organisations which include DPA, on developing a Disability Community Climate Response Plan which would be incorporated into existing climate change plans/strategies.	1. No Change to DAP - no revised action	ORC has commenced delivering its LTP commitments on climate change. ORC has engaged a Principal Advisor Climate Change, whose role is to work with our region's stakeholders, including QLDC and other TA's and Iwi partners to develop (and implement) a partnership approach to climate change. This builds on the collaborative work we have already done in achieving a regional GHG inventory and Adaptation Risk Assessment.

Annual Plan 2022-23: Service and Funding Requests

Sub No	Name / Organisation	Submitter Request	Manager Recommendations	Manager Comments
32	Dunedin City Council	<p>Otago Harbour Reserves Management Plan. DCC supports collaboration on their Plan. The ORC, DCC and Port Otago committed in 2017 to the formation of a Harbour Stakeholder Group. The DCC is committed to a shared vision for the wellbeing of the Otago Harbour and supports funding for this to be included in ORC s 2022/23 budget.</p> <p>Air Quality : encourages continued monitoring of environmental health indicators and encourages ORC to explore more robust reporting on air pollution.</p> <p>Tomahawk Lagoon: DCC requests greater collaboration regarding Parks and Recreation activity where there are a number of areas where regular ongoing collaboration could be of benefit to both Councils. example of this is increased collaboration on Tomahawk Lagoon could benefit from stronger linkages across our organisations. The DCC, DOC and ORC have an interest in how the lagoon and surrounding spaces are managed.</p> <p>Urban water quality data: DCC request ORC collects more in line with the vision, goals and methods of the ORC s Urban Water Quality Strategy 2017. The DCC is also investing in increased water quality monitoring. supports the ORC reprioritising existing expenditure tagged to developing its Land and Water Plan to complete an economic assessment of Otago s natural fresh water.</p> <p>Public Transport: DCC maintains previously expressed policy position(s)</p> <p>Off Road Cycleways: DCC requests ORC takes an enabling to take an enabling stance for the development of off road, safe trails when it comes to the use of their lands and waterways including the use of their stop banks. An example being the Hawkes Bay Regional Council trail network</p>	<p>Otago Harbour Plan 2. No change to DAP - noting existing commitment to developing this Plan.</p> <p>Air Quality 1. No Change to DAP - no revised action</p> <p>Tomahawk Lagoon 1. No Change to DAP - no revised action</p> <p>Urban water quality data 2. No change to DAP - followup action to clarify DCC's feedback/request</p> <p>Public Transport 1. No Change to LTP/DAP - no revised action</p> <p>Off Road Cycleways 2. No change to DAP - followup action to explore Council's role and implications</p>	<p>Otago Harbour Reserves Management Plan The ORC has provision in the LTP for the development of a Harbour Plan. The initial task is to develop an agree the scope of this plan. It will clearly relate to other plans that concern themselves with aspects of the harbour (ie the edge and waters) that are the responsibility of other organisations such as the DCC (Harbour Reserve Plans) and the Port of Otago (Port Recreational facilities Plan?) and potentially others.</p> <p>Tomahawk Lagoon ORC staff have already been working with DCC on this project.</p> <p>Off Road Cycleways As per Submission 23</p>
33	Dunedin Tracks Network Trust	<p>For the purpose of shared off-road trails across the region request:</p> <ul style="list-style-type: none"> - Commit \$80,000 per year, for the next 3 years, so the Dunedin Tracks Network Trust can contract a Tracks Network Project Manager to progress the development of key tracks and trails across the Otago region. - Enable the development of shared trails leading to, and running beside, waterways - including the ORC s flood control network. 	<p>1. No Change to DAP - followup action to discuss role and implications</p>	<p>Comment Sub 23</p>

Annual Plan 2022-23: Service and Funding Requests

Su b No	Name / Organisation	Submitter Request	Manager Recommendations	Manager Comments
34	Dunedin Tramways Union - Whakakotahitanga Taramu ki Ōtepoti	We oppose the approximately \$1.1million reduction in funding for public transport as it is inevitable that this will result in reduction of real wages for bus drivers. In spite of receiving a petition with hundreds of signatures requesting the council become an accredited Living Wage council, requiring and funding all its contractors to pay their staff the Living Wage, this has not happened. We therefore repeat our request for the Council to become an accredited Living wage council. The council belatedly funded bus drivers wages but has so far not funded this on an ongoing basis. We ask that ongoing funding for public transport contractors to pay a Living wage be included in the Annual Plan.	No change to DAP and notes the request for a policy decision for ORC to become an accredited Living Wage council.	The Dunedin Tramways Union has mistakenly assumed that the decrease means less PT services, which it doesn't. PT contract costs are still increasing as per the LTP. Transport is still increasing \$2m year on year but it was going to be a \$3m increase. The difference is the reclassification of Supergold.
36	Federated Farmers	<p>Specific AP Requests:</p> <ul style="list-style-type: none"> - Wellbeing Report/work: sceptical about value of wellbeing report. Focus on delivery of core work - RPS: LoS target for operative RPS is unrealistic - Regulatory: LoS measures and targets for "effective and efficient compliance monitoring etc" should include success of education first approach" - RPLW: LoS target unrealistic, delay the Plan. - Biodiversity: LoS statement "Collaborate with iwi, DOC, and other key organisations to develop, coordinate and deliver a programme of actions to enhance indigenous biodiversity". Should consider including landowner representation. 	<p>Wellbeing Report</p> <ul style="list-style-type: none"> 1. No Change to DAP - no revised action <p>RPS</p> <ul style="list-style-type: none"> 1. No Change to DAP - no revised action <p>Regulatory</p> <ul style="list-style-type: none"> 3. No change to DAP - followup action <p>LWRP</p> <ul style="list-style-type: none"> 1. No Change to DAP - no revised action <p>Biodiversity</p> <ul style="list-style-type: none"> 2. No change to DAP - follow-up action (see comment) 	<p>Wellbeing Report</p> <p>ORC has a core responsibility under the LGA to promote the four wellbeings. The purpose of the work programme is to establish (with Iwi and TAs) a foundational framework of indicators to monitor regional wellbeing, in order to ensure efficient and effective future investment.</p> <p>RPS</p> <p>Target set to achieve work programme as agreed by Minister for the Environment. Staff committed to meeting that timeframe albeit acknowledge the high Court process will make it challenging.</p> <p>Regulatory</p> <p>LoS measures and targets for "effective and efficient compliance monitoring etc" should include success of education first approach" level of service statements, measures and targets will be reviewed as part of the next LTP. It's important to have targets that can be measured, and there are challenges with our present ability to objectively measure/assess the success/outcomes of the education-first approach.</p> <p>LWRP</p> <p>Targets set in accordance with agreed work programme with Minister. At this stage no ability to delay the plan.</p> <p>Biodiversity</p> <p>Council staff are revisiting the framework for delivering this objective and will consider landowner representation. Integrated Catchment Action Plans will also provide a mechanism to include landowner views.</p>

Annual Plan 2022-23: Service and Funding Requests

Su b No	Name / Organisation	Submitter Request	Manager Recommendations 1. No Change to DAP - no revised action 2. No change to DAP - noting..... 3. No change to DAP - followup action 4. Change to the DAP	Manager Comments
36	Federated Farmers	<p>Fresh Water Implementation: Consider expenditure for more catchment group initiatives</p> <p>Natural Hazards: LoS - target of 3 months for LoS statement "respond efficiently and effectively to damage from natural hazard events" and measure "respond efficiently and effectively to damage from natural hazard events" is a long period. Request that measure shifted to ensure affected communities are consulted and engaged with throughout the process.</p> <p>Policy Related Requests: - lift the Port Otago Dividend - Review rating/funding policy (currently flawed) - increased knowledge sharing between ORC & Fed Farmers - Support strategy that improves PT connecting rural communities</p>	<p>Fresh Water Implementation 2. No change to DAP - noting the ICM was accelerated in LTP</p> <p>Natural Hazards 1. No Change to DAP - no revised action</p>	<p>Natural Hazards Repairs are identified and prioritised throughout the course of a flood event, however the three month time period allows for flooding to subside and for ORC to then make a full assessment of the repairs required, including liaising with affected landowners and communities, before communicating a full repair programme within this time period.</p>
37	Forest and Bird Dunedin/Otepoti	<p>Requests: - Forest & Bird supports the ORC's ambitious work plan and seeks that the work required to protect and restore Otago's ecosystems is not removed due to budget constraints</p>	1. No Change to DAP - no revised action	
39	Friends of Lake Hayes Society Inc	Friends of Lake Hayes Society Inc continue to support the investment in Lake Hayes remediation as per the original Long Term Plan adopted by Council for the 2021-31 period. FOLH looks forward to further developing its collaborative relationship with ORC as well as with other agencies including Iwi, QLDC, DOC, Fish and Game, NZTA, and LINZ, in progressing all programmes leading to the remediation of Lake Hayes	1. No Change to DAP - no revised action	
45	Heike Cebulla	Increase our rates or change the use of our money so that buses in Otago can be offered free of charge. In our endeavor of reaching Carbon Zero by 2050 we must act now and not delay action.	1. No Change to DAP - no action	Funding considerations from Central Govt, inform this decision process. All renewal contracts require the provision of low or no emission options
51	Otago Yatch Club	Requesting ORC LTP makes provision for improving harbour amenity	1. No Change to DAP - no revised action	Could be considered as part of the proposed Harbour Plan but obviously subject to the scope of that Plan
54	Julian Zacco Nieves	Requests a program for land owners to acquire or rent traps at a low price for region-wide trapping of pest species? Makes broader point that the ORC (in general) needs to investigate different approaches to problem solving	3. No change to DAP - followup action	Staff suggest that an application is submitted to the Ecofund. The administration of supporting a scheme would be better funded through the Ecofund, or Otago Catchment Communities.
68	Otago Helicopter Trust	Attached - Grateful for the inclusion of the ongoing annual donation of \$350,000 that is budgeted to continue across the ten years covered by the Long-Term Plan.	2. No change to DAP - noting the support	

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69	Otago Peninsula Community Board	Presents feedback consistent with the submission to the LTP regarding: - Harbour management Plan - SW filters - Dredging the Eastern Channel - Public Transport service improvements - Biosecurity on the Peninsula - priority to build on the gains	1. No Change to DAP - no revised action	Harbour management- Council notes this matter was raised in the LTP process. The Board will be aware a process with funding was initiated to consider this matter in more detail Dredging the Eastern Channel - this request was considered as part of the LTP process Biosecurity: The LTP introduced significant increase in funding in the operational/delivery biosecurity/biodiversity functions of ORC will allow for greater community partnerships and further provision of knowledge, education and compliance activities to support environmental outcomes of the community.
71	Protect Our Winters NZ	Request public transport to connect Wanaka and Queenstown. Requests intraregional public transport connecting Dunedin to Alexandra, Cromwell, Wanaka and Queenstown. Currently the only option is with an expensive and inconvenient private bus.	No change to DAP-noting this issue.	With growth in the sub-region, the intent is for Council to consider funding a business case in the next LTP period to provide the evidence to meet WKNZTA processes for co-investment.
72	PSA	- Resist any campaign for service cuts. - Act now to support effective climate action - Other internal organisation policy matters	1. No Change to DAP - no revised action	
74	Queenstown Lakes Climate Reference Group	Requests the ORC: · Commits to current deliverables agreed in years 1 to 3 LTP · Establishes a foundation for regional climate action leadership · Commits to greater collaboration with TAs, Iwi and community stakeholders to achieve objectives · Moves from planning and report writing to implementation · Establishes a Climate and Biodiversity Action Plan to oversee projects and action points	1. No Change to DAP - no revised action	ORC has commenced delivering its LTP commitments on climate change. ORC has engaged a Principal Advisor Climate Change, whose role is to work with our region's stakeholders, including QLDC and other TA's and Iwi partners to develop (and implement) a partnership approach to climate change. This builds on the collaborative work we have already done in achieving a regional GHG inventory and Adaptation Risk Assessment. ORC is aware of and provided comments on the QLDC climate and biodiversity action plan and is supportive of its direction. ORC will be reviewing its approach to biodiversity action when the NPS IB is released (and in light of improved information which has been collected by our Science team) and climate change will be an important consideration.

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75	Queenstown Lakes District Council	QLDC key requests include: - Reverse the LTP decision on Air Quality Implementation - More Public Transport along with escalating fleet replacement (lower carbon) - Increase our BioD & S work (from a Climate Change perspective)	Air Quality Implementation 1. No Change to DAP - no revised action Public Transport 1. No Change to DAP - no revised action Biodiversity & Biosecurity No Change to DAP - no revised action	Biodiversity & Biosecurity Council was very considered in its decision on LTP priorities, increasing services, funding impacts and subsequent impacts on the community. Biosecurity was a activity that recieved a significant increase in resource in the LTP. This was consulted with a range of feedback received including 'do more'.
77	Richard Bowman	Attached - Endorses LTP - endorses progress on Lake Hayes - encourages more work communicating and promoting Wilding Conifer work - encourages continued efforts re Rabbit management and property owner responsibility - supportive of ORC increasing engagement in field	1. No Change to DAP - no action	
80	Sergey Ryazanov	Your new measure: "Annual public transport boardings per capita" - you do not specify the rate. Do you have data on how many people use it on a regular basis? If yes, why not to disclose and be more specific on your measures?	2. No change to DAP - noting that data acquisition methods and breadth are undergoing an improvement for Public Transport. We will be gathering information from our patrons and operators through the next year to assist in measuring performance as well as improving our delivery.	Measure can be added. Data is readily available on patronage and individual use on a route by route basis and can be utilised.
83	Southern Lakes Sanctuary	To encourage ORC to budget for becoming a partner in the SLS project in a manner similar to PF Dunedin so as to allow the SLS to be able to match funding with PF2050 Ltd and increase eradication work in Otago	1. No Change to DAP - no revised action	The Council considered this matter very carefully during the LTP process (May 2021) and made a decision that it could not increase its funding support for this type of pest control activity without changing its overall prioritisation of Council-wide service delivery and/or increase its funding impost on Otago ratepayers. Council notes that rate sourced funding constraints have, if anything, become greater since adopting the LTP in June 2021.

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			1. No Change to DAP - no revised action 2. No change to DAP - noting..... 3. No change to DAP - followup action 4. Change to the DAP	
86	Taieri Trails Trust C/- Colin Brown	"Taieri and Clutha flood protection scheme reviews" work should include giving consideration to how the management of the Taieri Floodbanks could be modified to provide for improved recreational access by walkers and cyclists	Off Road Cycleways 2. No change to DAP - followup action to explore Council's role and implications	As per sub 23
88	Otago Fish and Game Council	Supports and implores the ORC to resource adequately. Given the amount of work required in short timeframes, it is clear to Fish and Game that even the level of resourcing envisaged in the Long Term Plan may not be enough. Cutting resourcing from work streams will risk critical environmental work and simply add to the burden of historic underinvestment, making it more difficult and costly for future generations to tackle the issues.	2. No change to DAP - noting support for the DAP	
92	Unions Otago	Attached - Policy decision on Living Wage to all Council suppliers and contractors	1. No Change to DAP - and notes the request for a policy decision for ORC to become an accredited Living Wage council.	
95	Whakatipu Wilding Conifer Control Group Inc (WCG)	That Otago Regional Council continues to support the community-led Whakatipu Wilding Conifer Control Group Inc (WCG) with annual funding from a targeted rate of \$2.02, at a minimum of \$100,000 plus inflation, as outlined in the ORC Annual Plan, to control wilding conifers as described in the Otago RPMP but to also consider further increasing this amount to be more in line with other funding bodies contributions.	2. No change to DAP - noting staff comments	This can be integrated into the regional strategy that is due to be developed in Y2. Biosecurity team can also undertake some of these individuals projects (some are already contained in the biosecurity strategy).
98	Yellow-eyed Penguin Trust	<ul style="list-style-type: none"> - Continue to prioritise and fund both ORC work plans and other initiatives (such as Eco Fund) that support biodiversity protection and enhancement in Otago. - Invite community conservation groups to participate in the planned regional biodiversity hui. 	3. No change to DAP - followup action	Council staff will follow up regarding plans for engagement in biodiversity hui (and our broader plans for this structure)

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1	A Smith	Dunedin	No change - stick with a long term perspective and build capacity in areas agreed (e.g.,	Yes		No			Facebook
2	Alison Cree	Otepoti Dunedin	No change - stick with a long term perspective and build capacity in	Yes		No		Please do not weaken the actions that have been proposed to benefit the natural environment and increase the use of public transport.	Newspaper
3	Alison Maynard	Dunedin	Watching brief – use the next 6 months to better understand how			I expect Council to decide		no	
4	Allan Henry	Dunedin	No change - stick with a long term perspective	Yes		Yes	Continue with the voted plan		Otago Regional Council website Newspaper
5	Amir Levy	Dunedin	No change - stick with a long term perspective and build capacity in	Yes		Yes	Every effort should be made to continue the LWRP work (science, compliance, consenting)		
6	Andrea Johnston	Dunedin	No change - stick with a long term perspective	Yes		I expect Council to decide			Otago Regional Council website, Councillor, Newspaper
7	Andrew Bush	Alexandra	No change - stick with a long term perspective and build capacity in	Yes		Yes	There should be no reduction in the ORC work programme. This appears to be a council that is too ready to defer decisions.		
8	Andrew Harvey	Oamaru				Yes	I would expect the Council to evaluate options, present these to ratepayers for comment, and then the Councillors should determine based on feedback. That's why we have councillors.	Attached - Policy and operational approach Pest management (rabbits)	I asked about it, eventually one of the ORC staff kindly answered my question on a direct approach. Newspaper
9	Andrew Millar	Wanaka	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)	Yes	There is no doubt that ORC has a fair backlog of work to be done, partly through previous inaction and partly on account of increasing demands relating to guardianship of our increasingly vulnerable environment and matters relating to climate change. These matters, and the consequent funding demands, were laid out clearly in the original plan, and received overwhelming support via submissions. It is not possible to achieve the agreed objectives by changing course in mid-stream, indeed it will render achievement more difficult and costly further down the track. It is my view that certain Councillors who have suggested reducing the agreed rate increase in the coming year (and beyond?) are in dereliction of their duty to carry out the previously agreed wishes of the constituents, all in the pursuit of short term electioneering. Yet those Councillors have no proposal as to just what items they will cut from the plan.			Forge ahead with the plan. Our environment cannot afford to put things on hold. Likewise as regards preparedness for climate change events. NB. Because I have not entered a response to Q.10, do not take it that I do not have any strong preferences on the matter. The strong preference is for NO work reduction.	

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10	Andrew Powazynski	Oamaru	Watching brief – use the next 6 months to better understand how NZ and our communities are impacted by current issues and then revisit the LTP programme	Yes		I expect Council to decide		<p>Waitaki District Councils special plan is just about to be adopted into the District Plan (July I believe). One of the plans is to reduce urban spread by filling in the open spaces between Weston and Oamaru. Which in turn will inevitably mean that the (mainly) current Rural Residential zoning will be re zoned either to Residential or Residential 1 to allow for further subdivision.</p> <p>My concern around the potential subdivision of this space is the environmental impact any earthworks and subdivisions are going to have on the whole of one of our main water catchment areas, Oamaru Creek. This Creek follows the contours and meanders along and through the middle and whole length of the open space potentially earmarked for development.</p> <p>It is fact and known, that a subdivision application has been submitted to the Waitaki District Council to build a further 16 lots at the lower end of the Oamaru Creek between Old Mill Rd and Parsons Rd (straddling over Oamaru Creek) . It is currently on hold waiting for further engineering information. These 16 lots are currently zoned Rural Residential, could under the special plan change giving potential to be sub divided further, thus putting further pressure on the Creek, through run off, storm water and sediment build up let alone what will happen around flood protection.</p> <p>In has come to light from ORC that there isn't enough evidence or information around the adverse effects any of this will have on the Creek, either from any historic evidence/information. And that is before we even discuss flood protection. Any historical evidence/information/data in any of the WDC District Plans on flood protection or what effects earthworks or sub divisions may have had on the Creek previously is very vague to non existent.</p> <p>To that end, I request that ORC carryout a thorough and full assessment of environmental effects on the Oamaru Creek catchment and provide ratepayers with a detailed open public report on conclusion of that assessment. Further to this, ORC should not be supporting any new subdivision applications until the effects are clearly and fully understood of the ongoing effects they will impose on the Creek now and in the future. And a proper plan be in place on how to mitigate any such effects, both environmentally and flood protection.</p>	
11	Arrowtown Promotion & Business Association	Queenstown	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)			No		<p>All included in our attached submission.</p> <p>Attached - Supportive of LTP and increasing ORC capacity and associated work programme Requests Air Quality programme accelerated Request for an additional direct service from Arrowtown to Queenstown via Requests recent maintenance work Bush Creek catchment is programmed Malagens road at peak hours.</p>	Otago Regional Council website
12	Arrowtown Village Association	Arrowtown	Watching brief – use the next 6 months to better understand how NZ and our		Some allowance needs to be made for preparatory work to inform ORC for its forthcoming Air Quality Strategy			<p>Attached - Request regrading Air Quality programme Request regarding Public Transport</p>	Councillor
13	Barbara Hore	Alexandra	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality	Yes		I expect Council to decide			Online advertising
14	Billee Marsh	Cromwell	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality	Yes		I expect Council to decide		I strongly support council progressing improvement of our streams, rivers and lakes. I ask the council to respect Mana O Te Wai and protect our rivers from over allocation, pollution and degradation.	Otago Regional Council website

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15	Brian Dixon	Dunedin			The LTP is inadequate to meet the urgent need for action on air quality and climate change - with recent IPCC reports saying we cannot afford delays in implementing plans for significant mitigation and need to prepare now for adaptation. New scientific evidence informs us that coastal inundation in our region is projected to happen much sooner and to a greater extent than we understood last year. This shifts the imperative to take action to right now!	I expect to be consulted on clear options (supported by information on the implications).		Attached - Request to improve measures and targets related to climate change and/or develop ORC's programme immediately Requests the acceleration of ORC's Air Quality implementation programme	Appeared on LinkedIn link
16	Bryan	RANFURLY	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment;			Yes	Employing Consultants Make your own decisions as you used to do. The constant increase in rates is unfair and we have no idea where that many is going	Rates have to be kept at a minimum. More honest interaction with rate payers and a fairer distribution of work done in rural areas	Newspaper
17	Bryan Keane				When will rates get below 12% or is that my dream	Yes	Reduce excess spend on bike lanes, wilding pines. Why not help bus drivers for a change all stops to be safe for passengers - this has been asked for years*would not cost too much to alter.	Seems to me the ORC spends more time with inhouse fighting with your staff (also occurring at DCC - power and ego's). Councillors from both organisations need to get on with the job they are paid for.	Councillor Newspaper
18	Bus Users Support Group Ōtepoti/Te Roopu Taūtoke Kāiēke Pahi ki Ōtepoti (Bus Go)	Dunedin	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)	Yes		Yes	It should not reduce its work programme	Bus Go is opposed to the planned 1.1 million dollar reduction in the transport budget. Reducing spending on public transport will be detrimental to moves to increase public transport use to reduce carbon emissions from private car use. It could also reduce accessibility and mobility of people with disadvantages or disabilities. Other suggestions for ORC to work on to improve public transport in 2022-2023 suggested by our members and bus users are as follows: Improve internet on buses. Free internet at bus hub. Keep buses running on streets with road works, even if the streets are closed to cars. We are facing much increased bus disruptions currently. Don't cancel buses. Actively recruit more drivers. Ask bus companies to employ spare drivers. If need be review the timetables. The new contracts should have strong penalties which are enforced. Ask bus companies to provide taxis to traverse bus routes, informing passengers when buses are cancelled and picking them up or calling further taxis, all at the cost of the bus company. Perspex shields for drivers, to make them safe from Covid.	Councillor, Otago Regional Council website, Facebook, Radio, Newspaper

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	Bus Users Support Group Ōtepoti/Te Roopu Tautoko Kaiake Pahiri ki Ōtepoti (Bus Go)							<p><i>*continued from above*</i></p> <p>Remove source from destination display on buses. e.g. "Logan park to Balaclava" should just say "Balaclava"</p> <p>Establish a public, transparent suggestion box. Responses in public including reasons. Treat all suggestions throughout the year as Annual Plan requests.</p> <p>User representation on ORC PT planning meetings</p> <p>We support improving the frequency on the "Ridge Runner" No 15 to at least every 15 minutes, to provide better connections wherever it intersects with other routes.</p> <p>We support making 15 a full loop instead of as at present ending at Forth St/Andersons bay Rd. As it would intersect with nearly all other bus routes, we do not think it needs to travel via the Bus Hub. Instead it could travel between South Dunedin and the University via the Harbourside area, where there are 100 or so workers each day, opening this area up to public transport use and freeing up traffic congestion in the area. The Ridge Runner should be renamed "orbiter" to better advertise its loop status. This could build on the success of Orbiter buses in Hamilton and Christchurch.</p>	
19	Busines South Inc							<p>Attached - State a belief that all Councils have responsibility for supporting the Otago business community.</p> <ul style="list-style-type: none"> - Requests a reduction in proposed rate increases - current increases unsustainable for businesses - Requests a desire to collaborate in key work programmes including (UDS, RPS, Otago Regional Wellbeing, Climate Change Initiatives, RMA Reforms) - poses questions about (what is Council doing to support SMEs; What is happening re RLTP; ORED Plan update?; Manuherekia River decisions; what is happening re planning and consenting particularly to support housing) 	
20	Callan Brash	Oamaru	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of environment)	Yes		I expect Council to decide			
21	Central Otago Dark Skies Society Incorporated	Tarras	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of environment)	Yes		No		Keep our unique dark skies safe. Urban and industrial light pollution needs to be controlled as well as air and water and ecosystems. It is easy to do by grandfathering existing lighting but then requiring sensible Dark Skies lighting guides for new lighting in the region	Online advertising
22	Central Otago Wilding Conifer Control Group Inc.	Alexandra	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of environment)	Yes				Attached - Supportive feedback and specific programme requests/priorities for next year	
23	Coastal Communities Cycle Connection	North Coast of Dunedin	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of environment)	Yes				In December last year, under the Dunedin Tracks Network Trust, our group was successful in Application to the Department of Internal Affairs (Lottery Community Facilities Fund) for the costs of preparing a technical feasibility study for our project to connect the communities of Waikouaiti-Kaitane and Warrington-Waitati with shared-use pathways, connecting these communities to the city and to central and north otago trails in the future. The study will be completed by September 2022 ahead of further funding applications (DIA & other sources) for design and construction. Requests funding from ORC for a project manager to progress the development of our trail to take the pressure off community volunteers.	
24	Colin L Weatherall	Brighton / Green Island	Watching brief – use the next 6 months to better understand how			I expect Council to decide			Newspaper

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25	Colin Sourr	Outram	Immediate 'pause' of the LTP programme – results in a reduced or delayed work programme and reduced rate increase	No	Increased work on the Taieri Flood and Drainage Schemes should be halted until the review of the Rating Classification has been undertaken	Yes	Reduce the use of consultants for the engineering investigations and performance reviews. The information is held within the council and staff should do the work on these. If the staff are not available the work should not be undertaken.	I support a reduction of rates in this annual plan compared to the Long Term Plan. The review of the Taieri Flood and Drainage rating classification needs to be undertaken as soon as possible.	Otago Regional Council website
26	Damien McNamara	Oamaru	Watching brief – use the next 6 months to better understand how NZ and our communities are impacted by current		ORC needs to factor in light pollution and how it not just impacts ecosystems, but increases potential medical issues on an already under the pump health system.!	No		A lot of councils in Otago are looking at implementing outdoor lighting policies, this will please dark sky advocates. I am happy to see them around control of lighting for ecological and biological reasons. ORC needs to adopt some kind of baseline for local author ties to look to. LED outdoor lights with a colour temperature no greater than 2700K, fully shielded from light trespass, etc.	
27	David George Maynard	Dunedin	Watching brief – use the next 6 months to better understand how			No			Otago Regional Council website
28	De Clifford	dunedin	Immediate 'pause' of the LTP programme – results in a reduced or	No			I expect Council to decide	It obviously cannot be afforded.	Newspaper
29	Department of Conservation	Alexandra	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)				I expect Council to decide	Attached - fully supports the AP proposal with specific comments: -Governance and engagement - Regional Planning - Regulatory - Land & Water - Biodiversity and Biosecurity	
30	Disabled Persons Assembly NZ							- recommends that ORC support moves towards free fare transport for all public transport users, including those who access this via the Total Mobility scheme. In the meantime, ORC should retain the \$2 bus fares and lobby central government for sufficient funding to support this. - recommends that cuts to the air quality monitoring programme be reversed by the ORC so that sampling can resume in all locations around the region to identify where the worst polluted areas are. Steps should be taken to improve air quality for everyone through associated measures such as the ORC contributing funding to businesses and households to assist in the change to cleaner heating methods. These moves would benefit everyone, particularly people with health conditions who live with respiratory conditions - recommends that ORC working in collaboration with the DCC engages with the disability community through disabled people's organisations which include DPA, on developing a Disability Community Climate Response Plan which would be incorporated into existing climate change plans/strategies.	
31	Dr Barrie J Wills	Alexandra	Watching brief – use the next 6 months to better understand how NZ and our communities are impacted by current issues and then revisit the LTP programme		Short answer is Yes, but more in the way of tangible outcomes are needed to satisfy the increased ratepayer investment. Currently there is too much emphasis on monitoring and reporting to Council.	Yes	Re Q10 - give public transport to the District Councils and reconfigure that funding into improving Otago's environmental status as that will naturally progress into C-sequestration gains.	I detect too little in the way of tangible outcomes that will satisfy ratepayers that their annual contribution, set to rise considerably, is spent wisely. There is too much monitoring, too many reports to Council. ORC staff need to be out in the field, engaged in practical projects and assessment work in tandem with landowners and other environmental groups. Attachment - Critique of the LTP/AP via comments and questions. Summary comment states "too little in the way of tangible outcomes that will satisfy ratepayers that their annual contribution, set to rise considerably, is spent wisely. There is too much monitoring, too many reports to Council. ORC staff need to be out in the field, engaged in practical projects and assessment work in tandem with landowners and other environmental groups."	Councillor, Otago Regional Council website, Newspaper

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32	Dunedin City Council							<p>- Otago Harbour Reserves Management Plan. DCC supports collaboration on their Plan. The ORC, DCC and Port Otago committed in 2017, to the formation of a Harbour Stakeholder Group. The DCC is committed to a shared vision for the wellbeing of the Otago Harbour and supports funding for this to be included in ORC's 2022/23 budget.</p> <p>- Air Quality : encourages continued monitoring of environmental health indicators and encourages ORC to explore more robust reporting on air pollution.</p> <p>- Tomahawk Lagoon: DCC requests greater co laboration regarding Parks and Recreation activity where there are a number of areas where regular ongoing collaboration could be of benefit to both Councils, example of this is increased collaboration on Tomahawk Lagoon could benefit from stronger linkages across our organisations. The DCC, DCC and ORC have an interest in how the lagoon and surrounding spaces are managed.</p> <p>- urban water quality data: DCC request ORC collects more in line with the vision, goals and methods of the ORC's Urban Water Quality Strategy 2017. The DCC is also investing in increased water quality monitoring, supports the ORC reprofiting existing expenditure tagged to developing its Land and Water Plan to complete an economic assessment of Otago's natural fresh water.</p> <p>- Public Transport: DCC maintains previously expressed policy position(s)</p> <p>- Off Road Cycleways: DCC requests ORC takes an enabling to take an enabling stance for the development of off road, safe trails when it comes to the use of their lands and waterways including the use of their stop banks. An example being the Hawkes Bay Regional Council trail network</p>	
33	Dunedin Tracks Network Trust	Dunedin					<p>The Otago Regional Council, through its role as 'caretaker' of our environment has a pivotal role to play in relation to the development of tracks and trails connecting our communities with a) surrounding communities and infrastructure and b) our amazing local landscapes.</p> <p>The Dunedin Tracks Network Trust asks that the Otago Regional Council shows leadership and commits both financially and strategically to the development of a network of shared trails across Dunedin and the Otago region.</p>	<p>Attached - For the purpose of shared off-road trails across the region request:</p> <ul style="list-style-type: none"> - Commit \$80,000 per year, for the next 3 years, so the Dunedin Tracks Network Trust can contract a Tracks Network Project Manager to progress the development of key tracks and trails across the Otago region. - Enable the development of shared trails leading to, and running beside, waterways - including the ORC's flood control network. 	
34	Dunedin Tramways Union, Whakakotahitanga Taramu ki Ōtepoti (NZ Tramways and Public Passenger Transport Employees Union Dunedin Branch Incorporated, registered	Dunedin	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)			No		<p>We oppose the approximately \$1.1million reduction in funding for public transport as it is inevitable that this will result in reduction of real wages for bus drivers. In spite of receiving a petition with hundreds of signatures requesting the council become an accredited Living Wage council, requiring and funding all its contractors to pay their staff the Living Wage, this has not happened. We therefore repeat our request for the Council to become an accredited Living wage council. The council belatedly funded bus drivers wages but has so far not funded this on an ongoing basis. We ask that ongoing funding for public transport contractors to pay a Living wage be included in the Annual Plan.</p>	Otago Regional Council website, Newspaper
35	Elm Grove Limited	Mosgiel	Immediate 'pause' of the LTP programme – results in a reduced or delayed work programme and reduced rate increase	No	The work program for the Lower Taieri Flood and Drainage Schemes is unaffordable, as these large cost increases are being born by too few targeted ratepayers.	Yes	No significant work or expenditure should proceed on the Lower Taieri Flood and Drainage Schemes until an independent review of the rating classification and scheme performance is undertaken.	<p>The current proposed increases for targeted rates on the Lower Taieri Flood Protection and Drainage schemes are just not sustainable. We desperately need our councillors to ensure that an independent review of the rating classification is undertaken before any significant expenditure proceeds.</p>	Otago Regional Council website

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36	Federated Farmers NZ	Dunedin						<p>Specific AP Requests:</p> <ul style="list-style-type: none"> - Wellbeing Report/work: sceptical about value of wellbeing report. Focus on delivery of core work - RPS: LoS target for operative RPS is unrealistic - Regulatory: LoS measures and targets for "effective and efficient compliance monitoring etc" should include success of education first approach" - RPLW: LoS target unrealistic, delay the Plan. - Biodiversity: LoS statement "Collaborate with iwi, DOC, and other key organisations to develop, coordinate and deliver a programme of actions to enhance indigenous biodiversity". Should consider including landowner representation. - Fresh Water Implementation: Consider expenditure for more catchment group initiatives - Natural Hazards: LoS - target of 3 months for LoS statement "respond efficiently and effectively to damage from natural hazard events" and measure "respond efficiently and effectively to damage from natural hazard events" is a long period. Request that measure shifted to ensure affected communities are consulted and engaged with throughout the process. <p>Policy Related Requests:</p> <ul style="list-style-type: none"> - lift the Port Otago Dividend - Review rating/funding policy (currently flawed) - increased knowledge sharing between ORC & Fed Farmers - Support strategy that improves PT connecting rural communities 	
37	Forest and Bird Dunedin/Otepoti							<p>Requests:</p> <ul style="list-style-type: none"> - Forest & Bird supports the ORC's ambitious work plan and seeks that the work required to protect and restore Otago's ecosystems is not removed due to budget constraints 	
38	Frances Anderson	Alexandra	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)	Yes		Yes	No reduction on expenditure related to air quality, water and climate change issues. We have obligations locally, nationally and globally and cannot keep "kicking the can down the road".	<p>What is planned regarding climate change - water, air and environment is minimal in relation to what is actually required. Expenditure on air quality for example will decrease heath expenditure many times over. Make it safe for our children to leave the school buildings and play sport without their lungs taking in fumes from burning fossil fuels. Get the rivers flowing how they should be. You are obligated. Spend less on in-fighting (disgraceful conduct and expenditure on a councillor who has an extraordinary record of causing dissension wherever he goes) and get on with what we are paying you for. Show courage and do what we need to do for our succeeding generations - no wonder our young people resent us.</p>	Newspaper
39	Friends of Lake Hayes Society Inc	Queenstown	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)					<p>Attached - Friends of Lake Hayes Society Inc continue to support the investment in Lake Hayes remediation as per the original Long Term Plan adopted by Council for the 2021-31 period. FOLH looks forward to further developing its collaborative relationship with ORC as well as with other agencies including iwi, QLDC, DOC, Fish and Game, NZTA, and LINZ, in progressing all programmes leading to the remediation of Lake Hayes</p>	
40	Gavin Dann	Alexandra	Watching brief – use the next 6 months to better understand how NZ and our communities are impacted by current issues and then revisit the LTP programme	No	You have entered a bottomless pit. Better to stick to your knitting. Too much use (and cost) of consultants	I expect Council to decide		<p>Regional Council is becoming a behemoth for compliance issues and areas that are bottomless pits for ratepayer's money. Legal expenses and consultants fees are unacceptable. Council seems to be dysfunctional over a number of issues. For example, Manuherikia River issues. Why doesn't ORC take the initiative with Falls Dam Company and look at raising the dam, providing more storage, resulting in a win/win situation for all parties. This could be funded from Central Government together with local governments & residents from the wider area, all of whom have some interest in this important Otago river. Council's inability to solve the issues around this river are a damning example of its ineffectiveness and ongoing waste of ratepayers money.</p>	Facebook, Radio, Newspaper

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41	Genevieve Robinson	Dunedin	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)		Immediate effect to Seawall and harbour restoration in accordance with climate issues and impending resurgence of water - allow effect to the NZ OPS in protecting species, such as their white-faced heron, and other wading shore birds, marine mammals and others, that deserve far more than this mess of discarded tyres, metal, discarded set nets and the like.	Yes		Funding should be allocated with urgency, to climate change issues. The harbour is the least protected harbour... With just 45 Hector's Dolphin remaining, and a raft of native wading shore birds and declining seal and sea Lion populations Photo of wading bird in degraded Harbour/estuary area	Otago Regional Council website
42	George and Sandra Page	Arrowtown	Watching brief – use the next 6 months to better understand how NZ and our	No		No		The ORC need to stop wasting money on their in-house bickering and reduce the amount proposed for the proposed 5 star offices.	Newspaper
43	Glynn B	Dunedin	No change - stick with a long term perspective and build capacity in	Yes		No		Allow the rates to be paid monthly, fortnightly etc and for the dates to be able to suit the ratepayers pay cycle.	Facebook
44	Growing Solutions for the Vincent Plan.	Clyde	Watching brief – use the next 6 months to better understand how NZ and our communities are impacted by current issues and then revisit		Peacing together this and that, finding the pattern, solving the problem. The old Clyde residents need the OK to be involved in the Clyde plan for the benefit of the Vincent ward. Community inputs, Clyde RSA, resident and ratepayers, schools, service groups.	I expect Council to decide		Get on with it as we have all waited since the 1989 reforms, but work with Southland - Otago local government and combined services for a regional training Tekapo Military camp. Attached - staff not certain the feedback relates to LTP/AP process?	Otago Regional Council website
45	Heike Cebulla	Musselburgh, Dunedin	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)	Yes		No		'Kia ora koutou katoa, As I have indicated in my previous submissions I am encouraging the Otago Regional Council (again) to either: - increase our rates or change the use of our ratepayers' money so that busses in Otago can be offered free of charge. In our endeavor of reaching Carbon Zero by 2050 we must act now and not delay action. - pass the reigns over to the DCC whose rates volume surpasses the ORC's rates volume and is thus in a much better position to rethink the idea of public transport - just like libraries, swimming pools, etc. public transport is a need that all citizens of Otago should have free access to. If we are serious about a shift in how we get around town -> a transport mode shift so to speak we need to make the environmentally friendly transports so cheap that people can make the shift. Tena koe me nga mihi	Newspaper
46	I M Turnbull	Wanaka	No change - stick with a long term perspective and build capacity in areas agreed (e.g.,	Yes	The LTP was developed following public input; that input said "get on with it". So please just get on with it!	I expect Council to decide		As above: the plan says what the community wants the ORC to do, so let us get on with it.	Otago Regional Council website, Newspaper
47	Ian Telfer	Dunedin	No change - stick with a long term perspective and build capacity in	Yes		I expect Council to decide			
48	IH & DJ Bryant	Outram	Immediate "pause" of the LTP programme – results in a reduced or delayed work programme and reduced rate increase	No		I expect Council to decide		The way the targeted rates are set for the targeted Lower Taieri Flood Protection and West Taieri Drainage, simply reinforces the disadvantage tangata whenua from the Henley Kaika experienced when the two above schemes were created. Tangata whenua(including my family) lost their kaika and mahinga kai sites to these two schemes and now have the highest classification rating in these schemes to remain living in their area of Henley/Otokia	Newspaper
49	Jason Blair	dunedin	No change - stick with a long term perspective and build capacity in areas agreed (e.g.,	Yes		I expect Council to decide		I see there was a comment regarding the increased and ongoing cost for the busses in Dunedin, is this the same for Queenstown? I believe these are great services and something tangible we get out of our rates.	Radio

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50	Jim Ledgerwood	Wanaka	Immediate 'pause' of the LTP programme – results in a reduced or delayed work programme and reduced rate increase	No	Please pause and wait , especially related to increasing staff levels and salaries.	Yes	All the constant increases in staff numbers and salary increases. Stop all the constant monitoring without good reason. Could you please show me just what has been done by way of pest management,NOT JUST MONITORING, in our Wanaka area.Thousands of rabbits	Really annoys when I read of all the projects being discussed in all areas except Wanaka and the Upper Clutha. We pay rates to.	Otago Regional Council website
51	John Arnold, Honorary Secretary, Otago Yacht Club	Dunedin	No change - stick with a long term perspective and build capacity in			No		The harbour, as a recreational amenity, is ignored! LoS Request - Harbour amenity	
52	John Hamer	Dunedin	Immediate 'pause' of the LTP programme – results in a reduced or delayed work programme and	No		I expect Council to decide		The council should stop wasting ratepayers money on issues relating to yourselves ie bickering , paying professionals to sort things out etc. A lot of that wasted money could help many projects. Take a step back and think of others as we are not all wealthy like most of you are. Remember you had a huge rate increase last year.	Radio, Newspaper
53	Joshua Rendell	Oamaru	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality	Yes		No		Please carry on as planned in the LTP. The increased cost of fees for Officers working on consents, etc. is regrettable, but understandable. Cost escalations are facing everyone, including the Council. A more equitable 'user pays' approach is appropriate.	
54	Julian Zacco Nieves	Lawrence	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality	Yes		No		Council needs to continue to update the way we do things. More services need to be manageable online. Different approaches to problem solving should be investigated. For example, why is there no program for land owners to acquire or rent traps at a low price for region-wide trapping of pest species?	
55	Julie Park	Oamaru	Immediate 'pause' of the LTP programme – results in a reduced or	No		No		Please keep the increase down. My household and my extended family households are finding expenses very tough	Facebook
56	Karen O Donahoo	Queenstown	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)	Yes		No		Please stick with the long term plan. It is critical that our regional and local councils take a strong leadership role in the areas of biodiversity (pest management) and water quality. In particular, out of control rabbit populations are driving up the cost and detrimentally impacting the success of native reforestation projects (including volunteer led community project, landscape scale projects, and private planting projects). This simply cannot be left to the community to deal with. Without effective predator and rabbit control, ORC cannot deliver on its Biodiversity Strategy and goals. Protection and restoration of our native biodiversity must not be sacrificed for the sake of short term goals or interest - it must remain at the forefront of all planning - for the sake of future generations.	Councillor
57	Kelly O'Keefe	Port Chalmers Dunedin	Immediate 'pause' of the LTP programme – results in a reduced or delayed work programme and reduced rate increase		As a committed environmentalist I have little faith in the ORCs ability or even genuine intention to actually improve the local biome, or genuinely reform beyond greenwashing so the rates rises seem even more ridiculous and cynical to someone who has watched local bodies conspire in environmental degradation for decades. So you need to act like every other functioning adult and accept current financial strictures instead of spending like a meth-head on a bender.	I expect Council to decide		Do your damn jobs and find ways to cut back nonessential spending and deliver value instead of bullying each other. How you are not personally shamed into orbit by your public conduct is something I will never understand; the ORC cannot act like butthurt clowns during publicly reported meetings and then expect to have the mana and public confidence to demand so much of your ratepayers. In the 25 years we've lived here, it's hard to think of an institution that has become more reviled than the ORC from a starting point of relative neutrality; the DCC might trump you for that most-hated brown crown, but not many used to complain so bitterly about the ORC. Congrats! Reform your attitudes to spending, remember that money is coming out of the food budgets of thousands of households, stop trying to pwn each other procedurally because literally nobody cares about your personal feelings on such matters, and do your core environmental work. JFC.	Newspaper
58	kenneth john lawson	oamaru	Immediate 'pause' of the LTP programme – results in a reduced or	No		I expect Council to decide			

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59	Larrie Dustin	Oamaru	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)	Yes		Yes	It should be working diligently on getting water rights sorted, to not allow old gold mining rights to affect the water use now, as these old water rights have NO place in determining what levels of water to maintain natural usage, swimming, and Work to maintain reasonable water levels to promote recreational usage for fishing, swimming and recover the natural flows of rivers, lakes and streams	It is my belief that a higher government agency needs to take over governance of ORC to allow non-partisan representation.	Newspaper
60	Leslie Fallowfield	Dunedin	Watching brief – use the next 6 months to better understand how	No		I expect Council to decide			Radio, Newspaper
61	Loretta Bush	Alexandra	No change - stick with a long term perspective and build capacity in	Yes		Yes	See comment below. Do not decrease anything at all in the work programme	Please do what you said you would do, after extensive public consultation for the LTP. Don't delay on the all the work that urgently needs to be done.	Councillor, Otago Regional Council website, Facebook
62	maggie mcormick	dunedin	Immediate 'pause' of the LTP programme – results in a reduced or	Yes		Yes	doing up george st until they know what is happening with tourists etc	i think they do need back up drivers for buses.	
63	Maic Hodge	Alexandra	Immediate 'pause' of the LTP programme – results in a reduced or delayed work programme and reduced rate increase	No		I expect Council to decide		The public image of the ORC over recent times is appalling and getting worse to the extent that I and many I speak to have lost confidence in the Management and with a few exceptions many of the councillors. This needs to be corrected and a good start would be to scrap the planned rates increase and tell us how you are going to trim costs, live within your means and still provide CORE services. I live in hope!!!!!!!	Newspaper
64	Marcus Simons	Dunedin	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)	Yes		I expect Council to decide		I support the council's approach to the AP. However, by way of a general comment, I seem to have formed an impression that the Council has ongoing internal issues that are bringing unwanted costs, using resources that could be better deployed in delivering the plan. I hope the Council, councillors, and ORC management can improve this aspect of the business, and work maturely and professionally to deliver this vitally important business. Developing a strong culture of staff wellbeing, safety and structured delivery of the LTP goals should be focus. Please keep the public informed when good work is happening or you have made some significant achievements, then we can all celebrate the success.	
65	Matthew Sole	Alexandra	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)					Environmental management is the heart of ORCs work & responsibility Attached - Environmental management is at the heart of Otago Regional Council's work and responsibility. Extracts from Is NZ's economic growth uneconomic? By Jack Santa Barbara https://www.newsroom.co.nz/sustainable-future/is-nz-s-economic-growth-uneconomic	Otago Regional Council website, Online advertising
66	Mrs J M Marshall	Oamaru	Immediate 'pause' of the LTP programme – results in a reduced or	No		I expect Council to decide		Council need to be more professional in all aspects of working together for the good. Too much cost on unnecessary legal redress has resulted.	Newspaper
67	Murray Bond	Dunedin	Immediate 'pause' of the LTP programme – results in a reduced or			I expect Council to decide		Following the tremendous increase last year it is time to start reducing the rate probably negative.	Newspaper
68	Otago Helicopter Trust							Attached - Grateful for the inclusion of the ongoing annual donation of \$350,000 that is budgeted to continue across the ten years covered by the Long-Term Plan.	
69	Otago Peninsula Community Board	Dunedin			I can't comment as a Board Chair	I expect Council to decide		Attached - Presents feedback consistent with the submission to the LTP regarding: - Harbour management Plan - SW filters - Dredging the Eastern Channel - Public Transport service improvements - Biosecurity on the Peninsula - priority to build on the gains	Otago Regional Council website

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70	Percy Alan Jackson	Dunedin	Watching brief – use the next 6 months to better understand how	Yes		I expect Council to decide			
71	Protect Our Winters NZ	Wanaka	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)	Yes	We can't push climate action aside.	I expect Council to decide		There are still no plans for public transport to connect Wanaka and Queenstown. This needs to be added. There also needs to be plans for intraregional public transport connecting Dunedin to Alexandra, Cromwell, Wanaka and Queenstown. Currently the only option is with an expensive and inconvenient private bus. It should be possible to live in towns as large as these and not have to drive to Dunedin. Emissions from transportation are the fastest rising in NZ and vehicle ownership is amongst the highest in the world. This is in part because there is such a poor public transportation network. We need more buses, going to more locations asap. Lastly there needs to be a plan for electrifying public transport/buses.	Councillor
72	PSA							- Resist any campaign for service cuts. - Act now to support effective climate action - Other internal organisation policy matters	
73	Ptolemy James Mortimer-Webster	Dunedin	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)	Yes		No			
74	QLDC Climate Reference Group	Queenstown / Wanaka	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)			Yes	Not reducing any of the climate or biodiversity plan.	Attached - Requests the ORC: - Commits to current deliverables agreed in the 2021-2024 LTP - Establishes a foundation for regional climate action leadership - Commits to greater collaboration with TAs, Iwi and community stakeholders to achieve objectives - Moves from planning and report writing to implementation - Establishes a Climate and Biodiversity Action Plan to oversee projects and action points	Councillor, Otago Regional Council website
75	Queenstown Lakes District Council							QLDC key requests include: -Reverse the LTP decision on Air Quality Implementation -More Public Transport along with escalating fleet replacement (lower carbon) -Increase our BioD & S work (from a Climate Change perspective)	
76	Raechel Laing	Dunedin	Watching brief – use the next 6 months to	No		I expect Council to decide			Newspaper
77	Richard Bowman							Attached - Endorses LTP - endorses progress on Lake Hayes - encourages more work communicating and promoting Wilding Conifer work - encourages continued efforts re Rabbit management and property owner responsibility - supportive of ORC increasing engagement in field	
78	robert cameron	dunedin	Immediate 'pause' of the LTP programme – results in a reduced or delayed work programme and	No		Yes	stop paying consultants on water issues. just make a decision that is for the benefit for a land and not just moaning farmers.	you cant just keep putting rates up year after year. don't you know there is high inflation going on? there is conflict of interest with some of the councillors, like Kelliher	Newspaper
79	Russell Kevin Dowling	Balclutha	Immediate 'pause' of the LTP programme – results in a reduced or delayed work programme and reduced rate increase	No	As the proposed rate increase is excessive and with the current cost of living increase I think the ORC should hold the increase to the rate of inflation as we had an increase of 48% last year.	Yes	The Council should reduce work on climate change and leave that to Government to lead rather than every council in the country doing the same thing over and over. What a waist of money.	Sort out the rabbit problem and stop just talking about it along with the wilding pines. Get the elected members to set the agenda and the Council staff to listen to them and not set their own agenda. If private business operated like the ORC they would go broke in a short time. We pay a lower Clutha flood rate and I have seen very little happen for my money. When you hold an enquiry I would expect the the outcome to have a result NOT another enquiry and the CEO should not be taking the councillors to task in court proceedings and if it happens again the CEO should be dismissed. All else I can say is thanks to The Otago Daily Times to keep us up to date with the childish pathetic goings on in the council.	Otago Regional Council website, Newspaper

Finance Committee Agenda - 1 June 2022 - MATTERS FOR CONSIDERATION

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80	Sergey Ryazanov	Dunedin	Watching brief – use the next 6 months to better understand how NZ and our communities are impacted by current issues and then revisit the LTP programme	No		Yes	Operating expenses: Regional Planning (you planned 1.5 times increase - please reconsider) Regional Leadership Group (Payments to staff and suppliers - 1.5 increase, please reconsider, Environment Group (Payments to staff/suppliers - 2 times increase)	Could you please stick with the inflation rates for operating expenses and a modest increase in services? It means no such increases in the expenses and corresponding rates. Your new measure: "Annual public transport boardings per capita" - you do not specify the rate. Do you have data on how many people use it on a regular basis? If yes, why not to disclose and be more specific on your measures?	
81	Simon Flaherty	Dunedin	Immediate 'pause' of the LTP programme – results in a reduced or delayed work	No		I expect Council to decide			Newspaper
82	Simon Parks - Riverside Run Ltd	Mosgiel	Immediate 'pause' of the LTP programme – results in a reduced or delayed work	No	The ORC needs to hold rates for the lower Taieri flood and drainage scheme until it completes the rating review that it committed to do.	Yes	It should do the rating review of the flood scheme councillors asked it to do.	The ORC knows this is a problem and is just hanging us out to dry by not acting. If the rating mechanism was right, why are you asking central govt for assistance?	Councillor, Otago Regional Council website, Newspaper
83	Southern Lakes Sanctuary	Queenstown	Watching brief – use the next 6 months to better understand how NZ and our					Attached - To encourage ORC to budget for becoming a partner in the SLS project in a manner similar to PF Dunedin so as to allow the SLS to be able to match funding with PF2050 Ltd and increase eradication work in Otago	
84	Springwater Ag Limited	Dunedin	Immediate 'pause' of the LTP programme – results in a reduced or delayed work programme and reduced rate increase	No	The work program cant be funded by the few targeted rate payers on the lower Taieri flood and drainage schemes. An urgent review is required.	Yes	It should stop any significant work on Lower Taieri flood and drainage schemes until a review of the rating basis and performance is conducted	The proposed increase for targeted rates on the lower Taieri flood and drainage schemes is simply not sustainable and is being born by too few rate payers, for the benefit of the wider community. The Council seems to be delaying a review of the basis upon which the targeted rates are levied. The future work program is not sustainable as it simply cant be funded by the targeted rate payers.	Otago Regional Council website
85	Sue Maturin	Dunedin	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)	Yes		Yes	Air quality work. I would support delegating management of Dunedin bus service to DCC. I expect Council to evaluate the resilience of ongoing flood protection schemes in the face of climate change.	I wish for the Council to make haste with water planning and setting ecological flows for our rivers and streams, based on the best available scientific advice.	Newspaper
86	Taieri Trails Trust C/- Colin Brown	Mosgiel	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)			I expect Council to decide		Attached - "Taieri and Clutha flood protection scheme reviews" work should include giving consideration to how the management of the Taieri Floodbanks could be modified to provide for improved recreational access by walkers and cyclists	Otago Regional Council website
87	Terry Wilson	Dunedin	Immediate 'pause' of the LTP programme – results in a reduced or delayed work programme and reduced rate increase	No	Your proposed 18% rates rise comes on top of an expected 48.2% increase for this year and a 48.5% increase for FY2021. This is obscene. With your out of control rates increases you scumbags are causing real harm to the people of Otago. The rate of increase 2017 to 2023 is 20% per year. Find a way to control your spending or bugger off.	Yes	You are wrong to suggest that reducing the work program is the only solution to your out of control rates increases. All departments need to become more efficient - Do the same as you did in 2015 with a third of the money you are proposing to spend in 2023	The problem of your continuing obscenely high rates rises, the ongoing NPAT losses and inadequate renewals capital expenditure are all caused by your out of control spending increases. Control your urges. Stop pretending you need to spend to match regions like Auckland. You lack financial competence and haven't been honest with your Councillors. Please REDUCE the total rates from the proposed \$47.2 million to the 2017 level of \$16.0 million. You managed in 2017, you can manage in 2023.	Facebook
88	The Otago Fish and Game Council	Dunedin				Please see attached submission.		Attached - Supports and implores the ORC to resource adequately. Given the amount of work required in short timeframes, it is clear to Fish and Game that even the level of resourcing envisaged in the Long Term Plan may not be enough. Cutting resourcing from these work streams will risk critical environmental work and simply add to the burden of historic underinvestment, making it more difficult and costly for future generations to tackle the issues.	Otago Regional Council website, Facebook
89	Timothy Alan Catterall	Dunedin	Immediate 'pause' of the LTP programme – results in a reduced or delayed work programme and reduced rate increase	No		Yes	Stop all work projects and work out what is required quired - not spending millions "finding a building forever	Spend others money like water again.....	
90	Tom Campbell	Dunedin	Immediate 'pause' of the LTP programme – results in a reduced or delayed work programme and reduced rate increase	No		Yes	Reduce all increases to zero for next 3 years until inflation is back below 2%	yes - so much waste	Radio

Table of ALL consultation feedback to the Annual Plan 2022-23 process

No	Full name or organisation	Town	Q7. global issues & Council work? - Immediate pause - Watching brief - No Change	Q8. Stick to LTP? -Yes -No	Q8. Comment	Q10. Preference for reducing work? Yes No Expect ORC to decide	Q10. If yes, comment (What work)?	Q11. General comments	How did you hear about this Councillor ORC Website Facebook Radio Newspapers Online Other
91	Tom Clark	Dunedin	No change - stick with a long term perspective and build capacity in	Yes		I expect Council to decide			Newspaper
92	Unions Otago	Dunedin	No change - stick with a long term perspective and build capacity in					Attached - Policy decision on Living Wage to all Council suppliers and contractors	
93	Vaughn Malkin	Dunedin	Watching brief – use the next 6 months to better understand how	No	I am opposed to the scale of rates rises proposed	No		please contract the bus services to folk who will actually provide a service, or not at all!	Newspaper
94	Wayne Berland	Dunedin	Immediate 'pause' of the LTP programme – results in a reduced or	No		No			Otago Regional Council website
95	Whakatipu Wilding Conifer Control Group Inc (WCG)	Queenstown						Attached - That Otago Regional Council continues to support the community-led Whakatipu Wilding Conifer Control Group Inc (WCG) with annual funding from a targeted rate of \$2.02, at a minimum of \$100,000 plus inflation, as outlined in the ORC Annual Plan, to control wilding conifers as described in the Otago RPMP but to also consider further increasing this amount to be more in line with other funding bodies contributions.	
96	Will leith	dunedin	Immediate 'pause' of the LTP programme – results in a reduced or delayed work	No		I expect Council to decide			Otago Regional Council website
97	Wise Response Society Inc	Dunedin	No change - stick with a long term perspective and build capacity in areas agreed (e.g., climate change; quality of our environment; transport)	Yes		Yes	Cut back "Safety and resilience"/flood control and let market decide (Shift focus to attenuating runoff rates by, instead, promoting enhanced soil infiltration and water holding capacity ie ICM programme). Air quality (least of our problems!)	Save more money by giving Dunedin Transport responsibility to the DCC. Offer a flatter pay scale to staff. Shift from adaptation to mitigation of GHG. Take back responsibility for rabbit control and integrate with ICM initiative.	
98	Yellow-eyed Penguin Trust							- Continue to prioritise and fund both ORC work plans and other initiatives (such as Eco Fund) that support biodiversity protection and enhancement in Otago. - Invite community conservation groups to participate in the planned regional biodiversity hui.	

Letters Submitted to the Annual Plan 2022-23
Community Engagement Process
April 2022

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Submission to Otago Regional Council, April 2022
Pest Management Operational Plan – Rabbits

Andrew Harvey

1 Introduction

This submission relates specifically to the (feral) rabbit pest management components of the Otago Regional Pest Management Plan 2019 – 2029; and the consequent Biosecurity Operational Plans.

The strategy and operational plans (collectively, ‘the plan’) call for a landowner-led approach to a sustained control of rabbits. The measure of control is determined to be sustained at below Maclean Level 3 (for the region). The effectiveness of the Operational Plan for any year is assessed according to a set of KPI’s.

The evidence shows that the plan for control of rabbits is:

1. founded on invalid and incorrect bases; and therefore is
2. manifestly unfit for purpose; and furthermore, that the
3. Operational Plan is not being implemented effectively.

My submission is that the plan for control of rabbits be thoroughly reviewed and an appropriate fit-for-purpose plan be developed and implemented accordingly.

2 Bases for the Strategy

It is difficult to determine the bases upon which the plan has been developed, as the documentation I have found and reviewed does not set out options and alternatives that were considered during plan development. The cost-benefit analysis used to inform the plan only explores one approach.

2.1 Basis #1 - Biosecurity Act 1993

On 16th November 2021, at a public meeting held in Moeraki, when I asked about alternative strategies that had been considered when preparing the plan, Manager Environmental Implementation, Andrea Howard, asserted that the Biosecurity Act 1993 prevented regional authorities from raising a rate to effect rabbit control. This viewpoint was endorsed at the same meeting by Cr Andrew Noone.

The implication of this assertion is that a rated model for control was not considered when developing the plan.

The Minister for Biosecurity Hon. Damien O’Connor’s office coordinated a clarification to my query on this point that there is no restriction in the Act to the ability of regional authorities

ability to rate for pest control operations. I have forwarded this advice to Howard & Noone for their information.

As noted in the Southland Regional Pest Management Plan 2019-2029, section 2.2.1 Biosecurity Act 1993 (page 8), “a regional council is not legally obliged to manage pests, but it may choose to do so.”

2.2 Basis #2 – Elimination of ‘Rabbit Board’

It has been asserted that in approximately 1996 the approach of using a Council-owned ‘rabbit board’ be abandoned because landowners could better control rabbits themselves, and at a cheaper cost. It is promoted by ORC officials and councillors that this was a popular initiative.

I can find no evidence that decision for elimination of the board was a democratic process, albeit 1996 was quite some time ago. Local farmers who were here at the time don’t recall a consultation process nor any kind of vote. It does appear that the devolution of responsibility for pest control from a national body to regional councils has been interpreted as ‘rabbit boards are banned’.

It is clear and obvious that removal of the rabbit board model has failed other than for a very small group of large, rural landowners. Overall, the extent of rabbit infestation has only increased. Anecdotally, the current feeling in the community is that elimination of the Rabbit Board was a disaster, should never have happened, and was only the result of political pressure from a small number of powerful and self-interested farmers.

In the intervening 25+ years, it is apparent that the conditions in Otago have changed in relation to land use; but it is also apparent that the status-quo in respect of rabbit control operations has not been reviewed in light of these demographic changes – what might have been appropriate 25 years ago is no longer appropriate.

It is time that the Otago Regional Council recognize and understand that it is not proscribed that that council-led rabbit control is available as an option for consideration.

2.3 Basis #3 - Cost Benefit Analysis

The plan is informed by the Landwaterpeople document ‘Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management: 2015 Analysis of costs and benefits’ October 2018 (the ‘cost/benefit analysis’, ‘the analysis’).

In reviewing this document, it is very evident that the analysis for feral rabbits is deeply flawed.

2.3.1 Commercial agricultural landowner only

The entire analysis is founded on rabbit control operations for commercial agricultural landholders. It seems that the rabbits have not been informed of the need to limit their infestation to this type of land use only.

The costs used in the analysis are limited to rabbit control operations and do not appear to include costs of containment (fencing). ORC is strongly advocating fencing.

The quantitative benefits are limited to stock production; although there are additional unquantified benefits outlined, relating to damage to biodiversity and soils. These unquantified benefits are estimated at 30-40,000 ha, and it is unclear why these benefits aren't taken into account relative to the costs. What type of land this references is unclear but the assumption is that it is commercial agricultural.

The analysis fails to recognize that non-rural and non-commercial landowners don't have the opportunity to offset pest control expenses against revenue in respect of taxation.

In summary, the scope of analysis is limited to commercial agriculture landowners and does not incorporate assessment of the costs or benefits to other types of landowners.

2.3.2 Control Delinquency

The analysis assumes that the number of properties not controlling is 5%. This estimate appears to rely on the anecdotal assumption that the benefits of control make it worthwhile to landowners to control rabbits, and therefore accrue the benefits – however, there is no justification for this assumption.

Even if this rate of delinquency was correct for rural, commercial landowners, such an assumption is nonsense relative to urban or non-commercial landowners.

The 2020-21 Annual Report shows a non-compliance rate of 47% for inspected properties, which is significantly higher than this assumption. The annual report does not describe what type of properties have been inspected.

No sensitivity analysis has been applied to control delinquency rates – this is surprising for a key model metric directly affecting costs and benefits.

2.3.3 Enforcement

The analysis uses an enforcement cost of \$13m, and that enforcement is 100% effective in ensuring compliance and control. There is no breakdown of this figure.

The 20-21 Annual Report discloses that \$20m capital expenditure was expended on the entirety of pest management (up from \$5m in 2019-20, and \$3m and \$5m in the previous two FY's). There is no breakdown of operational expenditure specifically for pest management, but the budget for staff and contractor payments for Environmental for FY 2020/21 is \$13.2m (\$4.7m, \$7m, \$4.9m in the three preceding years). Environment

includes air and water management, harbour management, and environmental enhancement, in addition to pest management.

It is difficult to determine how much of the anticipated FY2020/21 budget is spent on rabbit management, but given the figures above it is a reasonable determination that it is well short of the estimated \$13m annually.

I note that the Decision Report of 25th September 2019 describes a figure of “\$350,000 per annum on rabbit monitoring and inspection”.

2.3.4 Alignment of cost benefit analysis, and the plan

The plan is not aligned with the analysis:

Analysis	Plan
Commercial agricultural only	Scope includes commercial agricultural, semi-rural / lifestyle, urban
Benefits expressed in terms of stock units	No benefit to landowners with no stock
No cost for containment (fencing)	ORC calls for containment / fencing as a key aspect of control
Highly optimistic compliance rate	Demonstrably low compliance rate, and no data for non-commercial
Anticipates benefits will drive behaviour	No articulation of benefits for non-commercial, therefore this driver doesn't apply to that demographic
Incorporates unrealistic cost for compliance / enforcement	ORC is not expending according to the analysis assumptions

It seems clear that the analysis has not informed the plan, if it had the plan would be specific to large agricultural landowners only. Indeed, relative to feral rabbits, the same outcomes would be accruing to the region if the analysis had not been undertaken.

If the analysis for other pests is similarly flawed, and if plans for those pests are similarly mis-aligned with the analysis, then it seems to me to have been a waste of ratepayers money to undertake this piece of work, albeit it is a requirement of the Act.

3 Implementation of the plan

3.1 Issue – One-size approach

The plan calls for a landowner-executed control model, with ORC providing guidance, support, coordination and if needed, enforcement.

In promoting the plan, ORC relies on third-party consultants who advocate a community-based approach, strongly encourage a containment (fencing) component, and collective collaboration across neighbouring properties.

The basis for issuing notices is, self-admittedly by ORC, pursuant to a daytime assessment of rabbit numbers according to a rural-only model and tools.

Here are the issues with this approach:

- fails to recognize a mixture of property uses (rural large, lifestyle medium, urban small, public agency)
- fails to understand demographic population variation (rural professional, lifestyle, urban, retired people on fixed incomes, retired 'wealthy', itinerant/part-time residency, land-bankers)
- fails to recognize that fencing is disproportionately costly for most properties in rabbit-prone areas in Otago
- the third-party consultants are obviously not rabbit experts, and accordingly do not appear to understand rabbit control
- guidance from ORC is poor: the Moeraki website, for example, has not been updated since 17th November 2021
- coordination by ORC is poor, it seems to be a 'pull' model rather than a 'push' model. In other words it's up to the landowner to request information rather than receiving a proactive push of information. There are no resources compiled and made available to landowners, instead these have to be requested (and typically, not made available due to 'privacy' reasons). Coordination of public agencies and Kiwirail appears to be non-existent. In spite of signing up to "...rabbits-signup", there have been no updates provided through that channel.
- fails to recognize that landowners have other things to do and therefore time spent dealing with neighbours and public agencies is inefficient for those contact points, having to deal with multiple landowners, and time-consuming for the landowner. Whereas it's ORC's job to manage the environment.

All of this means that the landowner-led model relies on equal performance from all landowners. Large single professional landowners have a relatively low level of complexity in respect of pest management – they only have to deal with themselves. Smaller landowners having to deal with multiple discordant neighbours has a significant complexity component to it, disproportionate to the overall outcome.

The public agencies have to deal with multiple small neighbours – all looking for the same responses, but relative to their specific situation. This is also inefficient, albeit these agencies only job is to deal with their stakeholders.

In summary, the plan is oriented to the simple use-case of the large commercial rural landowner, with low complexity in terms of neighbouring properties; yet ORC applies this same model to the smaller landowner with much more complex neighbourhood issues to resolve.

3.2 Issue – ORC performance to date

It is clear that ORC's delivery to plan has fallen well short of delivering an effective outcome for ratepayers. The reasons for this are:

- expenditure to date is significantly below the cost/benefit analysis expectations
- use of third-party consultants to execute the plan is ineffective
- the plan itself is flawed as it does not recognize the complexity of rabbit control when management of the plan is disconnected and arbitrary.

It appears to the public that ORC is slavishly following a demonstrably flawed plan, and is not listening to community feedback regarding these deficiencies. As a result the effectiveness of rabbit control measure is low, and progress is slow.

It is also evident that there is a disconnect between ORC management and councillors, and ORC field staff. It does appear that field staff, who have rabbit management expertise, are not being listened to by management, who do not.

This disfunction is of concern.

3.3 Issue – Hearing Panel

Appendix 2 Hearing Panel contains a number of statements relating to rabbit control:

- the cost/benefit analysis did not consider costs for containment strategies
- there is a national approach to rabbit control and the Otago approach is consistent with that of neighbouring councils and nationwide
- the panel notes the submission from Federated Farmers that the council 'has not done enough to control rabbits' and 'seek a coordinated and collaborative approach for rabbit control'
- the panel notes the submission of Diana Noonan and others regarding the escalation of rabbit populations
- perpetuates the myth that the removal of Pest Destruction Boards in 1996 means that Otago Regional Council is prevented from undertaking the execution of pest control
- considers that a passive website outlining control methods is sufficient to effect ORC's plan

Overall, it appears that, in spite of the submissions relative to feral rabbits, the panel has not applied a critical assessment of the plan, instead focusing on narrow technical points for decision-making whilst accepting the basic premise of a landowner-led model for control.

3.4 Issue – Legal measures

ORC advise that landowners may be subject to a "Notice of Direction under section 128 of the Biosecurity Act".

I have obtained legal advice that landowners may have a defence to such a Notice of Direction, should one be issued.

Of course, it does depend on what basis a notice has been issued; but my advice is that a defence exists if the plan is unreasonable in respect of the affected landowner. My advice is that, considering the preceding comments in this submission, the plan may well be considered unreasonable for most landowners.

Please note that I have provided a precis of the advice, and not the advice itself.

If, in some circumstances, landowners are able to successfully defend a Notice of Direction, then that weakens the ability of ORC to successfully implement the plan.

4 My Submission

Most residents in rabbit-prone areas are enthusiastic about control, and are more than willing to contribute. However, most residents are frustrated as to ORC's approach, and are not willing to contribute wastefully.

I submit that the plan relative to feral rabbit control is inappropriate and not fit for purpose:

- a) all options for establishing the plan that should have been considered have not been considered, in error, and accordingly the plan is not founded on the correct bases;
- b) the plan is too simplistic for the diverse land use and ratepayer demographic of rabbit-prone areas of Otago;
- c) expenditure for control measures has not occurred to the expectation of the existing plan, and the ORC performance in managing the plan is poor.

I propose that a formal, robust review of the plan for rabbit control be undertaken, and a fit-for-purpose plan, considering all possible options, be formulated and implemented.



**Arrowtown Promotion and Business Association
ORC LTP Submission 2022-23**

The Arrowtown Promotion and Business Association (APBA) is a non-profit community organisation of commercial ratepayers and business operators covering the Arrowtown Ward (350+) The Board has representatives from these groups and the Arrowtown Ward QLDC representative.

The APBA activities cover the commercial area of Arrowtown and the Arrowtown ward catchment area. The Association employs a manager to support all the activity they undertake annually. The APBA represents a wide and cross section of the business community in Arrowtown as well as works closely with the Arrowtown Village Association (AVA) who represent many of the same views, particularly around air quality and transport, of the 4500 resident population they represent.

We do wish to acknowledge and thank Otago Regional Council (ORC) for the support and initiatives to date.

The APBA are in support of the ORC Annual Plan 2022-23 and we are also supportive of the LTP 18% rate increase to allow for these vital projects to continue. We wish to draw your attention to three key areas on the current LTP.

Environmental - Air Quality

The APBA wishes to see the ORC bring forward the air regional plan on the LTP as this is an area of utmost concern to our visitors and business community, as we head into the winter months. We would like to see further investment to ensure this is delivered within the next 2 years and not delayed further.

We also seek for ORC to increase the funding to allow for enforcement and compliance immediately (FY22-23) to avoid any further health concerns to our residents and visitors due to the air quality frequently exceeding the safe daily average (50 micrograms per cubic metre), in part due to the heavy use of solid fuel burners in Arrowtown.

Environmental - Water (Quality)

The APBA seeks to request that the LTPs current commitment to Lake Hayes water catchment and ecology recovery is upheld and maintained to allow for this vital work to continue.

APBA ORC LTP Submission 2022

The APBA is supportive of the Water Quality Plan but also wishes for the outflow of the Arrow river is be better managed. We would not like to see additional private users be able to take further water supply, due to the adverse health to the ecology of the water should this take place, resulting in the river not being able to be enjoyed for recreational purposes or enjoyed by our visitors to swim and gold pan in summer months.

Safety and Resilience

Over the last 2 years ORC have undertaken repair and maintenance of the Arrow River flood berm. This work is appreciated and due to seasonal heavy flows and recreational activities, is in regular need maintenance and repair.

This work has extended to improving water flow in the Bush Creek catchment, removal of thickets of seeded willow, weeds and log jams which exasperates flooding, damages walking tracks and creates standing pools of water.

The APBA has recently undertaking riparian plantings to help support and maintain the recent clearing works, as well as improve access and amenity value for locals and tourists.

This area has not traditional been on a maintenance schedule but would benefit from continued seasonal support as community initiatives continue to support the healthy regeneration of this area.

Transport

APBA seeks additional infrastructure for transport within the Queenstown community be brought forward to Y3-4, from where it sits at Y7-8 in the LTP, which is in line with supporting our commitment to ensuring at least 20% of the Wakatipu basin is utilizing active transport within 6 years, which is counter-intuitive if we do not have additional infrastructure in place to allow for this.

In particular, we again request for an additional direct service from Arrowtown to Queenstown via Malaghans road at peak hours, in the first instance, understanding the shift hours that many QLDC residents work. We seek an additional service for this, as we do not wish to see this at the detriment of other public transport services in the Wakatipu basin, which we understand are already running at bare minimums. We (APBA) will work with ORC and other stakeholders (e/g AVA) to support this to run at capacity, or near capacity within 6-12 months.

In summary, our submission focuses on :

1. Request for the "Air Quality Plan" in the LTP to be brought forward and ensure the funding, or an increase in funding through our rate base, is established to address Arrowtown's air quality as a matter of urgency.
2. Enforcement and compliance around Arrowtown solid fuel burners and use of coal, in particular, to mitigate and manage the air quality.
3. Request for an additional direct service from Arrowtown to Queenstown via Malagans road at peak hours.
4. Managing the outflow of Arrow river with preference for no additional water being taken for private consumption at the determinant of the health of the water.
5. LTP current commitment to Lake Hayes water catchment and ecology recovery is upheld and maintained.
6. Supportive of the 18% rate increase and further increases over the life of the LTP to allow and support the above projects to take place.

APBA ORC LTP Submission 2022

We would like to speak to our submission at the hearing, in relation to this matter.

APBA Board Members: Jimmy Sygrove (Chairperson), Bruce Gibbs (Treasurer), Nicky Busst (Manager), David Clarke, Scott Julian, Sam Lycock, Vicky Arnold, Benje Patterson, Jeanie Crawford, Nick Fifield, Ross McClean, Lily Barnes and Shelley Rhodes. Heath Copland sits on our board in a non-voting capacity, as the QLDC councillor for Arrowtown.

Arrowtown Promotion & Business Association
c/o 49 Buckingham Street, Arrowtown 9302
www.arrowtown.com

Arrowtown Village Association
Submission to Otago Regional Council Annual Plan
May 2022

Introduction

The Arrowtown Village Association (AVA) is a volunteer-run incorporated society that works in an energetic, co-operative and organised way for the benefit of the village of Arrowtown. The AVA is a recognised community association by the Queenstown Lakes District Council and is the appointed guardian of the Shaping Our Future Arrowtown (SOF) 2017 report. SOF is the most recent visioning document for the future in Arrowtown compiled following intensive community consultation.

The AVA firstly would like to thank the ORC for their ongoing work and contribution to the Otago region in particular Arrowtown and the surrounding Wakatipu and Upper Clutha districts. We understand the past 12 months have been challenging for individuals, business, local and national government alike.

Our submission to the LTP 2021-31 requests the consideration of the following issues that are important to the AVA members, being the residents of Arrowtown:

Air Quality

Direct SOF statements relevant to our submission include:

- Arrowtown is a vibrant, diverse community that is pro-active in managing its future in a way that values and sustainably protects its heritage, character, lifestyle and the natural environment.
- Environment vision: Arrowtown's natural environment is valued as a foundation of community well-being. We actively care for our town's drinking water, **clean air**, native flora/fauna, natural and heritage landscapes, town greenspaces, and we accept the shared responsibility to ensure these are sustained and enriched.
- Future air quality standards are achieved and exceeded.

The AVA has participated actively with ORC, NIWA and other community groups in their efforts to improve the poor winter air quality in Arrowtown, which is being caused mostly by particulate emissions from domestic log burners. The out-door air quality on certain days in Arrowtown during the winter months measures the poorest in Australasia. There has been no improvement in air quality in 10 years and last year the draft NESAQ 24-hour average PM2.5 level was exceeded on over 70 days compared with a permissible 3 days. The trends are shown clearly in the graph on the following page.

The AVA is deeply concerned that ORC intends no activities on air pollution other than monitoring air quality and the efficiency of ULEB's until 2023-24, and no funding is earmarked for air quality improvement initiatives. Reality would see no solutions being offered until after 2025.



Data for this graph has been extracted from the LAWA website and from detailed daily PM10 and temperature records provided by ORC based on monitoring at Arrowtown School until 2015 and at the reserve near Norfolk St from 2015.

AVA request air quality measures by the ORC in the Annual Plan include:

- Continuing and enhancing air monitoring both outdoors and indoors as per NIWA research.
- Investigate the conducting of trials on a small number of homes with Oeko Tubes www.envirosolve.co.nz to assess feasibility for inclusion in the future air quality strategy.
- Revisiting funding for air quality education programmes and best practice heating solutions, and enforcement of fines for repeated offenders.
- Work with local Health Authorities to identify and quantify respiratory issues caused by air pollution and the lack of adequate home heating. There is currently insufficient research data for Arrowtown to be definitive on the impact of poor air quality on the health of the inhabitants. *Until this is made public there is likely to be continued resistance from the community to make any changes in heating preferences and the actual effect of wood-burners will be unknown.* This work would be helpful for when the air quality strategy is being compiled.
- Implementing a roadmap to achieving clean reliable heating alternatives in a reasonable timeframe. This can be done in collaboration with the residents of Arrowtown who are passionate about improving the air quality where we live and improving our quality of life. We believe that this needs to begin now – it cannot wait until 2023.

PUBLIC TRANSPORT

Direct SOF statements relevant to our submission include:

- Community Key Objective: A regular cost-effective public transport system that enables easy access between Arrowtown and other districts in the region

The AVA appreciates ORC's provision of the highly subsidised public transport bus service for Queenstown and surrounding areas including Arrowtown. We are also appreciative of the newly informed route catering for Arrowtown primary school students to Five Mile.

We do, however, believe there is more that can be done to improve the public transport network that services Arrowtown and the greater Queenstown area.

AVA request for inclusion in the Annual Plan for public transport measures by the ORC include:

- Increased funding and initiatives to encourage a modal shift and step change to improve usage of the public transport network including education on the benefits of a highly utilised public transport network (environmental, economic, social)
- Expansion of the current public transport networks to include:
 - A feasibility study on a direct bus service via Malaghan's Road from Arrowtown to Arthur's Point - the current circuitous route is deemed too long for direct work purposes, perhaps leading to a smaller purpose bus at peak times
 - Later services to be introduced on weekend evenings to encourage residents and visitors to enjoy Arrowtown's restaurants, bars and other entertainment options

ARROW RIVER FLOW RATES

AVA supports ORC setting and maintaining appropriate flow rates for the Arrow River to ensure the ongoing quality of water, and a thriving natural environment. The flow rates should ensure that any authorized takes of that water do not negatively impact the downstream environment.

The AVA respectfully requests that the issues raised in this submission are considered in the Annual Plan as it is finalised. We would welcome the opportunity to speak to our submission.

Susan Rowley

Chairperson

Arrowtown Village Association

May 2022

Otago Regional Council 2022-2023 Annual Plan

Submission from Brian Dixon¹

Last year, I presented by submission and in person at the Long-Term Plan hearings and commended the council “for prioritising its **climate change response** in (the LTP) and recognising that the Council needs to “consider climate change in everything we do”.

I stated then that:

The ORC should be seeking support from central government to put in place its own comprehensive climate action strategies, sufficient to meet the climate mitigation (emissions reduction) targets of the government and the City of Dunedin where most of the ORC’s ratepayers live. It will also be useful for the ORC to engage in partnerships with other regional councils who have formulated relatively advanced climate action plans (eg the Waikato Regional Council’s pathways approach).

In the 2022-23 Proposed Annual Plan, I see little evidence that the ORC is making any real effort to meet the commitment expressed in the LTP in respect to climate change, certainly not considering it in “everything” the Council does.

Having been talking with councillors and council staff in several regions and districts/cities over the past two years, I see others making efforts to seriously address the issues and engage with their communities in a meaningful way. Sadly, that is not in evidence in Otago and the targets in the current Plan show it is anything but a priority with essential steps that should already have been done extended over the next three years and beyond.

Air quality

In my submission on the LTP last year, I said that “deferring action on air quality issues for two years as proposed in (the) Plan is, in my view, negligent. That is not consistent with the commitment to climate action and the Council must reconsider this position and recognise its responsibility to improve on what it admits is a failure to achieve the NZ air quality standards. Improvement needs to be a priority.”

¹ I am a Dunedin-based ORC rate-payer and a clinical psychologist. My specialist interest in climate matters is as the New Zealand representative in an international network of psychology leaders committed to applying psychology to help address climate problems. I also co-chair the NZ Psychological Society’s Climate Psychology Task Force.

LOS: Provide a robust and integrated environmental planning framework for Otago’s air resource.				
Performance measure			Targets	
2021/22		2022/23	2023/24	2024-2031
Complete review of the Regional Plan – Air.	no target (programme commences Yr2)	Issues and options papers developed by 30 June	Community engagement for development of Regional Plan - Air completed by 30 June	Regional Plan - Air notified by 30 June 2025

However, the ORC persists with a laissez-faire approach to Air quality, with unambitious targets and a “hands-off” position on monitoring and management of air pollution. Tougher rules are needed as soon as those can be put in place and waiting until after 2025 to have a new Air management plan in place is ridiculous given what we now know about the limited time we have to act on the climate emergency.

Public complaints about air quality have increased over past years here and around New Zealand but people also comment on the lack of action by many Councils. I have personally reported major instances of air pollution from farm burn-offs on a number of occasions but have seldom received any follow-up and when I have, that usually consists of a standard claim that household fires are the main source of air pollution. That may be true for our city and towns but we lack data on rural emissions to generalise the claim and in any case, there is no excuse for gross breaches of the National Standards with visible pollution in Dunedin and Otago towns, often for days, because of rural fires.

LOS: Develop and implement partnerships and programmes to reduce harmful emissions and support clean heating, warm homes and clean air.				
Performance measure			Targets	
2021/22		2022/23	2023/24	2024-2031
Clean heat, clean air implementation programme has a high level of local engagement in targeted air sheds.	no target (programme commences Yr 3)	no target (programme commences Yr 3)	Establish engagement levels in all targeted air sheds	Engagement levels improve in all targeted air sheds

There needs to be considerably more urgency on this objective. Reduction of harmful emissions needs to be included in a programme that is rolled out from this June and progressively implemented in scale around the entire region.

Where farming and forestry activities are persisting with burn-offs, there is no accountability for this source of carbon load on the atmosphere that is recognised internationally as a significant contribution to GHGs (and banned outright in Europe). The absence of teeth in the ORC’s LTP, annual plans and the 2021 Proposed Otago Regional Policy Statement makes our

regional council complicit in this offending. No emission records are kept on rural carbon emissions and the Council must remedy this as a matter of urgency. Not doing so is abrogating an important responsibility. Putting Air Quality programme improvements on hold for two years is a serious failure in the ORC’s duty. Furthermore, the Council Proposed Annual Plan aims to document GHG’s under its climate change objectives, yet is not even able to present data on a significant contributor to GHG’s in our region.

Also unethical as an international crisis deepens, is the ORC’s failure to act on **methane emissions**, identified as a more potent GHG than carbon and a major driver of increasing global temperatures². The ORC needs to be preparing to act on methane and must begin working with AgResearch, the farming community, the Iwi and with local bodies with sewerage and landfill sources of methane to reduce, neutralise and capture emissions. This will require improved monitoring systems and attention to spot discharges and tougher enforcement of standards.

Climate change plans

There have been stark warnings that there is no more time to further delay decisive action to control emissions and, with the substantial new costs that regional councils can expect with responsibilities for climate change mitigation, the ORC must approach central government for funding to implement mitigation and adaptation measures required to meet government targets.

Collect and make publicly available accurate, relevant and timely information on climate change in Otago.				
Performance measure			Targets	
2021/22		2022/23	2023/24	2024-2031
Information on climate change in Otago is shared with the community and stakeholders.	no target	Regional GHG* inventory completed and reported to Council by 30 June	no target	Regional GHG inventory completed reported to Council by 30 June 2024 OCCRA** completed and reported to Council by 31 Dec 2026

On this objective, the ORC (and the planet) does not have the luxury to continue to have “no target” identified in years of its Annual Plan. Furthermore, the targets do NOT relate to the objective. Providing reports to the Council is not the same as effective engagement and communication with the “public” which requires the ORC to develop strategies and explore

² <https://www.independent.co.uk/climate-change/news/methane-emissions-global-temperatures-b1843170.html?s=09>

methods for sharing information so that communities are empowered to take appropriate action in response to climate change.

Lead a regional approach to climate change in partnership with local councils and iwi.				
Performance measure			Targets	
2021/22		2022/23	2023/24	2024-2031
Report on regional stakeholder engagement and collaboration on climate change	No target (programme commences Yr2)	Complete an annual report on regional climate change collaboration and report to Council	Complete an annual report on regional climate change collaboration and report to Council	Regional partnership priorities and approach defined, formalised and reported to Council by 30 June 2025. 2025-2031: Regional partnership approach implemented

Again, reporting to Council annually is not a useful performance measure or target in establishing partnerships for climate change responding. Regional partnerships are a means or process to achieve something else.. such as effective regional, local and community responses with clear mitigation and adaptation plans and resources to implement those. The ORC will need to take advice on these interventions.

At the hearings in 2022, I offered assistance and advice on approaches to communication with ratepayers regarding climate issues and motivation for effective community actions to mitigation and adaptation. However, only one regional councillor has taken up that offer. Accordingly, we are talking with councillors elsewhere in New Zealand about programmes that could attract government funding. Most of those councils are considerably ahead of the ORC with greater levels of commitment from elected representatives and interest from staff in initiatives and implementation.

On the following page, I offer a list of suggested programmes and projects in which I think regional government needs to be involved, supporting or promoting. I would be happy to discuss these in greater detail with Councillors and/or Council staff.

Suggested integrated transition projects

The Otago regional council with Iwi, local councils, central government, NZTA, DOC, NIWA, AgResearch and others with expertise and resources as appropriate could be initiating and developing the following:

Climate action

- Increasing readiness for adverse events
- embarking on collaborative schemes for energy conservation and energy savings
- promoting renewable energy programmes for vehicles, public transport and more efficient movement of goods within the region and between regions
- providing subsidies and loans for the community to implement savings through wind, solar and energy efficiency measures (eg funding support for sustainable homes, installing insulation, double glazing etc)
- protecting the coastline from erosion and encroachment
- Planting trees, estuarine and wetland plants,
- Raising coastal road levels
- Improving air quality (monitoring emissions and enforcing standards)
- Installing water storage and implementing water conservation measures
- Supporting research and measures to significantly reduce methane emissions

Community Wellbeing and prosperity projects

The ORC should be working with Iwi, central government, local government, university and appropriate industries to enhance the social environment and opportunities:

- Leading community consultation and collaboration in the development of effective plans for mitigation of climate change and adaptation to its effect.
- Providing support for social services and intervention
- Applying government support to housing for those needing low-rent alternatives
- Provide rates relief for positive ventures
- Preventing and avoiding destructive ventures (eg minerals extraction) and the threat that poses to water and soil quality and community wellbeing
- Preparing for and encouraging NZ's internal tourism – better public transport services (road, air and sea) into and around the region; less expensive activities (eg wildlife/nature charters, guided walks, scenic flights, short tours)
- Provide support for a wide range of events (concerts, festivals, shows, conferences, sports)
- Promoting and supporting communities' special features (eg crafts, local produce, adventure tourism, cultural events, recreational pursuits in centres)



Have your say on our proposed Annual Plan 2022-23

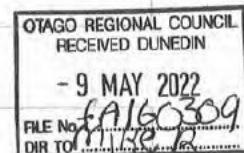
All feedback is made available for public inspection. Note that names and feedback are included on papers available to the public and media. They can also be made public as part of Council's decision-making process (we will not make your phone or email details public).

Full name or your organisation's name

Bryan Ritchie Keane

Suburb

Mornington



Town/city (or nearest town/city)

Dunedin

Phone number

[Redacted]

Email

[Redacted]

Share your feedback with us regarding the proposed Annual Plan 2022-23

How do you think Council should react to the current global issues with regard to 2022-2023 work programme?

(Choose any one option)

- No change - stick with a long term perspective and build capacity in areas agreed (e.g. climate change; quality of our environment; transport)
- Immediate 'pause' of the LTP programme - results in a reduced or delayed work programme and reduced rate increase
- Watching brief - use the next 6 months to better understand how NZ and our communities are impacted by current issues and then revisit the LTP programme

Have your say on our proposed Annual Plan 2022-23

YourSay | Otago Regional Council

Do you think Council should stick to its Long-term Plan that increased the scale of work over years 1 to 3?

You can select yes or no, along with also selecting 'Make a comment' if you wish.

- Yes
 No
 Make a comment

when will rates get below 12% or is that my dream

What is the impact of the Otago Regional Council rate to your yearly household spend or business/commercial operation?*

*For this question the names of submitters will not be reported publicly; names will remain confidential. Feedback and comments will be available to the public but not the associated name(s).

- Little to no impact
 Modest - aware of the expenditure item but is absorbed
 Significant - need to carefully balance other spend items in order to pay the rate bill
 Make a comment

2021 rates \$342 up \$100 from 2020 [2022 18% up and 2023 12% increase

If Council was to reduce its work programme do you have strong preference for what that might be?

I am 70 old live alone big increases for me

(Choose any number)

- Yes
 No
 I expect Council to decide

Answer this question only if you have chosen Yes for If Council was to reduce its work programme do you have strong preference for what that might be?

What is your preference in what should the Council reduce regarding its work programme? What area of work should the Council reduce?

Reduce excess spend on bike lanes, wilding pines, public buses why not help drivers for change all stops to be safe for passengers this has been asked for years "would not cost much" to alter.

Do you have any general comments about the proposed Annual Plan 2022-23?

seems to me the O.R.C. spend more time with in house fighting with your staff (this also happens in D.C.C. its all little power plays and egoes) as I have talked to councillors in both organizations. Set on with your jobs as your paid well over the M.M.M. wage and annual rates increase with no noticeable benefits for us who are hammered with massive annual increases - WHY.

Optional information

This is kept confidential for analysis only.

Which age range are you in?

(Choose any one option)

- <25 years old
 25-34
 35-44
 45-54
 55-64
 65+
 now 70+ 4 months

Have your say on our proposed Annual Plan 2022-23

YourSay | Otago Regional Council

Tell us how did you hear about the Annual Plan feedback process?
Select as many as apply.

- Councillor
- Otago Regional Council website
- Facebook
- Radio
- Newspaper
- Online advertising
- Other (please specify)

Answer this question only if you have chosen **Online advertising** for Tell us how did you hear about this.

Where did you see the online advertising?

dont use online I speak face to face with your councillors (and DCC also)
and its not pretty what happens ~~at~~ behind your glass boardroom
doors or get govt to install their directors to run O.R.C./D.C.C
as they should be without bleeding public !!!

B R Deane



Otago Regional Council - Annual Plan 2022/23

SUMMARY

Business South Inc welcomes the opportunity to provide a submission on Otago Regional Council's Annual Plan 2022/23. We are pleased to make a submission on behalf of over 1,300 members in the Otago region.

We consistently work to ensure the business community has a voice in local government and would like to create a positive working relationship with the Council in several projects that will build on and sustainably grow the Otago economy, albeit in unprecedented times.

We see ourselves as a collaborative partner within the Otago region from the perspective of maintaining open and transparent communication and engagement with the business sector.

Business South Inc has been formed by the recent merger of the Otago Southland Employers Association and the Otago Chamber of Commerce. We are well connected and well-resourced through these organisations and our shareholding in BusinessNZ (see **Appendix 1**). These provide centuries of combined wisdom with access to some of the best policy minds influencing and shaping the future of our nation and is ambitious on behalf of the business community to work with Council on its planning whilst ensuring the business voice is loud, collaborative, influential and heard.

Making the region attractive by having a business-friendly brand is vital for future investment.

We have questions of Council:

1. **What is the Council doing to support small to medium (SMEs) and start-up businesses**

From Business South Inc's perspective we see the Council having a responsibility to support SMEs, particularly because several areas do impact our business community, such as: the role of the Regional Policy Statement which underpins the planning framework for the management of natural and physical resources in Otago, regional wellbeing indicators, urban development strategy, and resource management reforms.

This submission is aligned to those submitted for the Dunedin City Council and Waitaki District Council 2022/23 annual plan process, whom we also believe have responsibility for supporting the Otago business community. Note: Clutha District Council's consultation period is still open and Central Otago District Council consult every two years and did not seek submissions for 2022/23.

2. **What is happening with the Regional Transport Plan?** Business South Inc would like to see forward thinking sustainable investment across the region, in particular growth areas, where connectivity between localities is increasing. For example, there are people who would be happy to commute from places like Palmerston and Waihola to Dunedin, and there are employers and employees who regularly travel within the Central Otago and Queenstown Lakes districts for work.



3. **Otago Regional Economic Development Plan** - the plan needs updating for sustainability, Centre of Digital Excellence, infrastructure opportunities, industries, and achievement of the targets. The partners such as Business South Inc and the Otago Polytechnic have also changed, and the updated plan needs to reflect this.
4. **What is happening with the Manuherekia River flow decision?** Members in the district would like transparent conversations and actions. Are there specific forums for members to engage in? We would encourage a broader and balanced discourse with water which includes the immediate economic impacts on water users and then the 'flow on' impacts into the broader economy.
5. **What is happening with planning and consenting** and to support creative options for **housing** given the recruitment challenges currently being faced by many employers in the region. Business South Inc is working collaboratively with other groups including to find solutions.

KEY ISSUES

There is no 'one view' of issues with a business lense, as business owners come with diverse ranges of life-skills, life cycles, skill sets, innovations (both technological, sustainably and a change mindset) making significant contributions to the business and wider community both locally, nationally, and internationally. We do, however, bring together a cross-section of perspectives to collaborate with Council and bring about real positive change for Otago.

SMEs nationally are 97% of the NZ business landscape, the numbers are similar for our regional membership. Small businesses and local entrepreneurs and those that support them are the 'backbone of our economy'. They are the ones growing local jobs, providing stable employment, developing, and strengthening community resilience and fostering opportunity.

Business South Inc's strategic vision is to have a thriving business environment that benefits the whole region, thereby ensuring economic growth is achieved in balance with building cohesive communities. One of our key pillars is to ensure that local government are constructive partners in developing vibrant and sustainable local economies.

While the range of concerns expressed by our business community are varied and often reflect local circumstances, there are several common themes. These are: the challenge around funding, the regulatory and compliance cost burdens, infrastructure requirements, accountability, capacity, and the increase in the range of issues within local government's scope.



A. IMPACTS FOR BUSINESSES

1. **Rates increase** – The proposed increases are unsustainable for businesses.

We note the Annual Plan 2022-23 planned programme of work is largely unchanged from the Long Term Plan 2021-31. The proposed rates increases are significant for commercial operations, farms, and businesses generally.

It must be said that the timing of rates rises, as businesses are recovering from Covid-19 is not the best. It is poor timing to introduce rates rises for employers and employees at a time when cost pressures on businesses are extremely tough with businesses recovering from the impact of Covid. The pandemic has cost the country and individuals a great deal. Cost increases have not been matched by increases in revenue. There are members who cannot see the benefit of rate rises under current economic conditions.

Business South Inc would like the Council to reduce any rates increases.

2. **Regional Planning programme** – Business South Inc would like to collaborate in key projects where there are direct impacts for businesses and we can make a positive contribution, including the:
 - a. Urban Development Strategy
 - b. Regional Policy Statement
 - c. Otago regional wellbeing
 - d. Climate change initiatives
 - e. Resource Management Act reforms

B. FUTURE PLANS FOR THE OTAGO REGION

There should be provision for businesses to readily engage with Council to co-create projects that are future-focused aiming to attract investment and sustainable business growth in the district, and wider region. The purpose is to make the Otago region an outstanding, cost effective and compelling place to do business. There is no one answer on how to do this.

We encourage positive collaborative action with Council on the following initiatives:

1. **Sustainability** – Business South Inc will drive social, environmental, and financial sustainability as an organisation as well as supporting the businesses of Otago and Southland to embrace sustainable business practices. Collaborating with Council on sustainable projects will be beneficial to our community. BusinessNZ see this as a critical area of focus from a national perspective.
2. **Strengthening Māori and Pasifika business community** – Business South Inc is building long-term partnerships to foster and grow the creative and diverse business communities. We would like the Council to support cultural diversity in the business sector.



On behalf of our members, thank you for considering this submission.

CONTACT FOR FURTHER INFORMATION

For further information, contact the Chief Executive Officer, Mike Collins, 03 479 0181.



APPENDIX 1. ABOUT BUSINESS SOUTH INC

Business South Incorporated - Otago Chamber and Southern Employers is a membership-based service organisation. The Chamber and Southern Employers together have a combined history of nearly 300 years' worth of business support, expertise, and representation in the region. The Otago Chamber of Commerce¹ was founded in 1861 and the Otago Southland Employers' Association was founded in 1890.

Comprised of over 1,300 members, Business South Inc actively provides information, advocacy, and support for business:

- connecting members through networking events and functions
- advocacy
- business support
- employment relations
- health and safety
- workforce development
- developing capability and skills through our training workshops and programmes, including the not-for-profit sector.

We also advocate and offer a voice for business concerns and submit on behalf of members on local and national government policy. We represent a broad cross-section of business demographics including, location and industry type, with a full range from small businesses through to large employers and stakeholders in the Otago and Southland region.

We are a member of both the national BusinessNZ and NZ Chamber of Commerce networks.

¹ Business South Inc excludes the chamber organisations in the Queenstown Lakes District – Queenstown Chamber of Commerce and Ignite Wanaka.



3 May 2022

**Chief Executive
Otago Regional Council
Dunedin**

Re: Submission to proposed Annual Plan 2022-23

Central Otago Wilding Conifer Control Group (CWG) is a community based group concerned with controlling the spread of wilding conifers within Central Otago district. CWG oversees the National Wilding Conifer Control programme within Central Otago district and is active in promoting awareness of the threat of the spread of conifers amongst landowners and the general public.

CWG acknowledges the financial support of \$100,000 annually provided to CWG by ORC in the past and supports the creation of the Otago Wilding Conifer Co-ordination Group chaired by Alexia Forbes as a positive development in controlling wildings within Otago.

Submission:

CWG supports the 38% increase in rates funding for Biosecurity.

The areas within the specific area of wilding conifer control we would like to see the ORC concentrate on next year are as follows:

- Complete a survey to identify all infestations of wilding conifers within Management Units not already covered.
- Complete a survey of Pinus contorta shelterbelts.
- Develop a strategy for getting landowners to remove P. contorta shelterbelts.
- Develop a strategy with other stakeholders (CWG, LINZ, Federated Farmers) on how to deal with non-participating landowners who have a significant area of wildings on their property.
- Improve knowledge amongst landowners of the Otago Regional Pest Management Plan.
- Work to integrate wilding conifers as a control pest into all Environmental Farm Plans.

We look forward to working closely with ORC staff in controlling wilding conifers within Central Otago.

Yours sincerely

Phil Murray
For Chairman
Central Otago Wilding Conifer Control group

**Coastal Communities Cycle Connection Submission to the Otago Regional Council
Annual Plan 2022-23**

I write in support of the submission made by Dunedin Tracks Network Trust and their request for \$80,000 per annum funding for a trail manager to progress our Coastal Communities Connection project and the Mosgiel Trail.

In December last year, under the Dunedin Tracks Network Trust, our group was successful in our application to the Department of Internal Affairs (Lottery Community Facilities Fund) for the costs of preparing a technical feasibility study for our project to connect the communities of Waikouaiti-Karitane and Warrington-Waitati with shared-use pathways; connecting these communities to the city and to central and north otago trails in the future. Our application was aided by letters of support from Kāti Huirapa Runaka ki Puketeraki, the Department of Conservation, the Waikouaiti Coast Community Board and many members of the public. We were particularly pleased to get a letter of support from the Otago Regional Council's Andrew Noone.

A press release with more information about the feasibility study is available on the [Dunedin Tracks Network Trust website](#). Work is progressing well. The study will be completed by September this year ahead of further funding applications for design and construction from the DIA and other sources.

The fact that our Coastal Communities Cycle Connection group received significant funding for a feasibility study shows that the national funding environment is favourable for cycleway/shared-use pathway projects. As a region, we should be encouraged by this to seize the opportunity to build on our existing cycling assets and progress with a broader vision to connect our communities to each other and to neighbouring regional cycleways. We can tap into national funding programmes and enjoy our 'piece of the pie'.

A project manager funded by Otago Regional Council to progress the development of our trail would really take the pressure off our community volunteers to move this project forward. Our group is determined to fulfill our vision and we look forward to working closely together with stakeholders to make this happen.

Kā mihi
Emily Cooper
Coastal Communities Cycle Connection



6th May 2022

Otago Regional Council

Private Bag 1954

Dunedin 9054

Otago Regional Council Proposed Annual Plan 2022-2023

Tena koutou,

Please find enclosed submission from the Department of Conservation in respect of the Otago Regional Council Proposed Annual Plan 2022-2023. The Department supports the proposed actions and expenditure, and particularly commends the Council for maintaining the Long Term Plan programmes in biodiversity and planning.

Please contact Trudy Anderson in the first instance if you wish to discuss any of the matters raised in this submission at tanderson@doc.govt.nz or 027 408 3380.

The Department does not wish to speak on this submission.

Ngā mihi

Aaron Fleming

Kaihautū Matarautaki Director Operations – Southern South Island

Te Papa Atawhai Department of Conservation

Whakatipu-wai-Māori Office

1 Arthurs Point Road | PO Box 811 | Queenstown 9348



Department of
Conservation
Te Papa Atawhai

New Zealand Government
DOC - XXXX

1. General

The Department of Conservation (DOC) supported the Long Term Plan 2021-31 (LTP). This included specific support for increased collaboration between ORC and DOC, increased leadership on biodiversity (including through Predator free 2050, Jobs for Nature initiatives and the Ngā awa river project), pest management, and increased work on freshwater.

We are pleased to see that the LTP's approach in these areas has been retained in the Annual Plan. We recognise that these are challenging times and ORC needs to balance expectations and affordability. However, the pressing issues in biodiversity and freshwater cannot be ignored, and it is pleasing to see that ORC has recognised this in retaining these provisions, within the overall funding envelope signalled in the LTP. We also note that central Government has stepped up its own contribution, particularly through the Jobs for Nature programme.

Since the LTP was completed, the Government has released the Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy Implementation Plan. This document recognises that regional councils have key roles to play – in particular, that they “*operate according to a landscape-scale view of biodiversity management across all tenures, rohe and agencies*” and “*provide tactical leadership at ground level across many programmes and projects – interface between people and management operations*”. It is heartening to see that the LTP has already positioned ORC for these roles, and DOC strongly supports the continuation of this through the Annual Plan.

2. Specific comments

Governance and Engagement

DOC strongly supports the Plan's focus on collaboration and regional leadership.

We specifically support provision for an additional FTE to support partnership with Kāi Tahu and Iwi liaison and strategic stakeholders, given the importance of manawhenua and stakeholder relationships.

Regional Planning

The RPS is a fundamental document for Otago's future, and will guide all regional and district plans (including through the critical transition to new resource management legislation and plans). We therefore support the continued focus on the RPS, and we will continue to work with ORC on this and other planning initiatives.

Regulatory

We support the ongoing focus on this function, and on maintaining and building on the step changes already made under the LTP.

Land and Water

We understand that the Annual Plan maintains the LTP programme. The key elements of that are all areas where DOC has a strong interest and involvement, and we commend ORC for maintaining its commitment to these programmes and projects. In particular, we look forward to the development of Integrated Catchment Plans, and progress on the Land and Water Regional Plan and review of the Coastal Plan.

Biodiversity and Biosecurity

We are pleased to see that ORC recognises its role to promote biodiversity protection and enhancement across Otago, and is increasing its support for on-ground biodiversity initiatives. We support the increase in expenditure in this area, and are pleased to see the contribution of Jobs for Nature to this. In addition, the Otago Biodiversity Forum is an effective interagency initiative to discuss pertinent regional biodiversity matters and we are keen to see this continue.

Thank you for the opportunity to submit. We look forward to continuing to build on our work with ORC to achieve our aligned outcomes.

Nāku noa, nā



Aaron Fleming

Kaihautū Matarautaki Director Operations – Southern South Island

Te Papa Atawhai Department of Conservation

Pursuant to delegated authority on behalf of Penny Nelson, Director-General of Conservation.

May 2022

To Otago Regional Council

Please find attached DPA's submission on the Draft Otago Regional Council Annual Plan 2022/23

Disabled Persons Assembly NZ

Contact:

Chris Ford

Regional Policy Advisor

Dunedin Kaituitui

Disabled Persons Assembly NZ

Phone: 027 696 0872

Email: chris.ford@dpa.org.nz

Introduction

The Disabled Persons Assembly NZ (DPA) is a pan-impairment disabled person's organisation that works to realise an equitable society, where all disabled people (of all impairment types and including women, Māori, Pasifika, young people) are able to direct their own lives. DPA works to improve social indicators for disabled people and for disabled people to be recognised as valued members of society. DPA and its members work with the wider disability community, other DPOs, government agencies, service providers, international disability organisations, and the public by:

- telling our stories and identifying systemic barriers
- developing and advocating for solutions
- celebrating innovation and good practice

The submission

DPA welcomes the opportunity to submit on the Otago Regional Council's (ORC) Annual Plan 2022-23.

DPA wishes to make several points in respect of the proposals contained in this annual plan around accessible transport, air quality and climate change.

Accessible Transport

DPA commends the ORC for accepting the Government's recent additional temporary funding which facilitated a significant reduction in public transport fares for buses and other platforms, including Total Mobility (TM), both of which are used by many disabled people. This significant reduction in fares has seen a major increase in bus patronage across the Otago region, especially in the main centres of Dunedin and Queenstown.

The impact of the recent fare reductions which have seen a 75 percent discount (instead of the usual 50 percent) applied for people who use Total Mobility to access both mobility and ordinary taxi services is yet unknown. However, going on the surge in usage which occurred following the adoption of fare free TM during the first Covid-19 lockdown in 2020, it is likely that there will have been another surge this time around.

However, DPA would like to see public transport become fare free for all bus and TM users across the country, which can only be undertaken with the provision of adequate funding from both central and local government. We are keen to see both central and local government make free fare/affordable public transport a permanent feature of the transport landscape and not just introduce it at times of crisis such as during the inflationary shock we are undergoing at present. In this regard, DPA supports the Aotearoa Public Transport Equity Coalition's current campaign which, amongst other asks, is recommending the permanent introduction of fare free public transport across all of Aotearoa with adequate central and local government funding underpinning this.

DPA is concerned about the statements contained in the draft annual plan around the \$2 fares requiring 'further consideration' due to fiscal issues. We understand that this shortfall will need to be addressed and that central government funding from Waka Kotahi/NZTA will need to be forthcoming in this instance. However, we also note that the DCC has made funding offers to ORC to maintain these fare levels in the past and these have, disappointingly, been turned down. DPA is keen for the \$2 fare structure to be retained as this has been successful in lifting public transport patronage as noted above. We would like to see ORC re-commit to retaining the \$2 fares and lobby central government for adequate funding to continue them with a view to moving to fare free public transport.

Also, while noting that there have been improvements in public transport provision for disabled people in Dunedin over the last decade, the reality is that there is more work that remains to be done, not only in Dunedin but throughout the region on this. We are aware of the recent comments in the *Otago Daily Times* by disability advocate Nick Stoneman about public bus access not being 100 percent fully accessible and/or safe along some routes in Dunedin and that much work still needs to be done to improve access around the bus hub as well.¹

¹ Francis, O. (2022, April 23). Disability access lacking on buses and at bus stops. *Otago Daily Times*. <https://www.odt.co.nz/news/dunedin/disability-access-lacking-buses-and-bus-stops>

DPA understands that initial accessibility audits have been undertaken of the bus hub for ORC by John Marrable from Livingwell Resource Centre who is a disabled person himself and an accredited barrier free auditor. DPA would like to see the issues that he and other disabled people have identified resolved during the coming year. DPA is keen for the disability responsiveness and awareness training for bus drivers to continue to be delivered by disabled people from across the impairment spectrum, including blind and low vision people, people with mobility impairments, people with learning disability, and Deaf and hard of hearing people. Overall, DPA wants ORC to realise its own vision, articulated in its final Regional Passenger Transport Plan (RPTP) adopted in 2021, of having all public transport available to everyone on an inclusive basis through the full adoption of the universal journey where every aspect of any public transport passenger's journey, including those of disabled passengers, is fully accessible.

Air quality

Secondly, DPA is concerned about the Council's ongoing curbing of its air quality monitoring programme. We have raised this issue in our previous submission. While Council has committed to continuing air quality monitoring in this annual plan, we remain concerned at reports about monitoring and enforcement activities being cut back. DPA considers this work to be critical, especially for disabled people and people with health conditions who experience respiratory conditions, to know what the risks are in areas susceptible to bad air pollution, especially in urban centres. DPA recommends the full restoration of air quality monitoring and compliance activities across the region and that this be fully funded and given high priority.

Climate change

Thirdly, DPA wishes to highlight the impact that climate change will have on disabled people alongside other marginalised communities. ORC in planning for climate change, needs to firmly engage with the disability community as we will be one of the most severely impacted population groups and this is already becoming evident globally.²

² Schulte, C. (2020, March 28). People With Disabilities Needed in Fight Against Climate Change. Retrieved from <https://www.hrw.org/news/2020/05/28/people-disabilities-needed-fight-against-climate-change#:~:text=People%20with%20disabilities%20are%20at,said%20in%20a%20recent%20report.>

Disabled people, particularly those with mobility impairments, are at risk of being forced to move as part of any planned retreat, particularly from flat, low-lying communities in the future. We note the work that the DCC and ORC have started on the South Dunedin Future Project which aims to climate proof that community, given that it contains a high number of disabled people, from the worst vagaries of climate change.

DPA is keen to be more fully involved in the process of climate change planning going forward. We recommend that a process along the lines of that deployed in Bristol, UK, be used where their local council has engaged (and continues to engage in) climate change planning and dialogue with the local disability community. The city council there co-developed a plan with the Bristol Disability Equality Forum (a Bristol-based disabled people's organisation which is cross-impairment based like DPA) around climate change and its impact on disabled people which aims to address accessibility and other issues from an environmental /disability lens.³

As Dunedin and Otago councils progress towards their next 10 Year Plans, a process along these lines could be undertaken as a partnership between the DCC/ORC and disabled people to create a disability community climate change plan which would be incorporated into either existing or updated climate change plans, such as the ORC's own climate change planning.

We wish to signal our interest in having Council start discussions around this now with the disability community so that this idea could be fully developed for inclusion in the next 10-year plan with appropriate funding to back this.

UNCRPD

The UNCRPD Articles most relevant to our submission are:

- Article 4.3 Involving disabled people and our organisations in decisions that affect us

³ Bristol Disability Equality Forum (2020). *Community Climate Action: Let's Make Change with Bristol Disability Equality Forum*. Retrieved from (<https://bristoldef.org.uk/community-climate-action/>)

- Article 9 Accessibility
- Article 19: Living independently and being included in the community
- Article 20: Personal mobility

New Zealand Disability Strategy 2016-2026:

- Outcome 5: Accessibility
- Outcome 6: Attitudes
- Outcome 8: Leadership

Wider impact on Disabled People

Enabling disabled people to fully participate in society through our involvement in climate change awareness and action as well as providing accessible transport and air monitoring are just three of the things that ORC can do to meet its obligations under the UNCRPD and other international human rights agreements and domestic strategies.

DPA's recommendations

Recommendation 1: DPA recommends that ORC support moves towards free fare transport for all public transport users, including those who access this via the Total Mobility scheme. In the meantime, ORC should retain the \$2 bus fares and lobby central government for sufficient funding to support this.

Recommendation 2: DPA recommends that cuts to the air quality monitoring programme be reversed by the ORC so that sampling can resume in all locations around the region to identify where the worst polluted areas are. Steps should be taken to improve air quality for everyone through associated measures such as the ORC contributing funding to businesses and households to assist in the change to cleaner heating methods. These moves would benefit everyone, particularly people with health conditions who live with respiratory conditions.

Recommendation 3: DPA recommends that ORC working in collaboration with the DCC engages with the disability community through disabled people's organisations

which include DPA, on developing a Disability Community Climate Response Plan which would be incorporated into existing climate change plans/strategies.

Conclusion

DPA welcomes discussion on all aspects of this annual plan that we have commented upon. We look forward to having further dialogue with Council as the year progresses over the issues we have identified, some which are new and others ongoing.

BJW ~ Points raised from the ORC AP 2022-23 include the following:

Pg 4:- “Reprioritising existing expenditure tagged to developing the Land and Water Plan to complete an economic assessment of Otago’s natural fresh water”.

Question: What is the objective of this in relation to the existing Regional Plan:Water? Explain the scope of the economic assessment & why it is being prioritised ahead of the L&W Plan itself?

Pg 8:- “Customer satisfaction levels are maintained or improved”

Comment: Customer satisfaction levels need to be significantly improved, right from Board level through to staffing. My view is that ORC's community reputation has suffered considerably over the past 4-5 years resulting from substantial negative press exposure. That is not going to reverse overnight.

Pg 9:- “The proposed Annual Plan provides additional capacity to complete comprehensive economic assessment relating to Otago’s freshwater. This new work adds to the LTP stepped increase in capacity to provide direction on non-RMA plans, important regional issues and urban development”.

Comment: Explain this in plain english!!! Also see comments Pg4. Objectives & Outcomes? Given the recent IPCC report has identified that some 70% of global GHG emissions come from urban environments, sustainable growth in them is paramount.

Pg 10:- “LOS: Collect information on Otago regional wellbeing (economic, social, cultural, and environmental) and identify significant issues. LOS: Collect and make publicly available accurate, relevant and timely information on climate change in Otago”.

Question: Why is ORC doing this? Surely there is a wealth of information already available via other NGO's & organisations that cover much of this information. It is time to stop COLLECTING and start IMPLEMENTING !!

Pg 11:- “LOS: Lead a regional approach to climate change in partnership with local councils and iwi. Complete an annual report on regional climate change collaboration and report to Council

Comment: Yet another REPORT? See the 2017 Bodecker Scientific report "The past, present and future climate of Central Otago" commissioned by CODC. Otago NGO's & TLA's should already be collaborating together - why does ORC Council need yet another a report to tell them that? ORC needs to be at the forefront of instigating climate change mechanisms & adaptive technology.

Pg 13:- LOS: Provide effective and efficient compliance monitoring, investigations and enforcement services and take appropriate actions to ensure the lawful use of natural and physical resources.

Comment: An explanation of how ORC is going to support & service these claims is lacking. How many additional staff are required, what training regime will be applied, what is the budget impact?

Pg 15:- Environmental management is at the heart of what the regional council does. Our focus is to enhance the overall effectiveness of environmental management by:

- Continuing the review of our regional plans (for water, air and coast), while still working with community groups, stakeholders and land managers to promote good environmental outcomes
- Increasing our level of work in biosecurity management
- Continuing to promote well-coordinated and cross-agency biodiversity initiatives across the region
- Transitioning towards integrated catchment action planning, to improve what we do and the results achieved for freshwater, land, the coastal environment, or ecosystems
- Increasing our science capacity with a focus on environmental monitoring to better inform our regional planning and understanding of Otago's natural resources.

Comment: Encouraging to see ORC continuing to "increase / promote / transition", but how do you actually quantify / police this so that the public know their rates are being effectively applied ????

In the RPS ECO-M6 it states:

ECO-M6 – Engagement: Local authorities, when implementing the policies in this chapter, will:

(1) work collaboratively with other local authorities to adopt an integrated approach to managing Otago's biodiversity across administrative boundaries,

(2) engage with individuals (including landowners and land occupiers), community groups, government agencies and other organisations with a role or an interest in biodiversity management, and

(3) consult directly with landowners and land occupiers whose properties potentially contain or are part of significant natural areas.

Personally I think ORC should be doing more than passing the buck on to other TLA's - it should be setting examples and its science capacity has been sadly lacking in this regard for some time. Monitoring is important, however implementation & investment in real-world projects is essential.

Pg 16:- What we do

- We assess and monitor the health of Otago's fresh- and coastal water and their ecosystems and investigate the risks and issues likely to affect their values;
- We prepare, assess, and review the Regional Plan: Water and Coast
- We carry out non-regulatory interventions that support sustainable land management practices and environmental initiatives that enhance Otago's water bodies and coast.

Why we do it

Otago's water bodies and its coast are highly valued by the community:

- Majority of Otago's rivers and lakes are swimmable; and support a wide range of recreational activities
- Freshwater is a key resource for domestic use, agriculture and electricity;
- Otago's waters provide the habitats for 25 species of indigenous freshwater fish, of which 18 are classified as threatened or at risk; and for a large range of marine life and sea birds.

Comment: In my role as a long-term Guardian of Lk Wanaka, we repeatedly requested input from ORC in the form of support to establish one or more monitoring buoys in our ecologically unique but vulnerable great lake(s) over the years, only to be repeatedly rejected. ORC's assessment methodology and that deemed necessary by the Guardians has been aeons apart for years. Had that monitoring buoy been in place a decade ago, some solid & valuable baseline data would have been available by now.

Pg 16:- ORC has a key role to play to ensure Otago's water bodies and coast support healthy ecosystems, and a healthy community:

- Only ORC has the power to control the use of water, land, and the coast under the Resource Management Act (1991)
- It must engage with the region's communities to define visions and objectives for the region's freshwater bodies, and identify the methods to achieve these visions and objectives (National Policy Statement for Freshwater (2020))
- It has the technical expertise and knowledge to advise on the region's environmental health, issues and risks, and to monitor natural water resources.

Question: The community is well aware of most of this and has known about it for decades, but here we see it repeated ad nauseum in ORC's annual plan. Why? By now systems should have been in place to mitigate many of these impacts so I question ORC's "technical expertise & knowledge" to "advise and monitor".

It is time to pull up the braces, tighten the belt and actually instigate projects & policies on the ground that will serve as achievable guidelines for communities to embrace. Since being made redundant from AgResearch in 2004, I have worked hand in hand with several high country runs, monitoring selected sites and providing biodiversity & land management information, and now we are seeing significant improvement in vegetation cover, particularly on hill country catchments which not only improves water quality and quantity, but can also boost C sequestration. Where are the equivalent collaborative projects from ORC that prove it is actively involved with communities in this regard?

Pg 16:- The proposed Annual Plan 2022-23 maintains the agreed LTP programme.

- Preparation of the Land and Water Regional Plan. It will define freshwater objectives, as required by national legislation and set policies and rules for decision-making. Work includes:
- Programmed consultation across FMU/Rohe
- Underpinning work supporting discussions on options, and presentation of preferred options. This includes science support (eg modelling, freshwater accounting, land use mapping, groundwater resources, ecological threshold analysis)

Comment: Again - this is mostly theoretical stuff and I believe ORC puts too much emphasis on it. Universities and CRI's should be covering many of these bases. As an environmental advocate ORC should be implementing change, not just overseeing / monitoring it / writing reports and patting itself on the back.

Pg 17:- Environmental Enhancement (fresh water implementation)

- o Priority site specific projects of Lake Hayes, Tomahawk Lagoon and Lake Tuakitoto
- o Support for catchment groups and land managers delivering desired results

Comment / Question: Otago's major lakes are no less at risk, in fact perhaps moreso, of adverse environmental impact. They do not seem to attract any sort of prioritisation in this document.

What is the "Otago Lakes Strategic Plan" - obviously yet another report but what is its timeline, what is it supposed to tell the community and how will that be implemented?

Pg 17:- LOS: Monitor the state of Otago's freshwater resources and coastal environment and make accurate, relevant and timely information publicly available. Annual report on monitoring programme completed and reported to Council x 7

Comment / Question: Again lots of monitoring and reporting but who does the dirty work and how is that going to be supported financially and socially?? And it seems ORC is still going to be doing that same job literally a decade down the line. Who is going to read these reports (Council, yes, but who else) and what is the expected outcome from them?

This has shades of pest control and the Rabbit & Land Mgt Programme of the past (see Pg 21). ORC has put that in the too hard basket, pulling out of all involvement other than policing rabbit control in the community but in reality not having the teeth nor man-power to actually carry that out effectively.

I respectfully suggest the environment is a bit too important to treat it in a similar manner.

Pg 19:- LOS: Promote and enable best practice land management for soil conservation, water quality preservation, the efficient use of water and to enhance Otago's biodiversity and ecosystems. Three or more projects supported per year

Comment: Finally we have something tangible in terms of real outputs, but no information on what these "projects" are, nor reference to previous or future work.

Having spent years applying for research funding under the CRI system and producing reams of paper explaining exactly what, why and where to the Gods of FRST/MORST etc, often as not to be challenged and cut back, ORC simply repeats itself over several annual plans with no detail. How can the ratepayer fully understand and appreciate the value of this research to their community without greater information?

Pg 20:- Biodiversity and Biosecurity

What we do

- We lead and facilitate collaboration on biodiversity programmes and initiatives in the region.
- We investigate, monitor and provide information about Otago's biodiversity, including improving our understanding of its vulnerability to climate change
- We lead pest and biosecurity management in the region
- We promote and support community and farmer initiatives to protect and enhance Otago's biodiversity and ecosystems

ORC is the only agency with a remit across all of Otago to promote biodiversity protection and enhancement.

Comment: If so, what is DoC's role then?? Both biodiversity and biosecurity are critical to environmental sustainability and improvement for the future. They play a crucial role in the sequestration of Carbon to offset climate warming by preventing ingress of unwanted diseases and pests, and by promoting development of indigenous vegetation communities with far longer sequestration outcomes and monocultural issues than is possible with most exotic species.

Pg 21/22:- Supporting on-ground biodiversity restoration, enhancement and protection initiatives

New central government grants **relating** to 'Jobs for Nature' scheme are included the proposed Annual Plan 2022-23.

The Eco Fund grants programme will gradually expand over the LTP providing increasing opportunity for local groups to access support for their activities.

Otago Catchment groups and their environmental enhancement initiatives will continue to be supported and increasingly ORC will be looking to invest in landscape restoration and enhancement as an integrated part of our regional pest and predator control programmes.

Education and awareness about Otago's biodiversity and how to protect/restore it will be progressively integrated into our farm support programmes and in the longer term into our approach to farm plans.

LOS: Monitor the state of Otago's indigenous biodiversity ecosystems and make accurate, relevant and timely information publicly available

Comment: Here we go again – under this LOS it is back to monitoring and annual reports. ORC will need an army of monitoring technicians and report writers to keep on top of all this. In terms of landscape restoration and enhancement, ORC should also be taking a stance against blanket C-offset planting of exotic conifers on productive farmland and lobbying the OIO to prevent international involvement in this practice.

Pg 22:- LOS: Collaborate with iwi, DOC and other key organisations to develop, coordinate and deliver a programme of actions to enhance indigenous biodiversity. Actions listed in the Biodiversity Action Plan (BAP) are prioritised and progressed.

Comment: Good - this initiative is fully supported. As a wider community we need to endorse the qualities of indigenous flora & fauna in our environment. Short-term "solutions" like selling productive farming land off and planting in exotic conifers to fulfill C sequestration offsets, often by international investors, will come back to bite us eventually. TLA's need the legislative tools to prevent this.

Pg 23:- LOS: Provide support and funding to selected initiatives and organisations across the region which deliver biosecurity, biodiversity and environmental outcomes that align with our strategic objectives.

Comment: supported, but the performance targets are simply more reports to Council. This is overkill in terms of productive deliverables from ORC – ratepayers want to see tangible outcomes!! Two plans are mentioned – the Biodiversity Action Plan and the Biodiversity Operational Plan – explain. Are these one and the same, or different?

Pg 25:- LOS: Monitor Otago's air quality and make accurate, relevant and timely information publicly available. Implement regional air monitoring programme.

Comment: Dare I say it ??? More Monitoring and Reporting

ORC needs to put some pressure on Central Govt, our dividend hungry power companies that Central Govt dangles its dirty fingers in, and our inept power distribution company. And dont start me on Airport Companies!!!

If ORC genuinely wants to clean up the air, especially in geographically challenged communities, then the cost of electricity has to come down (or be subsidised in winter), however the increasing demand for expensive, environmentally hazardous EV's on our roads is going to offset that as demand for charging increases under Govt initiatives. Catch 22.

Pg 35:- Regional Land Transport Plan. By statute, the Committee is responsible for the preparation, review and implementation of the Regional Land

Transport Plan. It shapes decisions and actions about Otago's land transport system and reflects central government's strategic direction including:

- Improving accessibility to transport and create more choice in how we travel
- Reducing the impacts of transport on climate change
- Improving urban environments and public health
- Reducing deaths and serious injuries

LOS: Advocate for Otago's regional transport planning priorities and aspirations at a national level

The Regional Land Transport Plan (RLTP) is reviewed and submitted in line with the Land Transport Management Act 2003 and any guidance issued by the New Zealand Transport Agency (NZTA)

Comment: All I will say here is, as former Chair of the CODC Roading Cttee and contributor to development of previous RLTP's, we are still well behind the 8 ball, primarily restricted by Central Govt engagement and input. Our state highways in particular, managed by NZTA, are suffering from exponential growth in heavy traffic transport, in particular the larger 50tn capable vehicles which makes normal commuter travel on them more restrictive and unsafe.

State highways are tramlined, have patches upon patches of repairs, soft fractured road edges and compromised base materials, undulating surfaces and are increasingly deteriorating. An increasing mix of light and heavy vehicles as traffic densities rise on narrow state highways is a recipe for disaster.

While motive power may gradually shift away from ICE in favour of EV's, biofuels and possibly Hydrogen, vehicle numbers and congestion on our state and local roads is not going to decrease. Multi-modal heavy transport must be embraced to shift the emphasis onto rail and coastal shipping, and improved passing opportunities need to be incorporated into regional SH's along with road surface improvements. The current initiative to blame most road fatalities on speed and use that as an excuse to lower speed limits is false – driver distraction and cognition, combined with poor driving skills and substandard road maintenance are far greater causes.

And yes - public transport needs to be improved. I fail to understand why we see so many large 40-60-seater buses on routes with only 2-6 people on board. Reduce the bus size, increase the bus frequency and diversify routes and people might use it more. Seems a no-brainer but???

In Summary, I detect too little in the way of tangible outcomes that will satisfy ratepayers that their annual contribution, set to rise considerably, is spent wisely. There is too much monitoring, too many reports to Council. ORC staff need to be out in the field, engaged in practical projects and assessment work in tandem with landowners and other environmental groups.

Barrie Wills (Central Environmental Services, Alexandra) May2, 2022

Office of the Mayor



Annual Plan Consultation
Otago Regional Council
Private Bag 1954
DUNEDIN 9054
<https://yoursay.orc.govt.nz/ap22>

Kia ora koutou

SUBMISSION ON THE OTAGO REGIONAL COUNCIL'S PROPOSED ANNUAL PLAN 2022-23

1. The Dunedin City Council (DCC) welcomes the opportunity to submit on the Otago Regional Council's proposed 2022-23 Annual Plan.
2. The DCC appreciates the support and partnership of the Otago Regional Council (ORC) on matters of shared responsibility and interest. The DCC looks forward to continuing to work closely with the ORC for the benefit of Dunedin, its residents and ratepayers.

Natural environment

3. In 2016 the DCC adopted Te Ao Tūroa – The Natural World, Dunedin's Environment Strategy 2016-2026. Te Ao Tūroa takes a partnership approach to delivering on the city's environment ambitions to facilitate and secure a healthy environment now and into the future.
4. The Strategy implementation is tracked against several environmental indicators including those that the ORC is legislatively responsible for monitoring, including air, soil and water quality.
5. The DCC strongly encourages continued monitoring of environmental health indicators and encourages ORC to explore more robust reporting on air pollution. The DCC notes the damaging effects of poor air quality and urges the ORC to restart its air quality monitoring programme.
6. The DCC supports collaboration on our Otago Harbour Reserves Management Plan. The ORC, DCC and Port Otago committed in 2017 to the formation of a Harbour Stakeholder Group. The DCC is committed to a shared vision for the wellbeing of the Otago Harbour and supports funding for this to be included in ORC's 2022/23 budget.

Biodiversity and Biosecurity

7. The DCC, along with the ORC, is a core funder of the Predator Free Dunedin collective comprising 22 organisations. The DCC and ORC are working together to achieve a

predator free status over 31,000 hectares, as part of the Predator Free New Zealand 2050 vision adopted by the Government in 2016.

8. The DCC has a role and responsibility to manage indigenous habitat and to control noxious animals and weeds on DCC land and works alongside the legislative roles and responsibilities of the ORC and the Department of Conservation (DOC) to manage pests in the Dunedin city boundary.
9. The DCC supports efforts by the ORC to enable native biodiversity to thrive as well as maintain healthy ecosystems. The DCC shares the view that resourcing needs to be increased if we are to collectively achieve Otago's objectives in biodiversity and biosecurity.
10. The DCC supports the prioritisation of the following activities in the ORC's proposed 2022-23 Annual Plan, with additional work on the following areas, supported through external grants:
 - The 'Jobs for Nature' programme
 - Mt Pleasant/Te Haka Pupu River restoration project
 - Wallabies Pest Control Management

Parks and Recreation

11. The DCC would like to note that at the Parks and Recreation level there are a number of areas where regular ongoing collaboration could be of benefit to both Councils.
12. The DCC has a beneficial relationship with the DOC on a range of projects. Widening that relationship to include the ORC would improve knowledge and understanding of the environment we collectively manage.
13. An example of this is increased collaboration on Tomahawk Lagoon could benefit from stronger linkages across our organisations. The DCC, DOC and ORC have an interest in how the lagoon and surrounding spaces are managed.

Safety and Resilience

14. The DCC's Civil Defence Emergency Management activity contributes to its commitment to being a sustainable and Resilient City, with a strong link to the strategic direction of Safe and Healthy People as detailed in its Social Wellbeing Strategy 2013-2023.
15. The DCC has a statutory role to plan and provide for all matters of civil defence and emergency management within its district. This is delivered by the activity through planning with a wide range of organisations, including the ORC, to ensure a coordinated response to and recovery from emergency events, maintaining emergency facilities and equipment, delivering training and public education programmes and ensuring the city has the latest hazard information available to it.
16. The DCC supports the increase by three full-time equivalent staff to the ORC's emergency management team, as detailed in the ORC's proposed 2022-23 Annual Plan.

17. The DCC supports the proposal to reclassify natural hazards LiDAR (Light Detection and Ranging) work programme expenditure from the ORC's capital to operational expenditure.
18. The DCC appreciates the partnership with the ORC on the South Dunedin Futures Programme and supports continued collaboration on this climate adaptation work.

Governance and Engagement

19. The DCC is strongly supportive of the ORC's investment in regional leadership, particularly in partnering with Kāi Tahu and in community engagement. Consistently successful engagement with iwi Māori results in better decision making, more robust and lasting solutions and more engaged people and communities. The DCC is also moving towards a future where it will be business as usual for our staff to view council work through a Māori responsiveness lens. The DCC is committed to growing our partnership with mana whenua through considered collaborative engagement as befitting Treaty of Waitangi partnership.
20. The DCC supports the ORC's commitment to continuing its work under the 'Partnering with Mana Whenua' section of its Long Term Plan, and the addition of a full-time equivalent staff member, to increase capacity to support partnership with Kāi Tahu, liaison with iwi, and strategic stakeholders.

Regulatory

21. The DCC supports increased investment in research, monitoring and environmental studies, as outlined in its Three Waters Strategic Direction Statement 2010-2060 and Te Ao Tūroa – The Natural World, Dunedin's Environment Strategy 2016-2026.
22. The DCC encourages the ORC to collect more urban water quality data in line with the vision, goals and methods of the ORC's Urban Water Quality Strategy 2017. The DCC is also investing in increased water quality monitoring.
23. The DCC supports the ORC reprioritising existing expenditure tagged to developing its Land and Water Plan to complete an economic assessment of Otago's natural fresh water.

Transport

24. The DCC, ORC and Waka Kotahi Shaping Future Dunedin Transport programme relies on significant further mode shift. Therefore, the need for an effective and integrated public transport network is a priority for the DCC.
25. With fuel prices rising and increasing pressures on household costs, the DCC encourages the ORC to take whatever measures they can to make public transport an affordable option for commuting around our city.
26. The DCC notes the need to increase the planning and delivery capacity across the public transport network to respond to future demand. The ORC plays a significant role in transport planning and should ensure funding allocated to transport is sufficient to service the people of Dunedin.

27. The DCC still wishes to assume the governance of Dunedin's public bus service and asks the ORC to progress discussion with the DCC to enable this. The DCC believes this would enable improved transport solutions for the Dunedin community and further progress Dunedin's ambition to be Zero Carbon by 2030.
28. The DCC encourages the ORC to recognise the growth in shared off road trails and cycleways across the region and in Dunedin. Such trails and cycleways provide the opportunity for safe and active transport, recreation, health and wellbeing, tourism and economic vitality for our communities.
29. In addition, on-road routes often create potential safety issues; whereas off-road shared paths create a safer cycling environment, and in so doing enable the whole community to utilise them.
30. The DCC encourages the ORC to take an enabling stance for the development of off-road, safe trails when it comes to the use of their lands and waterways including the use of their stop banks. An example being the Hawkes Bay Regional Council trail network.
31. The DCC asks the ORC to support the growth of off-road shared paths across the region and in Dunedin at a strategic level and through the ORC's Regional Land Transport Plan.
32. There is an urgent need to significantly reduce transport emissions to reduce the impacts of climate change. The DCC supports increased investment in Dunedin's public transport as a key component in minimising the city's transport emissions.

Concluding remarks

33. Thank you for the opportunity to submit on the ORC 2022-23 proposed Annual Plan.
34. If the ORC would like to clarify any of the issues raised in the submission, please do not hesitate to get in touch.
35. The DCC would like the opportunity to speak to this submission.

Kā mihi



Aaron Hawkins
MAYOR OF DUNEDIN



The Otago Regional Council
144 Rattray Street
Dunedin

Dunedin Tracks Network Trust (DnTNT) Submission:
ORC Annual Plan 2022 - 2023

Thank you for this opportunity to contribute.

The Dunedin Tracks Network Trust thanks the Otago Regional Council for this opportunity to make this submission.

The Dunedin Tracks Network Trust (DnTNT)

DnTNT was incorporated as a charitable trust on November 13th 2020 with the vision being:

"To develop and promote a shared vision for a world class network of publicly accessible tracks".

We believe key functions of the DnTNT to be:

- i. Bringing together all stakeholders -including DCC Parks and Recreation, DCC Transportation, DCC Economic Development, ORC Transportation, DOC, local community groups and the NZTA (to name a few) to develop one SHARED vision of a diverse world class network of publicly accessible tracks across Dunedin City.
- ii. Supporting all stakeholders in the creation, development and promotion of tracks across Dunedin.
- iii. Raising funds to contribute to creation, enhancement, and maintenance of the city's track network

Introduction

The Otago Regional Council, through its role as 'caretaker' of our environment has a pivotal role to play in relation to the development of tracks and trails connecting our communities with a) surrounding communities and infrastructure and b) our amazing local landscapes.

Landscapes across the Otago region extend from the mountains to the sea, cover diverse terrain, and include many streams, rivers, and coastlines.

Trails across our landscapes connect us...

- to active lifestyles and health and wellbeing, and to each other
- to recreational and commuter routes and connections between communities and regions
- to low carbon tourism opportunities that bring economic benefits to regions and the communities they travel through
- to restoration projects of natural habitats and pest control
- to this land of our ancestors, to te taiao, and our unique natural world
- to our stories and our heritage
- to access for hunting and gathering
- to other recreational opportunities

Movement toward a network of tracks across Dunedin is gaining momentum ...

The Dunedin Tracks Network Trust are presently supporting both the Coastal Communities Connection Group and the Taieri Trails Group with feasibility studies for vital off-road trails connecting local communities and linking Dunedin with regional trails. There is talk of further trails around the Peninsular, and to the south linking St Clair to Tunnel Beach.

The request

Looking specifically at the potential for shared off-road trails across the region we are requesting that the Otago Regional Council;

1. Commit \$80,000 per year, for the next 3 years, so the Dunedin Tracks Network Trust can contract a Tracks Network Project Manager to progress the development of key tracks and trails across the Otago region. It is envisaged the contractor, alongside Trustees, will work with community groups, business's, volunteers, Central and Local Government, and funding providers to ensure key trail of the network come to fruition.

2. Enable the development of shared trails leading to, and running beside, waterways - including the ORC's stop bank networks.

These commitments will promote;

- Cohesive trail development
- Access to trails for biodiversity purposes
- Connections to trails of regional significance.
- Off road shared paths promoting safety; in so doing enabling the whole community to ride them...young, old, physically challenged and families.
- Public has access to outstanding natural features and landscapes in our area
- Low carbon commuters
- Recreational and tourist activity through promotion of staycation options
- Collaboration with Iwi, Councils, DOC, Waka Kotahi and Trail Groups across the region, supporting the development of a regional trail network

In conclusion:

The Dunedin Tracks Network Trust asks that the Otago Regional Council shows leaderships and commits both financially and strategically to the development of a network of shared trails across Dunedin and the Otago region.

We would like to again thank you for this opportunity and look forward to further communication.

Yours Faithfully

Lindsay Dey, Chair
On behalf of the Dunedin Tracks Network Trust

SUBMISSION TO OTAGO REGIONAL COUNCIL ON THE DRAFT
ANNUAL PLAN 2022-23

To: Otago Regional Council

Submission on: Draft Annual Plan 2022-23

Date: 4 May 2022

Contact: **ELEANOR LINSCOTT**
REGIONAL POLICY MANAGER – SOUTHERN REGION

Federated Farmers of New Zealand
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Federated Farmers would like to be heard in support of this submission.

**SUBMISSION TO OTAGO REGIONAL COUNCIL
ON ITS DRAFT ANNUAL PLAN 2022-23**

1 Recommendations

- 2 Otago Federated Farmers welcomes the opportunity to submit on the draft Annual Plan 2022-23 for the Otago Regional Council.
- 3 Supporting information that was supplied in the consultation material for the Long Term Plan had shown that Council is in a strong position. Council owns Port Otago, whose most recent financial reports show that the Port had a record profit for the 2020/2021 year of \$94 million¹.
- 4 The profit was noted as being “driven by unrealised property revaluation increases totalling \$82 million, spread across our diverse portfolio and reflecting increased demand for quality industrial properties. Particularly pleasing was the uplift achieved in our property holdings across the "Golden Triangle", with strong valuation gains achieved in Auckland and Hamilton”.
- 5 Federated Farmers understands that the ORC realised \$10million of this profit as a dividend, and that the full \$94million is based mostly on capital gain. The Consultation document states that careful consideration has been put to “the use of all available funding sources, including investment income, eg the Port of Otago dividend, and debt, to reduce the need for and impact of rating Otago’s households and businesses”. Federated Farmers had highlighted in our Long-Term Plan submission that the Council is in a strong financial position with significant reserves and assets. We would suggest that Council could look at opportunities to lift the dividend from Port Otago to support those essential work programmes in Otago without having continued pressure on rate payers.
- 6 The consultation document indicates that this year’s draft 18% increase in rates is an average “so who pays rates for what across Otago will vary with the value of a property and the services received”.
- 7 The introduction to the consultation document also states that “Most of our urban households, which make up 80% of our ratepayers, would pay an extra \$30 to \$70 per year. For larger or higher value properties, such as farms or commercial operations, the dollar increase is more significant. Our rating for services like pest management, flood, drainage and river management, and public transport can be a large proportion of the rates for those properties”.
- 8 Federated Farmers view is that Council’s rating system is flawed when considering the rates applied to farms. Rates based on property value (capital value) are inappropriate because the value of a property is a poor proxy for income and an even poorer proxy for the benefit derived from local government activities. A large farm in land area does not necessarily have the ability to afford more rates². Income is derived from carrying capacity of the property. An extensive property may have a lesser livestock carrying capacity and/or cultivatable area than a more intensive smaller property. However, the rates wrongly assume that the size of the property reflects income. An increased reliance on rates based on property value will impact those with higher value properties, particularly farmers, who may face

¹ [Record profit for Port Otago » Port Otago](#)

² Earnings before Interest, Tax, Rent, and any paid manager expenses. This places all farms on a standardised basis

similar percentage increases in rates as other ratepayers, but for whom a 1% increase represents significantly more in absolute dollars, than an increase for a similar-sized residential household that uses similar services funded by rates.

- 9 Any rates increase must be absorbed by the farm business and cannot be passed on in prices. On average, over 90% of farm production is exported from New Zealand. Performance in overseas markets, which are highly competitive, combined with capital flows determines the value of the New Zealand dollar, which in turn determines the revenue earned at the farm gate.
- 10 In the regional planning section, the key work for years 2 and 3 highlights a focus on important regional issues and urban development. It also states that there is a work programme to improve understanding of regional wellbeing issue and what that means for Council and partners. However, the metric or target for the Council is only for an “annual report on wellbeing indicators and issues completed and reported to Council”. That is, it does not reference or mention what the programme to improve of regional wellbeing is, or “what that means for Council and partners”. We are sceptical about the value of such a wellbeing report. Council should be focused on efficient delivery of its core regulatory duties and provision of public services as the best way to promote wellbeing, not speculating on broader wellbeing of the region and risk being dragged into costly and wasteful non-core activities.

11 **Regional Planning**

- 12 Federated Farmers have serious concerns about the target for 2022/2023 of “Make RPS operative by June 2023”. We understand and support the need for a quality plan, that is based on sound science, economics, and understanding of the wellbeing concerns of the regional communities. However, the public and expert participation and consultation to obtain this information will require time, some flexibility and consideration. Further, whilst there does need to be a target timeframe by which to complete this body of work; the timeframe appears to be unachievable, noting the dates set out in the Second Minute and Directions of Hearing Panel dated 18 March 2022, specifically paragraphs 17 -19.³

17. *“By clause 51 of Part 4, our panel must report to the council on whatever may be freshwater matters, by a date that is no later than 40 working days before the expiry of 2 years after public notification of the RPS. Taking notification date as 26 June 2021, we must report by mid-April 2023.*

18. *The panel chair is also the Chief Freshwater Commissioner and, in that role, holds a discretion under clause 47 to extend that timeframe, but considers he would need to do so on a principled basis and presently has insufficient knowledge of relevant factors to know how that discretion would be exercised.*

19. *By clause 52 of Part 4, the Council has 40 working days to make its decisions on our recommendations, in this case by early June 2023. That could be followed by a 15-day appeal period, and possibly many months to resolve High Court appeals where our recommendations*

³ [minute-2-and-directions-18-march-2022.pdf \(orc.govt.nz\)](#)

have been accepted, and Environment Court appeals where not accepted and on any recommendations outside scope of submissions.”

- 13 In the event that engagement with the community was compromised in order to achieve the proposed target, this would have a detrimental effect on the wider community. Public participation recognises the unique relationship and understanding that a community has with its natural and physical resources and will therefore assist with identifying both resource management issues and solutions with regard to Otago’s resources.
- 14 Without this invaluable input there is a risk that the RPS framework is not fit for purpose, and this will cost the participants and the region and potentially undermine the Land and Water Plan.
- 15 Otago ratepayers will support the Council in its development of a robust RPS – as this is something that benefits all parties. But the risks and flow on consequences of a rushed plan will end up costing more and impacting the community well-being that the Council is trying to protect.
- 16 Federated Farmers had highlighted in the submission on the Long-Term Plan that these costs along with the increased rates cost are occurring at a time when farmers are facing significant costs and mounting compliance pressures, and a large number include areas managed by regional council. Long drawn out stressful legal processes, coupled with greater levels of responsibility for water quality and quantity, biodiversity, animal grazing, fencing, pest management, all come at a huge cost to the farming and rural communities of Otago. These costs are not just financial, but includes time, stress and impacts on wellbeing on the farming families and rural communities.
- 17 The Consultation document states that the consent processing continues to build for Council, with “stepped change in staff capacity” – we would ask the council to recognise the pressure on the other side (submitters) with that increased compliance load.
- 18 **Regulatory**
- 19 Plan Change 7 was an involved costly process for all parties involved. We note from the Annual Plan consultation document that consent processing is focused on managing expiring consents “with the assumption that most will result in applications for replacement, including Deemed Permits”.
- 20 Plan Change 7 was made operative on the 5th of March 2022. The Council website states that “ORC acknowledges the input of the many submitters at the Plan Change 7 court proceedings, for sharing their experiences and knowledge. Over the coming weeks, staff will assess the implications of the Court decision on resource consent applications that are currently being processed, and on future applications. We will communicate any impacts from the Plan Change 7 decision with consent applicants”.
- 21 An “education-first approach to on-site engagement with farmers and consent holders about national Environmental Standards Fresh Water (NESFW)” is an effective and empowering way to engage and inform the community of changes and compliance requirements. This education-first model should apply across other compliance areas to support and encourage understanding. The education-first model could be used for those impacted by Plan Change 7.

- 22 The targets for the Level of Service Statement “Provide effective and efficient compliance monitoring, investigations and enforcement services and take appropriate actions to ensure the lawful use of natural and physical resources” only include performance measures of the % of performance monitoring returns completed, or the percentage of programmed inspections, or the percentage of significant non-compliance. A performance target that includes a measure of the success of the education first approach as avoiding the need for potential action would be a more community facing approach than measures and targets of compliance.
- 23 With the step change in staff in the ORC, we would like to offer support and guidance from Otago Federated Farmers staff/members and potentially other primary sector stakeholders to share knowledge and deep understanding of the complexities and diversity of Otago farm systems.
- 24 This would include an overview of the policy and factors that Otago farmers are grappling with in the current environment. This will allow new staff to understand and be sympathetic to the broader situation that farmers are in. This could potentially also help Council staff in better environmental outcomes and also help Council with its metrics for public perception.

25 **Environment**

- 26 The Consultation document refers to the preparation of the Land and Water Regional Plan. As we outlined above in regard to the RPS, we would encourage the Council to seriously consider delaying this Plan. The pressure the timeframes put on the Council staff and Otago community only puts at risk the development of a robust plan that works for the region. The requirement for the science support (including modelling, land use mapping etc) require serious and robust scientific data collection – that is an accurate measure of the regional area. Rushed timetables will not help this process.
- 27 Federated Farmers supports and encourages Council initiatives that aid and facilitate catchment groups in Otago via Otago Catchment Communities.
- 28 Federated Farmers support and encourage initiatives for landowner/ community led projects promoting best practice land management for soil conservation, water quality and the efficient use of water.

29 **Biodiversity**

- 30 In the Federated Farmers submission on the LTP we had noted that pest management is a regional issue and not one localised specifically to the rural/primary sector. While we understand the principles behind the Regional Pest Management Plan in reflecting a principled approach based on equity between who benefits and who pays, we would support investment that is necessary but fair from a rating viewpoint.
- 31 Central government has put funding into key pest management over the last couple of years (eg wilding pines). It is critical that the government continues to provide support for these issues and Federated Farmers would help support council in its endeavours to ensure that this continues.

- 32 We note from the consultation document that the key work for years 2 to 3 includes development of a regional partnership approach to indigenous biodiversity. Landowners are a key to understanding accurate levels of biodiversity across the region. With the council’s role in facilitating and coordinating a regional biodiversity hui – we would suggest that landowner representation should be included.
- 33 Federated Farmers supports and encourages council initiatives in relation to grants such as the Eco Fund to support local groups in their environmental activities.
- 34 The Level of Service Statement “Collaborate with iwi, DOC, and other key organisations to develop, coordinate and deliver a programme of actions to enhance indigenous biodiversity” should consider including landowner representation. Partnerships should include engagement with catchment groups and also consider/include rural schools /enviro schools for projects that engage with a facilitate understanding of local indigenous biodiversity.
- 35 Catchment groups are a direct and powerful means of engagement with rural communities on environmental projects that align directly with the needs of the community. Catchment groups can act as the umbrella organisation for side projects involving schools investigating opportunities for improving indigenous biodiversity. Council should consider investing more into the Catchment Community initiative to all other funding opportunity to be supported that would cover new ideas to improve indigenous biodiversity.

36 **Flood Protection, Drainage and River Management**

- 37 We note from the consultation document that the measure and target for “respond efficiently and effectively to damage from natural hazard events” include a performance measure that “damage identified, prioritise and a repair programme communicated with affected communities in a timely manner”. For 2022/2023 the measure is listed as “programme developed and communicated within 3 months of an event”. For rural communities that are impacted by a natural hazard we would suggest that the measure be shifted to ensure that the affected communities are consulted and engaged with throughout the process. Three months is a long time when an event occurs. If it is an event that affects (for example roading or access), effective communication will be critical for the entire community.

38 **Emergency Management**

- 39 Federated Farmers support the work of the Otago CDEM group.

40 **Transport**

- 41 Federated Farmers supports strategies to improve public transport connecting rural communities and supports Councils efforts to obtain grants and Waka Kotahi support.

Federated Farmers thanks the Otago Regional Council for the opportunity to submit on the draft Annual Plan 2022-23.

We look forward to speaking in support of our submission.

Mark Patterson
President – Otago
Federated Farmers of New Zealand



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6 May 2022

Submission on the Annual Plan 2022/2023

1. This submission is made on behalf of the Dunedin Branch of the Royal Forest and Bird Protection Society Incorporated (**Forest & Bird**).
2. Forest & Bird is New Zealand's longest running independent conservation organisation. Its constitutional purpose is to take all reasonable steps within its power for the preservation and protection of the indigenous flora and fauna and the natural features of New Zealand.
3. Forest & Bird has for many years had a strong interest and involvement in improving biodiversity and protecting and enhancing ecosystems within Otago. The Dunedin branch is involved in a wide range of conservation and advocacy activities.
4. In recent decades, the experience of Forest & Bird is that the Otago Regional Council (**ORC**) has dramatically underfunded its work, leading to poor environmental results. For example:
 - a. During the sunset period for deemed permits, between 1991 and 2021, the ORC pulled out of key policy development, community engagement and scientific work related to deemed permits, leading to the 2019 finding that the deemed permit process was not fit for purpose. Critically, an efficiency paradox arose which allowed the expansion of irrigated areas through investment in spray technology without requiring water saved to be returned to the river. In the vacuum left by the ORC, Forest & Bird's experience is that water use intensified and it became more, not less, difficult to move to sustainable abstraction regimes come 2021.
 - b. The failure to effectively halt degrading water quality as intensive agriculture became increasingly prevalent in the region, particularly in north and south Otago. While regulation, in the form of Plan Change 6A, was eventually put in place, key provisions were never properly implemented and their enforcement date was later unceremoniously extended into irrelevance.

From Forest & Bird's perspective, historic underinvestment is a key factor explaining ORC has failed to perform its core functions - particularly the maintenance and/or enhancement of water quality,¹ water quantity,² and ecosystems.³

5. In recent years, the ORC appears to have turned a corner and the current Long Term Plan sets an ambitious work plan which has the capacity to dramatically improve the environment in Otago, should it be properly implemented. Even from the outside, the work plan is dauntingly large because, in many situations, the ORC does not have a robust policy, science or community engagement foundation to build upon. This is a direct result of historic underinvestment.
6. Forest & Bird understands that the volume of work required combined with recent economic turmoil means that the ORC will need to increase rates in order to stay on track with its ambitious work plan.
7. Forest & Bird supports the ORC's ambitious work plan and seeks that the work required to protect and restore Otago's ecosystems is not removed due to budget constraints. Critically, this includes policy and scientific work to support the development of a new Regional Policy Statement and Land and Water Regional Plan. Forest & Bird's plea also extends to smaller 'discretionary' spends, such as the ECO Fund and support to restore catchments through non-regulatory methods.
8. To avoid doubt, Forest & Bird does not take a position on whether rates should rise and its interest lies in ensuring environmental protection and restoration remains a funded priority for the ORC.
9. Forest & Bird sympathises with the cost of living pressures that have been thrust upon people in Otago, especially in this last year. If the ORC is of a mind to ease the burden on those who cannot afford to pay for a rates increase, we suggest that the Council target rates increases towards those who are able to pay.
10. Thank you for the opportunity to submit comments on the Annual Plan.
11. Forest & Bird representatives would be eager to meet with staff and Councillors to further discuss anything raised in this submission.



Nigel Paragreen

Committee member, Forest & Bird Dunedin
0272 050 395

¹ RMA section 30(1)(c)(ii).

² RMA section 30(1)(c)(iii) - acknowledging that it refers only to maintenance, not enhancement.

³ RMA section 30(1)(c)(iia).

Friends of Lake Hayes Society Inc Submission to the ORC 2022-23 Proposed Annual Plan

Friends of Lake Hayes Society Inc. wishes to submit on the proposed Otago Regional Council Proposed Annual Plan 2022-23.

It would also like to be heard when Council holds public consultation on the draft plan.

1. Introduction

Friends of Lake Hayes Society Inc (FOLH) is a community-based group and was formed in 2008. Its aim is to improve the currently degraded water quality in Lake Hayes. From existing scientific reports together with linear catchment sampling programme carried out between ORC and FOLH we have used expert advice to develop a remediation plan with shared responsibilities of all stakeholders, i.e., FOLH, ORC & QLDC. We are now actively promoting this as a vision for the future of Lake Hayes. This Plan involves a major long-term integrated remediation programme in the lake's catchment. FOLH has named this the Vision Lake Hayes Project. It has the aims of:

1. Improving the outflow from Lake Hayes by replacing the culvert under SH 6.
2. Augmenting the flow of water through Lake Hayes by adding cool, surplus water from the Arrow Irrigation Scheme. Most of the required funding for this already exists and completing this project forms part of year 1 21-31 OP Plan. Ongoing running costs associated with providing water from the Arrow Irrigation Co. will be met by maintenance budget starting in year 2 of the 21-31 OP plan.
3. Supporting the implementation of a major integrated catchment management programme in Mill Creek from its headwaters to the lake involving riparian remediation, the restoring of existing wetlands, reconstruction of one new wetland and the installation of sediment traps with ongoing removal of sediment. This project is being undertaken by the local Iwi Trust – Mana Tahuna.

2. Progress made in 2021-22

In the first year of the Long-term Plan 2021 – 2031 some significant progress has been made toward meeting our objectives.

The Wai Whakaata/Lake Hayes Strategy Group has been initiated and now provides a sound relationship-based forum across stakeholders and agencies to progress the long-term well-being of Lake Hayes and its catchment. This has been facilitated by staff and logistical support provided by ORC. We are very grateful for this and believe that the resources expended to achieve this will prove to be an excellent investment for both the ORC and the community as a whole. FOLH was a strong

proponent for this forum and will continue to support it in any way that it can.

FOLH is also pleased that at last there is real progress being made with improving the outflow from the Lake outflow via Hayes Creek. We understand that a solution may be in place by late spring this year. We also acknowledge the generosity of local philanthropist Rod Drury for his undertaking to fund the necessary works. When this project is completed we expect that the popular Lake Hayes walk way will be accessible to the public all year round and that the improved outflow will help increase the rate of expulsion of excessive nutrients from the lake.

We are also pleased with the role that ORC has played in provision of infrastructure to augment the flow of clean water into the lake by using excess water from the Arrow Irrigation Scheme. We hope in the near future that the additional flow will help reduce the amount of nutrients in the lake and reduce excessive algal blooms.

The greatest achievement in the last year has been the commencement of the Lake Hayes Vision catchment remediation project. Mana Tahuna has successfully applied for funding from Central Government under the Jobs for Nature programme. The role of Rod Drury who has provided a very significant amount of seed funding must be gratefully acknowledged. The multiyear project has begun with extensive riparian planting and pest control work. However, at present the main set back is the delay waiting for a resource consent from ORC before proposed more substantial remedial work can be started in Mill Creek.

FOLH as part of the review of QLDC District Plan has actively sought to provide safeguards to protect water quality in Lake Hayes from inappropriate or poorly designed and implemented development in the catchment. It has also supported ORC Water Plan process with the proposed introduction of measures under Plan Change 8 Urban Issues to reduce the impact of sediment loss from development activities.

We believe that the working relationship between FOLH/the local community and ORC has improved considerably over the last year. This has come from more regular contact with key staff in the water, biosecurity, biodiversity and science areas. This has been facilitated by ORC increasing its staff levels and supporting them to interact directly with communities which have particular interests and needs. We would encourage ORC to continue to build its staff capability and capacity so these critical relationships will enable more direct action can be taken to address the many pressing environmental issues around the Otago region.

3. Funding

Friends of Lake Hayes Society Inc continue to support the investment in Lake Hayes remediation as per the original Long Term Plan adopted by Council for the 2021-31 period. This will allow for the continued implementation of programs committed to in 2022 and now in progress.

FoLH note that this investment is supported through a targeted rate increase, which

is now fully supported by the community on the basis the programs supported will, in part, deliver the remediation of Lake Hayes. FoLH also note that this investment is only part of the total investment now bearing brought to bear to achieve this outcome (including central government, community and private investment), and all are dependent on each other for success.

4. Looking Forward

FoLH looks forward to further developing its collaborative relationship with ORC as well as with other agencies including Iwi, QLDC, DOC, Fish and Game, NZTA, and LINZ, in progressing all programmes leading to the remediation of Lake Hayes.

It sees an effective and productive long-term partnership between the stakeholders and the local community with the agencies which are responsible for managing our natural and built resources as critically important. This relationship will not only bring about early strategic alignment on the key issues but will also empower everyone to collaboratively solve the water quality problems in Lake Hayes in a timely and cost-effective way.

Mike Hanff
Chair, on behalf of the Friends of Lake Hayes Society Inc

3 May 2022

Proposed Annual Plan 2022-23 Otago regional council

Summary

Environment, Land and water, Biodiversity and biosecurity, Air quality, Transport, Safety and Resilience, Flood protection, Drainage and river management, Emergency management, and Regional Leadership.

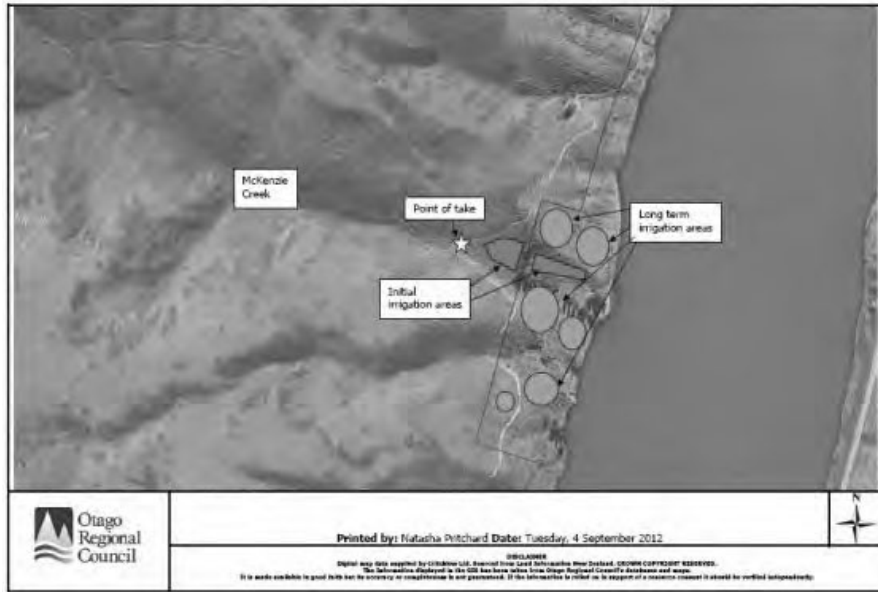
Since 1989 local government reforms, all have been superseded by endless reviews where each community plan has not been supported to date, until the plan out comes are revied for the new greater area, Otago-Southland regional area.

Are council plans still on the right track, no, if they where they would have been, small crops allotment around the Lake Dunstan margins, cycle track? This will still need to be reviewed with LINZ. www.growingsolutions.co.nz.

Each Ward community plan will need a local business structure to grow its future.

One important part since 1989 reforms is the Vincent ward boundaries finally on both sides of the Cromwell gorge where the Vincent ward plan needs to plan for all of its communities as follows, for the greater area to save duplication of resources.

1. Former NZED camp as a Vincent community business hub, with incubators, workshop, community crop centre, community garden and other project that will support the wellbeing of all ages.
2. Defence Hub for integrated services, civil defence, ward support teams, FENZ, Youth groups, coast guards, regional plant material nursery.
3. The services need to support Mace Village within the plan, as asset need to be sold to the global marketplace to offset the increased cost of the Vincent ward three waters plan that costed at 34 million but now at 74, million due to oversights.
4. Resources need to be placed in the correct place due to the boundaries change, and people in time learn to adapt to this change.
5. The southern electorate boundaries will need to be considered as Southland has increased its land holding to enlarge its rating base, as Waitaki electorate may need to support a regional complex that show cases across boarder partnerships, for future boundaries changes, once again for an enlarge rating base, with central government.
6. Waste land, www.growingsolutions.co.nz should still be part each community plan within Otago – Southland, for community development, global partnerships, as all ages invest in land developments.



We all hope the council old plans adapt with the new plans, for all ages, and start with the Vincent plan, for the benefit for all.

Your sincerely
Glen Callanan
Clyde

28/04/2022 1:01:38 PM



Magnet Street
Boat Harbour Reserve
PO Box 5161 Dunedin 9058

21 April 2022

Annual Plan
Otago Regional Council

Dear Sirs,

Thank you for the opportunity to comment on your proposed Annual Plan.

The members of the Otago Yacht Club are Otago residents who use the waterways of the province, and care for the aquatic environment. We are very much interested in the health of Otago harbour especially.

There are problems in this environment and it is disappointing to see no mention of them in the Annual Plan.

The first major issue is the lack of facilities for visiting yachts to berth. Our manager has fielded perhaps twenty calls over the last six months, from yachts wishing to berth in the harbour. Just this week a larger yacht arrived in the harbour and requested a berth and was turned away. We believe Otago harbour has poorer facilities for visiting vessels than most of the other developed harbours in New Zealand.

The second major issue relates to harbour siltation. This seems to have worsened with flood control works on the Leith, which carries more silt into the harbour. This silt creates a navigation hazard in the upper harbour in close proximity to our Club marina. It is likely that the build-up of silt here contributes to silt build-up inside our marina which commits us to recurring expense of dredging. The Coastguard vessel has been berthing in our marina for some months now, and is unable to mobilise to a rescue around low tide.

We ask the Otago Regional Council to take note of these concerns and to develop plans to address them in the near future.

Yours truly,

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John Arnold, Hon Secretary

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Have your say ORC on our proposed Annual Plan 2022-23

Matthew Sole

Chatto Creek Manuherekia Valley

Email [REDACTED]

Are Council plans still on the right track?

Kia ora koutou,

Environmental management is at the heart of Otago Regional Council's work and responsibility.

Extracts from Is NZ's economic growth uneconomic? By Jack Santa Barbara

<https://www.newsroom.co.nz/sustainable-future/is-nzs-economic-growth-uneconomic>

If the goal of our economy is to support human wellbeing in a way that does not irreparably damage the web of life, then a major problem with our main index of national wellbeing, GDP growth, is that it includes things that cost more than they contribute to that goal.

GDP is a seriously flawed indicator of human wellbeing. Yet we continue to place GDP on a policy pedestal. Given the serious divergence of GDP growth from these major indicators of social and environmental wellbeing, why do we continue to support policies and politicians that promote GDP growth, and ignore the net losses?

Putting aside for the moment the enormous hardships and social fragility caused by growing economic inequality, the environmental data alone point to ever increasing risks of social collapse as a result of global ecosystems breakdown. Not only is GDP miscounting these costs, increasing GDP is actually causing many of these serious costs which threaten our wellbeing.

Yet GDP growth remains our dominant goal.

The reasons for this disconnect between the biophysical realities that will determine our future and our dominant policy goal are many and complex. In part it is due to the prominence of economists in policy planning, and the complete disconnect between economic theory and practice, and the real physical world.

Economics seriously ignores the role of natural materials and systems and focuses on their dollar value. Because dollars are just numbers they can grow for ever. But the use of natural materials cannot. This distinction is close to the heart of the disconnect between GDP and human wellbeing. We have been conditioned to mistake dollar value for things that really matter.

All economic activity requires energy and materials, and the more GDP grows the more energy and materials we use. The data from ecological overshoot studies make it clear that globally we have already greatly exceeded natural systems' capacity to continue providing raw materials for the lifestyles we have developed, and the wastes it produces. Climate change is only one of the waste management challenges we face.

How do we get our politicians and policy makers to pay heed to the natural sciences that show us where our biophysical limits are, and establish national goals compatible with the science? How do we encourage our fellow citizens to see these connections? Why are we not only accepting net losses from economic activity, but also promoting them?

Let's get some reality checks into the discussions.

Its vital and imperative we have quality information on the ecological health and function of the Otago environment where our biophysical limits are. We need to continue our science and monitoring capacity.

From all my observations of all our environmental degradation locally – soil, water, air and biodiversity, I fully of the view that “Economics should be a life science based on how human activities take raw materials from nature and transform them into useful goods, and the impact these activities have on natural systems within our local biosphere limits!”

If budget need cutting is required we need to do with some new other indicator metrics based on environmental and human wellbeing

For our planet and our futures we need some new indicators.

These alternative measures of human wellbeing/welfare include the Index of Sustainable Economic Welfare (ISEW), the Genuine Progress Indicator (GPI), and the Human Development Index (HDI). Each of these are composites and include many environmental and social indices, as well as financial ones, all of which contribute positively to human wellbeing.

Matthew Sole

Chatto Creek



3 May 2022

To: the Otago Regional Council

Thank you for the opportunity to submit to the Annual Plan.

The Otago Rescue Helicopter Trust is responsible for raising funds to support the provision of rescue helicopter services. The Trust relies on community donations to ensure the continuation of the service in this region. Our target is to raise a total of \$750,000 to \$1m each year.

There is ongoing growth in demand for the Otago Regional Rescue Helicopter Service that provides a world class critical care response 24/7, 365 days a year, across the vast and geographically challenging area covered. Enhancements in the service, such as the recent development of new IFR (instrument flight rules) routes across the region, enable even more missions to be responded to where weather conditions would otherwise prevent a response.

We note our submission to the Long-Term Plan, and we are grateful for the inclusion of the ongoing annual donation of \$350,000 that is budgeted to continue across the ten years covered by the Long-Term Plan.

Thank you again for your ongoing support. We look forward to presenting to Council later this year.

Yours sincerely

Martin Dippie
Chair Otago Rescue Helicopter Trust

P.O. Box 188, DUNEDIN 9016

Secretary / Manager: | 📞 021 152 2809 | ✉️ secretary@otagorescue.co.nz



Otago Regional Council Annual Plan 2022

Submission from the
Otago Peninsula Community Board

The Board thanks the Otago Regional Council for the opportunity to provide a submission to the 2022 Annual Plan on behalf of the Otago Peninsula Community.

Otago Harbour Management

The Otago Harbour is central to our community for recreation, play, business, biodiversity, transport and food. Our community and its whanau are reliant on its health and management by the Council for the benefit of our community and the wider region. With a significant number of stakeholders and the reliance of them on the harbour for a broad range of reasons greater co-ordination of governance, capital investment and development is required.

- The Board submits that a joint Harbour Management Plan be developed detailing health, recreational development and monitoring outcomes and programmes.
- The Board submits that greater financial investment is required by the Council for recreation, biodiversity and tourism

The Board notes again that recent Ministry for the Environment on the impact of plastic on marine ecosystems. At Pilots Beach on Otago Peninsula, it is reported that:

- There are 15 items of rubbish for every 100sqm of beach, of which 23% is hard plastics and 23% are food wrappers.
- The Board again seeks trials on stormwater filters in conjunction with the DCC to stop plastic entering the harbour and affecting wildlife that is pivotal to our region financially and culturally.



Figures 3&4 show the type of stormwater filters utilised in removing plastics that enter in significant waterways like the Otago Harbour.

Dredging of the Eastern Channel

The Eastern Channel is important to the Peninsula community for recreational boating, potential access between communities during Civil Defence emergencies and for the Coastguard vessel. With the completion of the walkway/cycle way there will be increased demand for access to the harbour. A safe, navigable, maintained Eastern Channel is important to retain access to jetties and ramps on the Otago Peninsula. While the harbourmaster has made inroads around channel markers the eastern channel requires long term consideration.

- The Board submits that ORC needs to work with local boating clubs and Coastguard to identify especially shallow areas that may be able to be addressed in the short term, and to consider a long term plan for the dredging the Eastern Channel.

Public Transport

Public transport is essential for many people within our community and the efficiency and regularity of that service must be continued to ensure our community thrives. The Council have made improvements to the route of the service and recently staff have altered the afternoon timetable in consultation with the Board and the community. This has been a significant improvement for our community, However, like any service improvements could make the service more attractive to Peninsula users.



- With the proposed acceleration of the Peninsula road widening project, cyclists will increase on the road but also we expect the possibility of using the bus to take a bike one way and then ride home, will become a popular trend. The Board submits that buses need to be able to accommodate cycles inside as they do in other countries.
- The Board submits that a continuation of the live information on timetable delays of the current service be continued for our community of commuters.
- Consultation and implementation of bilingual place names and signage on the Otago Peninsula including work with the ORC over bus signage as pictured.
- That the Otago Regional extend the Peninsula service to Taiaroa Head
- That the current turnaround area at Harington Point be altered via the above route change to accommodate the elderly and school users.

Biosecurity – Pest Plants and Animals

The location of the Otago Peninsula and its importance to the region as a hub of biodiversity means that the area faces unique challenges for both public and private landowners who are working to improve their property for the benefit of biodiversity on the Otago Peninsula. Pest plant control is a major component of ecological restoration and one that many landowners and groups spend significant resources on to achieve.

The rabbit problem in our community is high and this creates serious problems with predator/prey relationships for our area due to increased numbers of mustelids surviving on rabbits. This creates high risk for iconic species of birdlife such as Yellow-eyed Penguin and Blue Penguin through predation that the Peninsula and the City relies on for economic wealth and development. While the Otago Peninsula Biodiversity Trust has made excellent inroads in the possum numbers of the Peninsula and has formed a model of community led control, the opportunity is now required to extend that model onto the rabbit/mustelid issues that we have on the Peninsula.

- The Board submits that this should be a priority for the Otago Regional Council so that conservation and biodiversity gains made on the Peninsula and other areas are able to be built on and enlarged.
- It is the submission of the Peninsula Community Board that resources in control, research and advocacy are required from the Otago Regional Council to support landowners and organisations who are undertaking this type of animal control on the Otago Peninsula. Again there is opportunity for information and resource sharing from the ORC and other agencies.

The Otago Peninsula Community Board appreciates the support Otago Regional Council has already given to our priorities and the considerable work staff have undertaken to progress many of them to their current stage. The stronger working relationship we have established with the Otago Regional Council in recent times is greatly

valued by the Board. We look forward to working with the ORC to complete these projects for the benefit of the Otago Peninsula community and the wider city.

A handwritten signature in black ink, appearing to read 'Paul Pope', written in a cursive style.

Paul Pope - Chairman

On behalf of the Otago Peninsula Community Board



Submission on Otago Regional Council Annual Plan

April 2022

Background

The New Zealand Public Service Association Te Pūkenga Here Tikanga Mahi (the PSA) is the largest trade union in New Zealand with over 80,000 members. We are a democratic organisation representing members in the public service, the wider state sector (the district health boards, crown research institutes and other crown entities), state owned enterprises, local government, tertiary education institutions and non-governmental organisations working in the health, social services and community sectors.

The PSA has been advocating for strong, innovative and effective public and community services since our establishment in 1913. People join the PSA to negotiate their terms of employment collectively, to have a voice within their workplace and to have an independent public voice on the quality of public and community services and how they're delivered.

We are an organisation that is committed to the principles of the Treaty of Waitangi.

The PSA represents approximately 3,000 members who live and work in Otago. All of these members have a strong interest in the Plan and its aspirations and intentions; and those members employed by Otago Regional Council and its agencies have an additional interest in how the Plan will affect their jobs and working conditions.

The following is submitted by local PSA members who work at Otago Regional Council.

PSA vision for local government

Local democracy is a cornerstone value for the PSA: vibrant communities are underpinned by strong democratic institutions that aim to support and maximise citizen participation in local decisions.

The PSA stands for strong public and community services. For local government that includes:

- Public and community services that are equipped to support a just transition for communities affected by climate, technology and other change
- Universal access to inclusive public and community not-for-profit services based on need
- Local authorities that are fully funded to provide high quality services to the public and equitable pay and working conditions for workers
- Workers and communities participating in shaping services including through longer term, wellbeing and Te Tiriti o Waitangi based approaches
- Local government organisations that are exemplar employers contributing to high industry standards of employment and pay.

We support public ownership and control of services, facilities and infrastructure. We believe that the constitutional independence of local government must be supported and strengthened, and that local government decision-making should reflect Te Tiriti o Waitangi principles of partnership, protection and participation for Māori.

Overall comments on the draft plan

Workforce

Our main workforce related concerns relate to wage levels, including equal pay, and workload.

Living Wage

The PSA is active in the coalition for the Living Wage and has been instrumental in the campaign in local government.

We understand that all employees are paid at least the Living Wage at Otago Regional Council. If this is not the case, we seek a response informing us of details of the roles where staff are employed at a lesser rate.

We have concern that staff of businesses contracting to the Otago Regional Council are not paid at least the Living Wage. We are aware of a commitment to ensure bus drivers were paid at least the Living Wage but also saw media that suggested that the commitment was not followed through. We are unsure if other contractor staff are also not being paid at least the Living Wage.

In decisions about resourcing we believe the Living Wage should be a bare minimum that all workers – both employees and contractors – should be paid above.

Council has a responsibility for social and economic well-being and needs to provide community leadership. Paying a Living Wage has the potential to provide benefits for the Council, through reduced absenteeism and sick leave, increased staff retention, increased productivity and higher quality of worker output.¹ In addition, MBIE's impact analysis on public service Living Wage increases noted, "there are also likely to be benefits to the local economy, as low-wage workers and households tend to spend a higher proportion of wage gains on immediate needs and tend to spend a higher proportion within their local region."²

Since some Councils cite affordability as the principal barrier to extending the Living Wage to contracting, our points below about keeping services in-house and re-examining the funding base of local government should be considered as part of the solution as well.

The Otago Regional Council should become an accredited Living Wage employer.

Equal Pay

Achieving equal pay for our members is one of the PSA's four strategic goals. Equal pay is a human right and has been a longstanding concern of the PSA. All workers should be paid a fair and decent wage.

We recommend that the Otago Regional Council place a priority in the Annual Plan on working with the PSA to identify and close the gender pay gap.

We recommend that the Council ensures there is adequate resource support in the budget to support equal pay claims, both current and in the future. This resource needs to include funding for achieving pay parity in collective bargaining as a likely flow-on from other successful claims.

¹ <https://sustainable.org.nz/learn/news-insights/pay-living-wage/#:~:text=She%20says%3A%20%E2%80%9CResearch%20shows%20paying%20profile%20of%20the%20organisation.>

² Reynolds, D., Pearson, R., and Voortkamp, J., (1999), The impact of the Detroit Living Wage ordinance. Centre

for Urban Studies and Labour Studies Centre, College of Urban, Labour and Metropolitan Affairs, Wayne State University. Cited in Cabinet paper '[Implementing a minimum Living Wage rate for cleaners caterers and security guards working under Public Service contracts](#)'

Workload

Safe workloads are a critical issue for the health and wellbeing of workers, and the sustainable functioning of Council services. Council resourcing needs to be sufficient to ensure enough staff to meet the volume of work required without resorting to unsafe workloads.

Keeping services in-house

In principle we believe that local public and community services should be delivered publicly by organisations that are democratically accountable to their community and not driven by a profit motive. We believe these services should be retained in-house rather than be outsourced or removed to any form of contractor.

A key issue for PSA members is ensuring that where there are contracted service providers these remain fully accountable to the Council and to the service users.

Where public services are contracted out, we want assurance that the Council will require contractors to follow 'responsible contractor' policies, including best practice employment requirements, health and safety best practice, and a commitment to workforce and career development and job security.

Industrial democracy

The PSA supports industrial democracy, and workers participating in shaping services. Workers have a unique perspective to provide, and have valuable knowledge about where Council systems, processes and practices can be improved. We encourage Otago Regional Council to take a collaborative approach to involving staff in operational decision-making, both on a general basis but, in particular, when it comes to Council initiatives to improve efficiency and effectiveness of services.

Asset sales

As a general point of reference and as statement of principle, the PSA strongly supports the retention of publicly owned assets in public ownership and control and we oppose the sale of assets that are large-scale, strategically important to the economic, environmental, cultural and social wellbeing of the community, and the sale of which will disadvantage future generations. We believe that these are the tests that should be applied by the Council in making any decision to sell assets.

At the same time, we recognise that local government may for a range of reasons own a wide range of assets that are not strategically important. It can make sense to sell small scale assets (e.g. a building or piece of land no longer needed), especially where this would be of benefit to the community in a way that is equitably distributed (e.g. where disposing of Council-owned land would facilitate the provision of affordable housing).

Service cuts

We have seen in the media an oblique reference that Council may need to cut costs and by possible implication the possibility of service cuts in Council discussion. We urge Otago Regional Council not to take the path of job cuts; it is short sighted and ultimately unproductive to divest staff.

PSA members are willing to work with the employer on initiatives to improve productivity, but this will not be possible in an environment of job insecurity.

We know that Council is concerned to manage costs and to deliver services efficiently, and we support this. We stress though that employee costs in local government are not drivers of increased

debt and increased rates³, and these costs are only 23% of all local government expenditure.⁴ Because employee costs is one of the areas within the direct control of a Council, it is seen as the easy option for cost-cutting. But it is also the wrong option.

A just transition to a low-emissions future

An intact, functioning environment is in the public interest and a public good of irreplaceable value. Climate change represents a critical threat to the health of our environment, and therefore our communities. At a local, national and global level we have done too little for too long, and now ambitious action is needed urgently to address the causes of climate change.

We believe much more ambitious action needs to be taken by Otago Regional Council to reduce our region's climate impact. This should include initiatives to improve public and active transport; increase tree planting; and provide compact, affordable and energy-efficient housing that is close to essential facilities and amenities. Such initiatives should be designed with careful consideration of distributional impacts, so that reducing emissions can also contribute to reducing rather than exacerbating inequality.

We also support actions taken by Otago Regional Council to respond to other environmental issues such as water quality degradation and loss of biodiversity.

Public transport

As part of an equitable approach to reducing emissions, PSA supports the Aotearoa Collective for Public Transport Equity's call for free public transport for Community Service Card holders, tertiary students and under-25s.

Central government's recent move to temporarily reduce public transport pricing has demonstrated that reducing fares can be affordable if we choose to prioritise it. Free fares would boost ridership and contribute to the mode shift that's essential to meeting Aotearora's carbon zero 2050 goal, and address structural disadvantages in the transport system.⁵

Rates

We acknowledge that the positions we advocate for in this submission – around fair pay, adequate resourcing, and ambitious climate action – cost money. We believe that these costs are justified, and that investing now is likely to be more affordable in the long-run.

We support a level of rates rises that will enable Otago Regional Council to fully fund the public and community services within its area of responsibility, pay its staff fairly and resource them adequately, do its fair share towards mitigating climate change now, and pay sufficiently for the maintenance of essential infrastructure rather than making future generations pick up the bill.

We support the introduction of targeted rates in situations where they:

- make the rating system more equitable (i.e. by distributing costs away from those most vulnerable and least able to pay), and
- can be used to ensure users with the most significant environmental effects contribute more heavily towards mitigating them (i.e. where they reflect emissions profiles of property types).

³ *Report of the Local Government Rates Inquiry*, August 2007, para 8.29 p81

⁴ http://www.localCouncils.govt.nz/lqip.nsf/wpg_url/Profiles-Local-Government-Statistical-Overview-Index?OpenDocument#LocalGovernmentExpenditure

⁵ <https://freefaresnz.files.wordpress.com/2022/01/free-fares-submission-on-the-emissions-reduction-plan.pdf>

Conclusion

In conclusion the PSA recommends:

- Action to ensure all workers for contractors to the Otago Regional Council are paid no less than the Living Wage.
- Otago Regional Council commits to working with the PSA to close the gender pay gap forthwith.
- Otago Regional Council monitors workloads to ensure reasonable sustainability.
- Retaining all existing service provision in-house.
- For any improvement in efficiency and effectiveness of services, reaching out to operational staff in anyway that is consistent with industrial democracy.
- Resisting any campaign to divest public assets.
- Resisting any campaign for service cuts.
- Acting now to support effective climate action.
- Ensuring funding to support the maintenance of real wages and conditions of work.

Jon Henning
Local Government Organiser, PSA

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027 491 5148

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6th May 2022

Queenstown Lakes Climate Reference Group

To whom it may concern,

SUBMISSION TO THE OTAGO REGIONAL COUNCIL ANNUAL PLAN

Thank you for the opportunity to present this submission on the ORC Annual Plan.

The Climate Reference Group (CRG) was established as an independent, multidisciplinary, and regionally representative team to offer expert advice and support to Council on the Queenstown Lakes Climate and Biodiversity Plan. The group has worked to evaluate best practice in Aotearoa New Zealand and globally, to identify key challenges and recommend priority action areas for the Queenstown Lakes District Council.

This submission outlines recommendations for the ORC Annual Plan relating to the following subject areas:

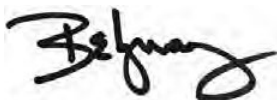
- Commitment to current deliverables agreed in the 2021-2024 LTP
- Establishing a foundation for regional climate action leadership
- Commitment to greater collaboration with TAs, Iwi and community stakeholders to achieve objectives

The CRG also recommends two actions:

- Moving from planning and report writing to implementation
- Establishing a Climate and Biodiversity Action Plan to oversee projects and action points

Representatives from the CRG would like to be heard at any hearings that result from this consultation process.

Ngā mihi



Bridget Legnavsky

Chair, Queenstown Lakes Climate Reference Group

1 Commitment to current LTP deliverables

- 1.1 Ensure the spend already allocated to biodiversity and climate implicating actions as part of year two of the LTP is maintained. In particular ensure targets are met as outlined in the plan and that all commitments to strategic direction are maintained on non-RMA plans such as biodiversity, and climate change. These include:
- Progress towards Integrated Catchment Plans is achieved as outlined in LTP.
 - Regional GHG inventory is completed and reported to council by June 30 as outlined in LTP.
 - Promised Levels of Service and reporting on regional climate change collaboration are not reduced.
 - Maintain commitments to compliance monitoring, incident response, investigations and enforcement and any extra FTEs required to deliver agreed service. This will ensure responses to environmental pollution, or breaches of environmental standards are quickly remediated and mitigated.
 - Air Plan, Coast Plan – no delays are acceptable to the Climate Reference Group.
 - Continue and increase work with community groups, stakeholders and land managers to promote good environmental outcomes – this requires more people on the ground and funding to keep programmes operating at agreed levels of service. For example, the transition towards integrated catchment management (ICM) and biodiversity initiatives. In year two ICM alone requires an additional three FTEs. Ensure these appointments are budgeted for and made.
 - Continue to increase work in biosecurity management – particularly pest control. Pest action joint projects scoped last year must be developed and progressed against milestones, and reported priority actions undertaken and achieved.
 - Continue the increase of science capacity and build on the progress made in year 1 of the plan towards further understanding our environment and the risks to it. Again, this requires adequate staffing to particularly monitor environmental change.
 - Maintain work on developing the Otago Lakes Strategic Plan and ensure any staffing required is committed.
 - Ensure the promised three site specific action plans for selected degraded waterbodies are developed, prioritised and implemented in 2022/23 year. Ensure other site-specific projects including Lake Hayes are progressed.
 - Ensure the promised monitoring programme for indigenous biodiversity ecosystems is developed and reported to council as per year three of the LTP and that actions listed in the biodiversity action plan are prioritised and progressed.
 - Ensure Air Plan issues and options papers are developed and scoped.
 - Natural hazards, flood protection and river management adaptation programmes should all continue as specified.
 - Public Transport investment that meets the outlined targets is maintained or increased.
- 1.2 In delivering its LTP, ORC as an environmental advocate should be implementing change, not just overseeing it, monitoring it and/or writing reports. The CRG would like to see policies grounded in action and developed through active and visible collaboration with its communities. In general, communities need to be empowered towards achieving the climate (mitigation and adaptation) and biodiversity gains which the ORC is responsible for.

2 Establishing a foundation for regional climate action leadership

- 2.1 Acknowledging the ORC Biodiversity Plan and Action Plan, the Climate Reference Group recommends this be broadened into a regional Climate and Biodiversity Action Plan with its own governance committee to oversee projects and account for action point delivery.

3 Specific Annual Plan responses

- 3.1 Pg 4:- *“Reprioritising existing expenditure tagged to developing the Land and Water Plan to complete an economic assessment of Otago’s natural fresh water”*. The Land and Water Plan is of highest priority and should not be delayed or underfunded because of the economic assessment.
- 3.2 Pg 10:- *“LOS: Collect information on Otago regional wellbeing (economic, social, cultural, and environmental) and identify significant issues. LOS: Collect and make publicly available accurate, relevant and timely information on climate change in Otago”*. Given the wealth of information already available, a gap analysis and an implementation plan should be considered.
- 3.3 Pg 11:- *“LOS: Lead a regional approach to climate change in partnership with local councils and iwi. Complete an annual report on regional climate change collaboration and report to Council”* Otago NGOs, Iwi & TLAs should already be collaborating on climate-related initiatives, but a report on collaboration is supported as it may drive much needed improvement in this area. However, the CRG suggests that the scope of the Report be expanded to include reporting on collaboration with TAs, Iwi, community groups, scientists, educators and other stakeholders across the region. It should also detail collaborative actions to mitigate and adapt to climate change. An example of collaboration would be working with QLDC on the Grow Well | Whaiora Spatial Plan. This work must include instigating climate change mechanisms through mitigations such as behaviour change and adaptations through technology.
- 3.4 Pg 15:- *“Environmental management is at the heart of what the regional council does. Our focus is to enhance the overall effectiveness of environmental management by:*
- *Continuing the review of our regional plans (for water, air and coast), while still working with community groups, stakeholders and land managers to promote good environmental outcomes.*
 - *Increasing our level of work in biosecurity management*
 - *Continuing to promote well-coordinated and cross-agency biodiversity initiatives across the region*
 - *Transitioning towards integrated catchment action planning, to improve what we do and the results achieved for freshwater, land, the coastal environment, or ecosystems*
 - *Increasing our science capacity with a focus on environmental monitoring to better inform our regional planning and understanding of Otago’s natural resources.”*

This is core work for ORC as outlined in the RPS ECO-M6:

ECO-M6 – Engagement: Local authorities, when implementing the policies in this chapter, will:

- (1) work collaboratively with other local authorities to adopt an integrated approach to managing Otago’s biodiversity across administrative boundaries,*

- (2) *engage with individuals (including landowners and land occupiers), community groups, government agencies and other organisations with a role or an interest in biodiversity management, and*
- (3) *consult directly with landowners and land occupiers whose properties potentially contain or are part of significant natural areas.*

The CRG asks that ORC sets examples for TAs. It needs to continue to build its science capacity and while monitoring is important, implementation of and investment in real-world projects is essential. A specific Climate and Biodiversity Committee could oversee implementation and investment.

- 3.5 Pg 16: - *“Land and Water”* Key projects such as development of the Otago Lakes Strategic Plan and the three specific waterways remediations must be maintained and even expanded. At a minimum, it’s essential that work planned in this year is carried out so that there is no delay later in the 10-year plan cycle.
- 3.6 Pg 20: - *“Biodiversity and Biosecurity”* Both biodiversity and biosecurity are critical to environmental sustainability and improvement for the future. They play a crucial role in the sequestration of carbon to offset climate warming by preventing ingress of unwanted diseases and pests, and by promoting development of indigenous vegetation communities with far longer sequestration outcomes and monocultural issues than is possible with most exotic species. ORC’s stance against carbon offsetting farms needs to be strengthened with meaningful action. We recommend that the ORC work with communities, TAs and central government to achieve a ban on OIO acceptance of international involvement in this practice.
- 3.7 Pg 22: - *“LOS: Collaborate with iwi, DOC and other key organisations to develop, coordinate and deliver a programme of actions to enhance indigenous biodiversity. Actions listed in the Biodiversity Action Plan (BAP) are prioritised and progressed.”* This LOS is fully supported. As a wider community we need to endorse the qualities of indigenous flora & fauna in our environment and this will be best achieved through collaboration.
- 3.8 Pg 35: - *“Regional Land Transport Plan. By statute, the Committee is responsible for the preparation, review and implementation of the Regional Land Transport Plan. It shapes decisions and actions about Otago’s land transport system and reflects central government’s strategic direction...”*: The Climate Reference Group supports stronger, bolder action on transport emissions reduction and asks ORC to consider freight as well as passenger transport in achieving reduction. While motor power may gradually shift away from ICE in favour of EVs, biofuels and possibly Hydrogen, vehicle numbers and congestion on our state and local roads are not likely to decrease. A step change towards public and active transport is required and it needs to begin now. We do not support a reduced level of service; if communities are not utilising services more needs to be done in terms of collaborating with territorial authorities to drive behaviour change.

Office of the Mayor

13 May 2022

Via Email

To whom it may concern,

SUBMISSION ON THE OTAGO REGIONAL COUNCIL DRAFT ANNUAL PLAN 2022-2023

Queenstown Lakes District Council (QLDC) would like to thank the Otago Regional Council (ORC) for the opportunity to present its submission on its Annual Plan 2022-23. As one of the taonga of the district, the continued inclusion of the rehabilitation of Lake Hayes is very much appreciated. QLDC looks forward to a programme of improvement that will restore both the amenity and ecological value of this lake.

QLDC notes that there are few significant changes in the draft Annual Plan 2022-23. This submission includes comment on some key issues relevant to the district, including air quality in Arrowtown, adaptation pathways in Glenorchy, emergency management, public transport and climate change. A common theme across all of these is the desire to continue to build a collaborative partnership with the ORC to achieve good outcomes for the district's communities. QLDC will continue to partner with ORC including through the Grow Well Whaiora partnership, of which ORC is now a member.

QLDC welcomes a closer working relationship with ORC through the changing landscape of local and regional government due to central government reforms.

It should be noted that due to the timeline of the process, this submission will be ratified by full council retrospectively at the next council meeting.

QLDC would like to be heard on its submission.

Yours sincerely,



Jim Boulton
Mayor



Mike Theelen
Chief Executive

1.0 Introduction

- 1.1 QLDC appreciates the challenging environment but the areas we have identified remain an imperative for our communities and therefore QLDC is supportive of the proposed rates rise as agreed in the LTP. We respect that setting an increase in rates is challenging for local government the breadth of the nation, but we strongly urge the ORC to show leadership in ensuring these critical projects remain fully funded.
- 1.2 QLDC strongly supports the ORC's focus on climate change and extends an offer of support and collaboration in building a shared understanding of its implications for our communities. It is essential that our residents experience a unified sense of urgency, clarity around initiatives and easily accessible data. The Council acknowledges and supports the submission of the Queenstown Lakes District Council Climate Reference Group.
- 1.3 The community vision for the Queenstown Lakes District places a significant focus on the reduction of emissions and the protection of the environment¹. It has never been more important for local and regional authorities to operate in partnership, as good environmental health is essential to the wellbeing of our communities.
- 1.4 QLDC welcomes ORC to the Grow Well Whaiora partnership and looks forward to working together on the Future Development Strategy for the district.

2.0 Continued inclusion of funding for the rehabilitation of Lake Hayes

- 2.1 QLDC thanks the ORC for the continued inclusion of the rehabilitation of this body of water in its Annual Plan and looks forward to engaging with the ORC in relation to the methodologies and timelines proposed for flushing, de-stratification and capping.
- 2.2 It is noted that Lake Hayes is an important component of the lakes and waterways that characterise the district's unique landscapes. It's therefore important that the rehabilitation is undertaken at a scale that is commensurate with its importance to the district.

3.0 Environment and biodiversity

- 3.1 QLDC has concerns over the delay of air quality programmes into Year 3 and urges ORC to consider progressing this programme in Year 2. Air quality remains a health concern and an important consideration in parts of our district, particularly Arrowtown (Air Zone One). Submissions to the QLDC Ten Year Plan demonstrated significant appetite in Arrowtown to continue progressing air quality programmes at pace. This is an active concern to residents and the community association in Arrowtown.
- 3.2 There will be important opportunities within the next two years for the continued advancement of the Air Quality Strategy, in which the ORC's leadership will be essential.
- 3.3 A shift in public awareness and central government mandates around the use of wood and coal fire heating will likely create momentum around the electrification of space heating. QLDC looks forward to partnering with the ORC and Public Health South to deliver good health outcomes for our communities.

¹ Vision Beyond 2050 <https://www.qldc.govt.nz/your-council/our-vision-mission#:~:text=Vision%20Beyond%202050&text=This%20progressed%20to%20a%20group,and%20representation%20from%20Central%20Government.>

- 3.4 However, this issue is also increasingly complex in terms of energy resilience. In a highly seismic area with a very cool climate, neighbourhoods that solely rely on electric heating may lack resilience in the event of power disruption during winter.
- 3.5 Complete reliance on electricity in the context of an unreliable network and cold alpine climate presents a challenge to the welfare of the district's residents. Whilst QLDC is pursuing the challenges of the electricity network via other channels, QLDC encourages ORC to help lead the investigation into low emission fuel burning technologies. These will help to provide alternatives to electrification in the short term.
- 3.6 Both biodiversity and biosecurity are critical to environmental sustainability and improvement for the future. They play a crucial role in the sequestration of carbon to offset climate warming by preventing ingress of unwanted diseases and pests, and by promoting development of indigenous vegetation communities. QLDC recommends that ORC further invests in the biodiversity and biosecurity of the district and in particular, dedicate funding and resource to key actions in the QLDC Climate and Biodiversity Plan in this area.

4.0 Resilience, Natural Hazard Management and Emergency Management

- 4.1 The QLDC supports the changes to increase the full-time equivalents in the emergency management team to maintain service levels. Community resilience remains an imperative in the district, given the revised scientific forecasts for an AF8 earthquake. This, combined with the very real risk that Climate Change brings to the potential for natural disasters, necessitates the ORC to continue its investment into the district's emergency preparedness
- 4.2 The QLDC has an active interest in the NEMA reform programme that is currently in progress to modernise the emergency management system. Given the potential consequences of this reform programme on the future of both group and local emergency response management, QLDC requests that ORC proactively engages with QLDC to develop aligned positioning, integrated planning and timely information sharing to support the successful implementation of any legislative and system changes.
- 4.3 QLDC would like to acknowledge the ORC Natural Hazard team and its leadership in driving forward key climate adaptation work programmes in the district. The Glenorchy 'Head of the Lake' project in particular is a major undertaking which has received national recognition within the recently released draft National Adaptation Plan. This project utilises an adaptive pathways approach to support community-led decision making around the hazards that border the township. The QLDC looks forward to continuing its partnership with ORC, iwi, DOC and community stakeholders in the delivery of this important project.
- 4.4 QLDC also requests that ORC continues to provide resourcing support and subject matter expertise for other natural hazard projects across the district. These projects include but are not limited to the Gorge Road Alluvial Fans project and new risk reduction projects associated with wildfire risk (e.g Mt Iron).

5.0 Public Transport and Active Travel networks

- 5.1 The provision of effective public transport in the district is of significant importance to the Queenstown Lakes District, with significant investment planned for the public transport interchange on Stanley Street in Queenstown.

- 5.2 Transport is the highest source of greenhouse gas emissions in the district, with transport accounting for 45% of gross emissions². The ORC needs to recognise its role in the development of a strategic programme to counter this and help target net zero carbon emissions by 2050 as per the Climate Change Response (Zero Carbon) Amendment Act. In its draft Climate and Biodiversity Plan, QLDC has proposed a commitment to a 1.5°C Science Based Target pathway. This requires a 44% reduction in carbon emissions across the district by 2030 which cannot be achieved without transformative investment in public transport and active travel networks. QLDC will continue to work with ORC through the Grow Well Whaiora Partnership to complete and implement a mode shift plan for the district to encourage the use of public transport and active travel.
- 5.3 QLDC encourages ORC and Waka Kotahi to move beyond the paradigm of a demand-led public transport provision, into an approach that drives behaviour change through the provision of effective, customer centric public transport solutions that align with the needs of our communities. This will include routes that reflect travel pattern demands, provide faster travel than by private vehicle, significantly reduce emissions and provide affordable intercity and regional connections.
- 5.4 The Council is particularly concerned that the opportunity to plan towards the early introduction of public transport services new growth areas such as Ladies Mile cannot afford to be overlooked or simply left until demand grows. Public transport advocates clearly highlight the benefits of creating the mindset towards public transport, but this requires innovation and courage to make that early investment. The council continues to urge ORC to seize the opportunities presented by the master planning work that now guides and shapes future urban development across QLDC and to capitalise on that early planning.
- 5.5 During the QLDC Ten Year Plan, Climate and Biodiversity Plan development and recent Annual Plan process, the district’s communities communicated a strong demand for enhanced public transport across the Wakatipu basin and for the provision of public transport in the Upper Clutha. In the Regional Public Transport Plan (RPTP) there was a proposal to run a public transport trial in the Upper Clutha, but the funding for this was then removed in the Long Term Plan. We request that the ORC reconsider this and allocate funding to this in the 2022-2023 Annual Plan as a matter of urgency
- 5.6 However, the provision of more fossil-fuel powered public transport will not provide a low-emissions long term solution. QLDC encourages ORC to work with Waka Kotahi to take a more ambitious approach in building an innovative, low-emissions solution for the region. Hydrogen and electric models could offer a bold, progressive step towards emissions reduction and a clear signal of the ORC’s commitment to climate action across the region. Similarly, the ORC should be open to accommodating innovative trials of alternative non-road based technologies such as ferries and gondolas.

6.0 Regional Leadership

- 6.1 QLDC welcomes every opportunity to partner with the ORC in relation to climate change and to build on the work that is already underway. Efforts to collaborate in the development of a consistent approach to data and emissions measurement are already in progress.
- 6.2 QLDC encourages the ORC to ensure sufficient funding and resources are in place to continue to build this relationship and develop a consistent, authoritative data set.

² [otago-region-ghg-profile-report_v4.pdf \(orc.govt.nz\)](#)

- 6.3 QLDC would like to thank the ORC for its representation on the QLDC Climate Reference Group. The quality of the expertise and insights provided by this group has been notable and is helping the QLDC to determine its priorities in relation to climate action.
- 6.4 It should also be noted that QLDC has partnered with the Regional Tourism Organisations to begin the development of a Destination Management Plan for the district. In the near future, QLDC will work with ORC to understand its role in the process.

**Submission from Richard Bowman to the Submission on the
ORC 2022-2023 Annual Plan**

I wish to make a submission on the Otago Regional Council's Annual Plan for 2022-2023.

I also wish to be heard by Council as part of the Annual Plan public consultation process when hearings are held.

Funding

I endorse the Council's intention to continue with the funding targets set in the Long-term plan last year. As such I am prepared to accept an 18% increase in my rates providing the additional funding is used effectively to promote the sustainable management of our natural resource base.

It is essential that the projects identified in the LTP which are now underway can be progressed and taken to completion.

The committed funding is also required to ensure that staff capability and capacity continues to be increased to allow the ORC organisation to meet the expectations of the regional community for improvements in environmental values – particularly in water quality and the reduced impacts of pests.

Lake Hayes Water Quality

I have been very pleased to see the initiation and operation of the Wai Whakaata/Lake Hayes Strategy Group over the past year. At last, we have a forum involving stakeholders and agencies which can constructively address the many issues around improving the water quality in Lake Hayes. ORC staff must be applauded for the thorough work they have done to facilitate the Strategy Group and for their continuing support of it. Since its inception we have seen a significant improvement in relationships between the parties involved with the lake and a willingness to work together to achieve common goals.

In particular there is now clarity on the improvements needed to the culvert under SH 6 and a funded plan to see solution in place by the summer of this year. This will be a major milestone for Lake Hayes which will not only help with the reduction in nutrient levels but will also assure year-round, flood-free access along the Lake Hayes track at the SW end of the lake.

Outstanding issues have now been identified around the proposal to augment flushing flows through Lake Hayes by using surplus water from the Arrow Irrigation Scheme. It is hoped that these can be resolved satisfactorily to allow additional flows through the Lake in the not-too-distant future.

The Strategy Group is in a strong position to coordinate the support for the Vision Lake Hayes catchment remediation project which is now being implemented by Mana Tahuna. Already funding of \$4.5M has been obtained for this integrated catchment management programme and riparian planting work is underway. The commencement of the more substantial construction of wetlands and sediment traps is currently awaiting the granting of a resource consent from ORC.

At present excellent progress is being made with initiatives to improve water quality in Lake Hayes. This has been facilitated in large part by ORC being able to play an active role in developing effective working relationships between with community stakeholders and the agencies with statutory and management responsibilities. I sincerely hope that this contribution from ORC will continue and grow in the future to achieve the outcomes we are all seeking for Lake Hayes.

Wilding Conifers

Since the adoption of the LTP ORC has started to increase its active participation in the national Wilding Conifer Control Programme projects in the region. Currently much of this input is to support the administration of the Council's role as the Fund Manager for the programme in Otago. There is, however, considerable scope to increase the scope of its activities. There is a strong need to communicate the importance of wilding conifer management to affected land holders and to encourage their active participation of the programme. There is also a need to promote the objectives of the Regional Pest Management Plan in respect to wilding conifer management and understanding of the regulatory aspects of the Plan. More resourcing is definitely needed in this area to create a sustainable regime for the long-term management of wilding conifer issues in the region. Without this sort of input today there is significant risk that the spectacular gains made in recent years under the national programme will be lost. This will happen if land holders do not fully support the initial removal of wildings and/or in future are unwilling to accept responsibility for any long-term maintenance that is required to prevent reinfestation of their land.

Rabbit Management

There have been several meetings regarding rabbit management around Lake Hayes held by ORC as well as the setting up of a small coordinating committee. ORC staff have also conducted rabbit inspections on the land around Lake Hayes and have consulted many of the landowners. So far these efforts do not seem to have generated much widespread enthusiasm for coordinated rabbit management across property boundaries. However there does appear to be more rabbit fencing of individual properties going on in places which is a good start. Although uptake from landowners is slow it is important that ORC maintains the public and targeted land holder consultation to slowly and patiently persuade them that fencing and coordinated control across properties is the best solution to their problem. It will help when QLDC and DOC start to carry out control on the large areas of public land they manage around the Lake.

Staff involvement

It is good to see that ORC is steadily building its staff numbers and in particular those who interact directly with stake holders and communities. This has been apparent to me at a number of public meetings and events I have attended over the last year. It is essential that ORC field staff are actively engaged with communities in activities such as native restoration plantings, water quality issues, rabbit management, wilding conifer control, etc. By doing so they are not only raising the profile of ORC in places where this has been virtually non-existent in the past but also creating relationships which will be the key to resolving complex environmental problems on the ground in future. I hope that this trend continues, and that ORC staff are seen as valued and essential partners of communities working together for mutual benefit on environmental projects.

Richard Bowman

4 May 2022



Submission to 2022-3 Otago Regional Council Annual Plan
on behalf of the
Southern Lakes Sanctuary

We wish to speak at the hearings

We write in support of the central tenets of the Annual Plan and focus on the following key themes

- 1. To signal the formal creation of the Southern Lakes Sanctuary, a predator free sanctuary, which encompasses the whole of the Queenstown Lakes District.**
- 2. To encourage ORC to budget for becoming a partner in the SLS project in a manner similar to PF Dunedin so as to allow the SLS to be able to match funding with PF2050 Ltd and increase eradication work in Otago.**
- 3. To thank the ORC for its support of the Conservation Standards Training.**
- 4. To encourage the ORC to amplify its work in biodiversity through increased partnership activity with the Southern Lakes Sanctuary and other local conservation groups in a concerted and joined up way which goes well beyond the well-meaning but unstrategic approach of the Ecofund.**

Background:

Biodiversity is critical for maintaining healthy, functioning ecosystems. Biodiversity loss has five key drivers, all related to human activities; climate change, changes in land and sea use, exploitation, pollution and the introduced invasive species.

Aotearoa has approximately 4000 species threatened or at risk of becoming extinct, or 80 per cent of our reptiles, frogs, bats and birds (Environment Aotearoa 2019) and we have the highest proportion of threatened indigenous species in the world. Introduced mammals, such as stoats, rats, ferrets, weasels, cats and possums have decimated our native fauna and are responsible for a wave of extinctions. Central Government has pledged to eradicate the three main threats (stoats, rats and possums) by 2050 in possibly the most ambitious conservation project in the world. This has led to a dramatic increase in community groups, and also in technology and innovation groups.

Predator Free activities in the form of trapping having been taking place in pockets of the district during the last 20 years with a significant upswing of activity in the last 8 years with the development of larger scale projects (Routeburn Dart Wildlife Trust, Matukituki Animal Pest Control Project, NZ Forest & Bird Protection Society Inc - Central Otago Lakes Branch Makarora work) community focused umbrella groups (Whakatipu Wildlife Trust, Wanaka Backyard Trapping) and private high country stations and property owners investing significantly in biodiversity gain (Soho Properties). In 2019 a consortium of these 6 partners, led by the Whakatipu Wildlife Trust and funded by DOC, QLDC, ORC, and private investors, funded a study to look at the possibility of Landscape Scale approaches to predator suppression and eradication in the whole of the Queenstown Lakes District and to explore the viability of a Predator Free 2050 bid.

Following on that report (Wildlands Report, 2020) and stimulated by Central Government's Conservation Funding in 2020, the Southern Lakes Sanctuary concept was solidified in April 2020 with the idea of turning the entirety Queenstown Lakes District into a predator-free sanctuary thus achieving one of the district's Vision Beyond 2050 goals of *Warakī: Deafening Dawn Chorus*. A successful application was made to Predator Free 2050 where in July 2020, we were offered 8 million dollars for the project, however, we were not able to accept that funding because we could not find non-crown funding to match their 1:1 funding criteria within the short time frame they required us to meet. Had QLDC and ORC been able to be our match partners, as the local and regional councils are in other PF2050 projects, we could have created jobs and fulfilled our climate change biodiversity responsibilities while fast-tracking towards both our district's and nation's ambitious 2050 goal. We spoke at great length last year with Chair Andrew Noones and Councillor Forbes about this issue as at the time ORC's inability to respond to basic discussion and requests impeded progress. **We have been assured that a better relationship awaits us in the future on this subject of relationships and ORC's staff engagement.**

Southern Lakes Sanctuary and Kaimahi for Nature:

Though the PF2050 funding became unavailable, the Southern Lakes Sanctuary Trust was officially formed in 2021 and in July 2021 received notification of being recipients of DOC's Kaimahi for Nature funding of approximately \$3 million over 3 years. This has allowed us to begin a joint job creation and conservation project designed to protect 155,960 ha of the Queenstown Lakes District from the invasive species of rats, possums, and mustelids, striving to preserve the over 30 threatened and at-risk species that are core to our biosphere.

We currently have 12 full time staff working across the district focusing on amplifying the work of our original consortium partners and building strong landscape-scale connections between and among their projects. The benefit of working at landscape scale allows us to address the true movement of predators in the landscape and apply strategies that can amplify efforts in a wide range of geographic areas more efficiently. Over the 3 year life of the Kaimahi for Nature funding cycle we will create a total of 39 FTEs, boosting their standard of living by providing a stable income for these local residents.

The consortium of 6 groups who make up the Southern Lakes Sanctuary Trust represent the mahi of over 90 community groups/projects, landowners, and businesses who have been working for many years to restore the declining biodiversity in our region. The volunteer work of these groups is valued at over \$1.8 million per annum.

Though we have begun our project under the auspices of Kaimahi for Nature, this is only the beginning. From this initial platform we are now working towards funding our larger 10-20 year \$30 million dollar project. During the three years of the Kaimahi for Nature funding we will be building the larger project, bringing in funding partners to allow us to unlock Predator Free 2050 funding, and also building strong and enduring relationships both locally and nationally. This requires us to be focused on strategic, long-term innovation and capability building in conservation; activities which are not funded under the Kaimahi for Nature arrangement.

Working at Landscape Scale

The methodology the Southern Lakes Sanctuary Trust (SLST) is applying in the planning phase of the Southern Lakes Sanctuary is grounded in the “protected landscape approach”. This approach to protected area and natural resource management seeks to integrate the conservation of nature and culture on a landscape scale, and to foster stewardship of the natural environment by the people who are living and earning a livelihood within the project area and / or accessing it for recreation and enjoyment.

A fundamental principle of this approach is to protect and enhance nature in ways that will also sustain and restore people's relationships with the biophysical environment and provide further opportunities for beneficial human / nature relationships. The approach takes into account legislative statutes and allows “working landscapes” and human settlements and transport corridors to be integral parts of the SLS. The concept also takes into account notions such as the places where people and nature meet as these, to a significant degree, are shaped by the inter-relationships between humans and their environment.

It is, therefore, these natural settings that have shaped how people live - settlement patterns, livelihoods, cultural practices and values – in essence their way of life. Protected landscapes can serve, therefore, as living dynamic models of sustainable use of land and resource use and offer important opportunities and lessons for a balanced approach to conservation, natural resource use and appropriate levels and types of development. Because it is based on an adaptive management approach, there is also significant opportunity for incorporating on-going research which seeks to improve human-nature relationships as well as providing the ability to protect, restore and enhance ecosystems.

In short it is an inclusive approach, centred around participatory processes, common vision and objectives and partnerships that draw a diverse array of stakeholders into shared stewardship and sustainability. This approach aligns with the 4 Well-Beings (social, cultural, environmental and economic which we discuss in more depth in our 2022 Annual Plan submission) which also underpin Local Government.

The Otago region benefits from two landscape scale projects. The Predator Free Dunedin project which represents 20 groups and 31,000 ha of Predator suppression and eradication projects, and the SLS which represents the mahi of over 90 smaller groups under the umbrella of 6 larger consortia members and 156,000 ha of suppression work.

We note that in the Annual Plan you only mention the work of Predator Free Dunedin in “Continued regional-scale pest and predator projects (e.g., Predator Free Dunedin)” and we ask you to widen your view and amend your understanding that our project represents

significant piece of geography in the Otago Region in that it is 5 times larger than PF Dunedin and funding support should be proportional to the scale of the project with both receiving significant funding and attention from staff.

Support for the Conservation Standards Workshop

We would like to thank the ORC for the \$11,000 of support towards the Conservation Standards workshop which will take place in May 2022.

This workshop will bring together over 75 people across the region and from Wellington to work together through an internationally recognized process for working at landscape scale so that all of the projects in the Queenstown Lakes District can begin to work together rather than in silos. We are glad to see staff members from ORC will be attending and we would like to encourage further engagement in future events and at the planning table with all of us.

Biodiversity

The Intergovernmental Panel on Climate Change (IPCC) has published several reports that have included extensive analyses of the effects of climate change on ecosystems. Of direct interest to the Otago area of interest are expected decreases in the extent of glaciers, permafrost and snow cover caused by warmer climate effect hydrologic systems. These will *inter alia* impact on soil stability and related social economic systems. Other impacts will, without doubt, include the altitudinal distribution of vegetation which is projected to progressively shift to higher elevations. A consequence of this is that some species with a climatic range limited to mountaintops will probably become extinct because of gradual habitat loss and even completely cease to exist.

Within this hypothesis is, of course, the very real threat that climate change may well take place so rapidly that some ecosystems, habitats and plant species would simply be unable to adapt and spread to higher elevations. As well, and even if they were able to spread, there remains the question whether these species could survive in these the presumably harsher annual temperature variations at such altitudes. The end result could well be extirpation within the SLS and even extinction within NZ

We believe ORC must act quickly and with far greater resource to work at landscape scale to mitigate the loss of native biodiversity in our region. By working in a more joined up way to strategically distribute funding to groups who can work together, amplify each other's work, and create far more connection with enduring outcomes the ECO fund funding could become something of strategic value. We would be willing to assist ORC in developing a more strategic approach to this funding for the region which would be more beneficial to biodiversity gains overall.

At present we believe the ORC is not doing enough to support the region's need for predator control in keeping with the speed of climate change and biodiversity loss. We encourage the council to put more resource distributed strategically to achieve far higher overall positive outcomes.

Support for the Southern Lakes Sanctuary in the 10 Year Plan

As we wrote in last year's plan submission, this still remains our position and we hope that going forward we will see more towards this.

We ask ORC to formally signal its willingness to work with us to help us to reach our true project vision which encompasses the entirety of the district, focuses on diverse and original strategies for species eradication, looks to introduce takahe, whio, and protect those species who teeter on the edge of extinction and to build resilience within the community through community-wide engagement in conservation activity.

We ask for creativity, collaboration, leadership, a true partner and clear Biodiversity ORC staffing support so that when we move forward we can work together in a supportive environment for the success of the project but also a funding partner.

When asked whose responsibility is conservation in the district, we believe the answer should be all of us. We ask ORC to lead by example here and commit to supporting the Southern Lakes Sanctuary in both the short and long term.

Ngā mihi nui,

Leslie Van Gelder, Ph.D.

Co-Chair, Southern Lakes Sanctuary

Leslie.vangelder@gmail.com

027-748-9153

Taieri Trails Trust

C/- Colin Brown, Chair

The Taieri Trails trust has been recently established to fund, build, and maintain a walking and cycling network on the Taieri Plains, linking Waihola with Mosgiel/Wingatui, via Outram and also Dunedin airport.

We have two main objectives

- Provide a safe (and flat) off road recreation opportunity for walkers, runners, and cyclists on the Taieri plains.
- Complete the loop – Link the Clutha Gold trail (finishing in Waihola) to Mosgiel and Dunedin City, thus enhancing the value of the existing network of trails in Otago.

Various studies of the economic and social benefits of such trails have been well proven, are multi-faceted, and substantial.

It is obvious from the initial study of options, that being able to use the Taieri and Silverstream floodbanks for a large part of the trail has many advantages.

We also know that many of the farmers through which such a trail would travel are sympathetic to the concept of the floodbanks being used for this purpose.

We also note that portions of the floodbanks are already being used for recreational purposes, in particular the Silverstream adjacent to Mosgiel, but also elsewhere by walkers and for fishing access.

Accordingly, with reference to the section of the annual work plan for "**Flood protection, drainage and river management**",

- *"improved asset management planning is necessary to see how change impacts the service, and decisions facing Otago communities"*

We suggest that the "*Taieri and Clutha flood protection scheme reviews*" work should include giving consideration to how the management of the Taieri Floodbanks could be modified to provide for improved recreational access by walkers and cyclists, while still recognising the rights of lessee's interests.

In effect,

- provide for recreation access to the floodbanks
- identify where there are constraints to that occurring
- the action steps required to address those constraints
- and the specific locations where public access should not be permitted



6 May 2022
Otago Regional Council
Private Bag 1954
Dunedin, 9054

Submission the 2022/2023 Annual Plan

This Submission is provided on behalf of the Otago Fish & Game Council (**Fish and Game**). For additional information please contact Nigel Paragreen using the details below.

Submitter Details

Submitter: The Otago Fish & Game Council
Contact person: Nigel Paragreen, Environmental Officer
Email: nparagreen@fishandgame.org.nz
Office phone: 03 477 9076
Postal address: PO Box 76, Dunedin 9016

A handwritten signature in black ink, appearing to read 'N. Paragreen', positioned above a horizontal dotted line.

6 May 2022
.....

Introduction

1. Fish and Game is the statutory manager of sports fish and game bird resources within Otago. It holds functions and responsibilities set out in the Conservation Act 1987. The organisation's functions include managing, maintaining and enhancing the sports fish and game resources of Otago in the recreational interests of anglers and hunters; representing the interests and aspirations of anglers and hunters in the statutory planning process; and advocating the interests of the Council, including its interests in habitats. This submission has been developed in line with these functions.

A long history of environmental and policy failure

2. To understand the issues raised in this submission, it is critical that they are placed within a historical environmental and policy context.
3. Anglers and hunters have a long history with the Otago environment. Fish and Game, and the Otago Acclimatisation Society which proceeded it, have been working in environmental fields for over a century – longer than most European institutions in the region.
4. In this time, the quality and scale of water bodies in the region has diminished greatly. Research clearly indicates that the main cause of this degradation arises from land use

Statutory managers of freshwater sports fish, game birds and their habitat

Otago Fish & Game Council

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www.fishandgame.org.nz



changes,¹ however, I do acknowledge the impact that the introduction of trout and salmon have had on native aquatic species.

5. As it stands currently, many water bodies in Otago are degraded. For example:
 - a. The mean allocation sought for deemed permit applications that Fish and Game was an affected party to in the lead up to 2021 was 522% of the 7-day mean annual low flow (MALF), with the mean residual flow from the same dataset being just 24% of MALF.² Emerging general guidance suggests that these are magnitudes higher than the levels required to ensure abstraction does not cause ecological degradation. With Plan Change 7 essentially rolling over surface water consents for the short term, it is prudent to expect current allocations are similar to these figures.
 - b. 63%³ of all State of Environment monitoring sites in Otago did not meet one or more national bottom lines from the National Policy Statement for Freshwater Management 2020. In some rohe this number was much higher, such as:
 - i. 100% of sites were below a national bottom line in the lower Clutha rohe;
 - ii. 88% of sites were below a national bottom line in the in Dunedin & Coast FMU; and
 - iii. 87% of sites were below a national bottom line in the in the North Otago FMU.
6. Some of these issues have developed recently, others have been around for a century. Water quality issues, particularly in the lower Clutha rohe, are relatively recent and Fish and Game's experience is that they have arisen with the increased prevalence of intensive land use in the last few decades. The significant impact of deemed permits have been long observed but they were supposed to have been resolved within the Resource Management Act system, with its aim of sustainable management, by 2021. This is yet to be completed.
7. For many years, particularly in the 2000's and 2010's, the ORC has invested just a fraction of what it should have in the fields of policy; freshwater science; and community and stakeholder engagement. Years of such underinvestment have benefited residents by keeping rates low but have meant that the ORC stayed behind the curve in terms of knowledge about the region's water bodies, developing policy to tackle issues and relationships with communities and stakeholders to implement solutions.
8. It is now broadly recognised that the Regional Plan: Water for Otago (RPW) is out of date and ill-equipped to implement modern central government policy. In recent years, three present

¹ Joy, M., & Death, R. (2004). Application of the index of biotic integrity methodology to New Zealand freshwater fish communities. *Environmental Management*, 415 - 428.

² Plan Change 7 Evidence in Chief of Nigel Paragreen, paragraph 83

³ Otago Regional Council. (n.d.). *State and Trends of River and Lake Water Quality in the Otago Region 2000 - 2020*. Dunedin: Otago Regional Council. Retrieved April 1, 2022, from <https://www.orc.govt.nz/media/9781/state-and-trends-of-lake-and-river-water-quality-in-the-otago-region-2000-to-2020.pdf>

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or past Environment Court judges have commented on the inadequacy of the RPW, including that it makes barely any effort to manage water volumes,⁴ provides no direction on environmental outcomes⁵ and is not fit for purpose.⁶

9. Environmental outcomes in Otago's water bodies are poor and the policy regime guiding decisions is not fit for purpose. A massive effort will be required by all to make it right – the ORC and Fish and Game included.

A path forward

10. Combined, the Essential Freshwater Package and the ORC's agreed workplan with the Minister for the Environment provide a potential pathway to resolve the significant issues facing Otago water bodies.
11. The development and implementation of a Regional Policy Statement and a Land and Water Regional Plan, properly focused on the concept of Te Mana o te Wai and meaningfully restoring degraded ecosystems, should be a priority.
12. Fish and Game supports this pathway and implores the ORC to resource it adequately. Given the amount of work required in short timeframes, it is clear to Fish and Game that even the level of resourcing envisaged in the Long Term Plan may not be enough. Cutting resourcing from these work streams will risk critical environmental work and simply add to the burden of historic underinvestment, making it more difficult and costly for future generations to tackle the issues.

A difficult decision

13. Fish and Game acknowledges that correcting Otago's historical underinvestment is occurring at a time where people are already facing cost of living pressures. The increased rates required to fund critical historical science, policy and community engagement may cause difficulty for some households. This year, it will be exacerbated by high inflation rates.
14. For these reasons, Fish and Game understands that Councillors are considering reducing the resourcing available and reducing the rates burden.
15. Fish and Game urges Councillors against the impulse to consider the decision as trading off economic and environmental outcomes. This is a false dichotomy, as the economy is

⁴ *Lindis Catchment Group Incorporated v Otago Regional Council* [2019] NZEnvC 166 at paragraph 3.

⁵ *Otago Regional Council* [2021] NZEnvC 164 at paragraph 321.

⁶ Skelton, Peter. 2019. *Investigation of Freshwater Management and Allocation Functions at Otago Regional Council*.

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ultimately reliant on the goods and services provided by ecosystems. Poor environmental outcomes eventually translate into poor outcomes for humans.

16. To be clear, Fish and Game does not take a specific position on whether rates should rise. It's interest lies in ensuring that the ORC is funded to undertake its functions effectively.
17. Cost of living concerns associated with rates rises will be immediately relevant for some segments of society, particularly those on lower incomes or lower levels of wealth. If this is of concern to Councillors, Fish and Game suggests targeting rate increases so that the burden is placed away from the financially vulnerable and upon those who can afford to pay.

Conclusion and relief sought

18. Thank you for the opportunity to submit on the plan.
19. Fish and Game seeks that:
 - a. the ORC corrects its historic underinvestment such that water bodies are protected, and restored where degraded, within a generation; and
 - b. the funding required to contribute towards this goal in this annual plan is provided in full.
20. To ease cost of living concerns, should they arise, Fish and Game suggests targeting rate increases so that the burden is placed upon those who can afford to pay.

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Unions Otago submission to the Otago Regional Council April 30, 2022
It has been three years since Unions Otago led a petition which was submitted to this council with 514 signatures asking the Ōtago Regional Council to fund and require all its suppliers and contractors to pay the Living Wage to their workers.
Immediately after the petition was handed in, an election was held and a majority of elected councillors, 8 out of 12, declared their support for the proposal.
Since then, progress has been underwhelming. Bus drivers were given the Living Wage but seemingly this was only begrudgingly given after the longest delay conceivable.
Now it has been made clear to bus drivers that the finding for an increase to Living Wage was a one-off and no further increase is budgeted for. Therefore their wages are destined to be eroded by inflation and fall below future Living Wage increases.
Furthermore, it seems no progress has been made to ensure a living wage is paid to the many other workers employed in fulfilment of ORC contracts, such as bus cleaners, pest destruction workers, flood protection workers or the many other activities funded by the council. The management culture of “contracting out” to avoid paying decent wages, which bears so much responsibility for the gross rise in inequality in Otago is apparently still embedded in the Otago Regional Council.
It is always difficult to swim against the tide. In this case, to muster the necessary boldness to do what needs to be done even though it runs against the free market philosophy that remains institutionally entrenched in the public sector despite being so peculiarly ill-suited for the purpose. Equally corrosive of the respect in which the public sector is held is the failure of elected officials to honour promises. The excuse so often given - fiscal responsibility - is no excuse at all. Indeed, it too often provides cover for the reckless failure of councils to provide the necessary investment to maintain physical infrastructure and workforce continuity.
It is imperative the council redouble its efforts to make the living wage a rule and not an exception for council workers - employees and contractors.
Andrew Tait Convenor, Unions Otago

Finance Committee 2022.06.01 (AP Deliberations)



**Submission to Otago Regional Council proposed Annual Plan 2022-23
Whakatipu Wilding Conifer Control Group Incorporated (WCG)
4 May 2022**

Summary

- WCG, established in 2009, is a community-led volunteer group, with highly skilled executive members who are community leaders and experts in their field, coordinating the wilding conifer control efforts and obligations of agencies, landowners/managers whilst also engaging with the Whakatipu community.
- Wilding Conifers pose a threat to the golden Whakatipu tussock landscape, to native ecosystems, to historical areas including Council and DOC Public Conservation Land, to tourism and recreational areas and to waterway yields (Independent analysis suggests wilding pines have a strong impact on waterways - wilding pines can decrease the amount of water that flows into rivers by 30% to 40%). Wilding Conifers also pose a dangerous fire hazard to the community.
- ORC is the lead agency in recognising and addressing the large wilding problem in Otago and has previously funded \$100,000 per annum to WCG, where, as a volunteer-run charity organisation, WCG can further leverage these funds into much greater sums.
- Other Whakatipu environmental community groups also support and endorse the work of WCG and recognise that their conservation efforts are interlinked with the detrimental effects of the exponential growth of wilding conifers/pines. If WCG fails in its control efforts, then local environmental groups are also likely to fail in their objectives.
- Continued ORC financial support to WCG will help preserve our unique biodiversity and landscapes, create and maintain jobs, retain recognised values and benefit the Otago community as a whole.

1. **ORC is the lead agency, and the current Otago Regional Pest Management Plan (RPMP) recognises and addresses the large wilding conifer problem in Otago.**
 - 1.1. Wilding Conifers are included in the new Otago RPMP under the progressive Containment programme - “to contain or reduce the geographic distribution of the subject, or an organism being spread by the subject, to an area over time.”
 - 1.2. “The ORC Biodiversity Strategy outcomes seek to reduce the impact of pests on indigenous species, provide more pest management information and **support community-led initiatives.**”
 - 1.3. The Otago Regional Policy Statement contains policies and methods to encourage, facilitate and **support activities** which control pests.
 - 1.4. WCG would like to see ORC continue building on wilding control education in the community to support and enhance the efforts of WCG.
 - 1.5. The WCG recognise that the ORC represents the WCG at a National level as a fund holder for the National Wilding Conifer Control Programme (NWCCP) and attends the NWCCP Operational Advisory Group. ORC hold funding from the Ministry of Primary Industries (MPI) to pay into the Wilding Control program in the Whakatipu. WCG acknowledge the increased ORC involvement with DOC and WCG in the planning and understanding of operational work and appreciate the good work of the ORC team.
 - 1.6. WCG encourage ORC advocating, through the National Wilding Conifer Control Programme - Operational Advisory Group for National funding to continue to fund all Whakatipu Management Units and to prioritise the message “A stitch in time saves nine” where funding allocated now means future funds saved.

2. **Continue financial and other support from ORC for wilding conifer control programmes in Otago/Whakatipu.**
 - 2.1. In the 2021/22 financial year, ORC contributed \$100,000 of funds to WCG for wilding conifer control in Otago through a targeted rate. WCG thanks ORC for this financial support towards the WCG Control Programme.
 - 2.2. The Wilding Pines Uniform Targeted Rate must remain in place with the ability to increase this if other areas in Otago come on board and coverage expands as planned in the Annual Plan. Ongoing investment is required to maintain past wilding control

gains and ongoing growth of the programme is needed as Ministry of Primary Industries (MPI) funding may fluctuate after initial COVID funding boosts.

- 2.3. While the wilding control programme currently has substantial funding, WCG reiterates that to draw down the MPI funding, WCG and landowners are first required to commit a substantial contribution towards much of the control work.
- 2.4. Further, the funding from MPI has specific rules and funds are only to be used for wilding conifer control, these funding rules do not include expenditure on WCG annual expenses including WCG financial and risk management, other management, operational costs and resources, forestry plans and various other management plans required for removal. You will appreciate that as both the control budget and inflation increase, so too have the expenses of running the control programme.
- 2.5. As previously commented on in our LTP submission, ORC proposes to develop a Regional Wilding Conifer Management Strategy in the LTP. WCG has budgeted for and is in the process of developing a new strategy document which will be a valuable resource for ORC and less outlay will likely be required by the ORC to produce another strategy for Whakatipu.
- 2.6. ORC state that they wish to implement the Regional Pest Management Plan with improved IT systems and work practices including inspections and compliance checks. WCG wish to build on our successful collaboration with ORC by maintaining close communication in these compliance matters.
- 2.7. In just over 10 years, WCG has invested over \$23 million in wilding control. It would not have been possible to raise that amount without vital baseline funding from our local established funders, as WCG is first required to have a percentage of funds already in place before drawing down both MPI funds and other funds. One of the original reasons why WCG was developed as a local charity group was so that they could access additional funds unavailable to our stakeholders and leverage baseline funds into much greater sums. In this 2021/22 financial year, WCG invested time in planning and lobbied successfully for a budget of nearly \$3 million from MPI and in the following 2022/23 year have a provisional MPI budget of nearly \$2.5 million. Initial stakeholder funding allowed WCG to confidently secure these amounts. Stakeholders include Landowners, the Department of Conservation (DOC), Land Information NZ

(LINZ), Queenstown Lakes District Council (QLDC), Otago Regional Council (ORC), other funding bodies, community and business donations.

2.8. WCG submit that ORC continues with a minimum of \$100,000 plus inflation as annual funding to Whakatipu Wilding Conifer Control Group Inc (WCG) for the management of these pest trees but to take a view of increasing this amount to be more in line with funding from other agencies, namely the QLDC who contribute \$500,000 annually.

2.9. WCG appreciate the ORC's current successful, collaborative working partnership with "wilding pine" community-led groups.

Recommendation:

That Otago Regional Council continues to support the community-led Whakatipu Wilding Conifer Control Group Inc (WCG) with annual funding from a targeted rate of \$2.02, at a minimum of \$100,000 plus inflation, as outlined in the ORC Annual Plan, to control wilding conifers as described in the Otago RPMP but to also consider further increasing this amount to be more in line with other funding bodies contributions.



WCG 2021/22 work programme: 80 x wilding conifer control operations carried out this season, with another 30 projects either currently being carried out or in the planning stage.

One of many Aerial Basal Bark Application (ABBA) lancing operations carried out this season:



Two helicopter boom operations out of seven this season: Aerial Foliar Spray Application (AFSA).

Swipers Gully, above Macetown Rd



Arrowtown Backcountry



Submission on Draft Otago Regional Council Annual Plan 2022-2023

TO: Submission on Otago Regional Council Annual Plan
Otago Regional Council
144 Rattray Street
Dunedin 9016

SUBMITTER DETAILS

Yellow-eyed Penguin Trust

Contact Person: David McFarlane
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TRADE SUBMISSION

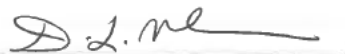
We could not gain an advantage in trade competition through this submission.

HEARINGS

We do not want to be heard in support of our submission.

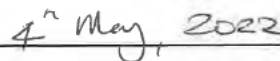
SUBMISSION DETAILS

Please see attached



Signature of submitter
(or person authorised to sign on behalf of submitter)

Date



BACKGROUND

The Trust

The Yellow-Eyed Penguin Trust was formed in 1987. It is based in Dunedin, but its focus is the entire range of the penguin from Banks Peninsula to the subantarctic Auckland and Campbell islands. The Trust owns and manages land for penguin breeding habitat at four key locations on the Otago Peninsula in Dunedin, one site in Clutha and one in Waitaki, and undertakes or supports conservation work at 40 plus other South Island sites, around Stewart Island, and on off-shore islands.

The Trust's work includes:

- **Habitat restoration:** Conservation of yellow-eyed penguin breeding habitats, including planting, predator control, fencing, stock exclusion, and associated maintenance.
- **Predator control:** Bait and trap control of introduced predators such as stoats, ferrets, cats and possums.
- **Advocacy:** Promoting and advocating for the conservation of yellow-eyed penguins through submitting on planning documents and involvement in many committees and processes. The 2020 launch of a new strategy to support the ecological and cultural health of hoiho, *Te Kaweka mō te Hoiho* and 5-year action plan *Te Mahere Rima Tau* was a partnership between the Trust, Te Rūnanga o Ngāi Tahu, Department of Conservation Te Papa Atawhai and Fisheries NZ Tini a Tangaroa.
- **Science advice:** The Trust employs a Conservation Science Advisor, Dr Trudi Webster, who is working on marine issues confronting yellow-eyed penguins.

Yellow-eyed penguins

The threatened yellow-eyed penguin is the one of the rarest penguins in the world, and the largest of temperate-climate penguins at up to 600mm tall. Its scientific name (*Megadyptes antipodes*) refers to a large diver from the southern lands, and its Maori name *hoiho* or 'noise shouter' refers to its shrill cry.

The mainland population in recent decades has fluctuated between 400-600 breeding pairs. However, the last five breeding seasons have seen populations hit by a combination of an unexplained adult mortality event, disease, starvation and injuries. **The total number of breeding pairs on the mainland has now fallen to around 180 pairs, a decline of 69% since 2008.**

This now raises serious concerns about the species' ability to survive on the mainland and appropriate habitat protection and conservation support are vital to their future.

Further information on the Trust, the biology of the penguins, and the threats they face, is contained on the Trust's website www.yellow-eyedpenguin.org.nz.

Specific Submission Details

General comments: The Trust appreciates the increasing focus shown by the Otago Regional Council on both the protection and enhancement of the region's native biodiversity. It is particularly gratifying to read in the introduction by Andrew Noone the reference to biodiversity and the commitment to improve it.

Submission:

The Trust believes that the significance and value of native biodiversity must continue to be recognised and supported by the Otago Regional Council.

Regional Planning (p.11)
Lead a regional approach to climate change in partnership with local councils and iwi
Submission: The Trust strongly supports the regional focus on climate change as it impacts on all aspects of our work in the conservation of hoiho. National level policies and approaches will almost invariably fail to address the detail of climate change and how it affects the Otago region.
Decisions sought: 1. Lead the regional approach to climate change as already expressed in partnership with local councils and iwi as proposed, but also provide a mechanism for input from community groups such as NGOs like the Yellow-eyed Penguin Trust. The trust has specific scientific expertise and experience gained over 30 years of conservation work on the Otago coast that is invaluable in understanding climate change impacts.

Regulatory (p. 12)
Submission: Compliance monitoring is an area of work often under resourced by regulatory authorities and the Trust is supportive of the increase in staff capacity. It has been our experience of observing consenting and compliance with consents and planning documents, that consent conditions are sometimes not being met due to a lack of compliance monitoring.
Decisions sought: 1. Continue to improve the compliance resources, especially staffing, of the Otago Regional Council.

Environment (p. 16)
Submission: The Trust commends what seems to be a new focus on the coastal waters of Otago, as shown by the comments in the plan and the implementation of a regional coastal environment monitoring programme. The Review of the Regional Plan: Coast for Otago is long overdue. We strongly support the Otago Regional Council's key role in the management of coastal waters out to 12 NM and their significant biodiversity values.
Decisions sought: 1. Make the ORC commitment to managing coastal waters and their biodiversity much more explicit and measurable in the revised "Regional Plan : Coast for Otago".

Biodiversity and Biosecurity (p.20)
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Submission: Otago Regional Council has the regional oversight and authority to co-ordinate and promote biodiversity protection and enhancement in Otago and it is critical that it undertakes this key role with urgency and vigour.

Pest management (animal & plant) is rightly recognised as being vital and we endorse the comment that it enables thriving biodiversity and the commitment to increase resources in this area. Similarly the commitment to building knowledge and a monitoring framework for indigenous biodiversity is also essential.

The ORC leadership role is clear, however we note with some concern the comments about the LTP and facilitating and co-ordinating a regional biodiversity hui (p.20). Community groups – especially those with some standing and experience (e.g YEPT / Forest & Bird / Predator free Dunedin / STOP / catchment groups etc) should be invited to attend alongside the other groups mentioned.

Community conservation groups have carried a very heavy load for years, often when biodiversity conservation was more or less overlooked by the regional council and territorial authorities, and their experience and expertise cannot be ignored in the development of a regional biodiversity strategy.

Funding conservation work is always challenging and the ORC Eco Fund programme has been a very valuable resource. The decision to expand the grants programme (p.21) over the term of the LTP is therefore much appreciated.

Decisions sought:

1. Continue to prioritise and fund both ORC work plans and other initiatives (such as the Eco Fund) that support biodiversity protection and enhancement in Otago.
2. Invite community conservation groups to participate in the planned regional biodiversity hui.

Analysis of Consultation ‘Feedback Form’ questions

Process Overview

Following the Council’s approval on an Annual Plan proposal suitable for community consultation, the ORC ‘Yoursay’ online engagement platform was ‘opened’ for feedback.

An advertising campaign invited feedback via connecting online or via calling/visiting Council’s customer service.

Once online people had access to a ‘Feedback Form’ that asked questions pertinent to some of the concerns held by regional councillors and provided a space for general feedback. Visitors to ‘Yoursay’ could also access a range of information including but not limited to the Annual Plan proposal and associated rating for different properties.

Over a period of 4 weeks 98 submissions were received in the form of replies to the questionnaire and separate written communications. The latter consisted of 33 letters largely from organisations (see list below).

Council staff analysed all feedback with the survey results presented below and separately from the letters.

Analysis of Feedback (Questions)

The feedback form provided five questions (one conditional) plus a ‘general comment’ space. Most respondents who engaged with the ‘feedback form’ answered the four primary questions. The fifth ‘conditional’ question was predicated on respondents having a preference(s) for what work should be reduced if Council were to decide on that course of action. They could then comment on what that work might be.

Q1. How do you think Council should react to the current global issues with regards to our 2022-2023 work programme?

80 responses were received to this question.

71% answered either “no change – stick with the long-term perspective and build capacity in agreed areas” or “watching brief – use the next 6 months to better understand how NZ and our communities are impacted by current issues and then revisit the LTP programme”. Interestingly, some of the ‘watching brief’ respondents felt that Council should-not stick to the Long-term programme.

29% answered “immediate pause of the LTP programme – resulting in a delayed or reduced work programme and reduced rate increase. Most of these respondents also indicated that Council should not stick to its Long-term Plan and the associated increased scale of work over years 1 to 3.

Q2. Do you think Council should stick to its Long-term Plan that increased the scale of work over years 1 to 3?

72 responses were received to this question.

42 (60%) responded 'Yes' (Council should stick to plan)

30 (40%) 'No it should not stick with its Long-term plan

Q3. What is the impact of the ORC rate to your yearly household spend or business/commercial operation?

The names of those responding to this question have not been reported for privacy reasons and to reduce perceived barriers to answering this question.

72 responses were received to this question.

45 (63%) answered either "modest – aware of the expenditure item but is absorbed" (43%) or "little to no impact" (17%).

27 (37%) indicated the impact would be "Significant – need to carefully balance other spend items in order to pay the rate bill".

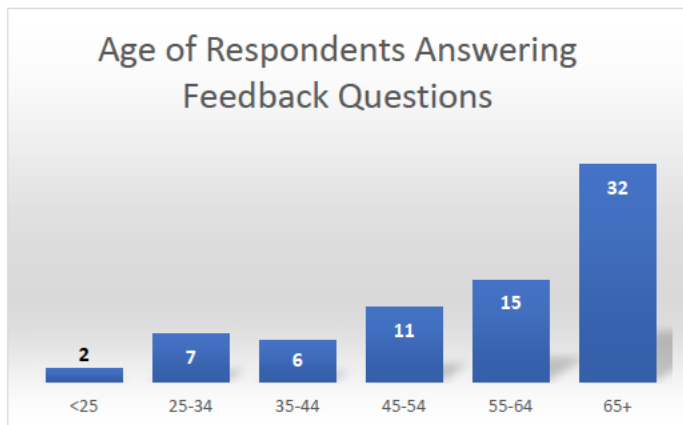
Q4. If Council was to reduce its work programme do you have strong preference for what that might be?

78 responses were received to this question.

50 (64%) either expected the Council to decide (41% of total responses) about possible reductions to its' work or had no preference (23%).

28 (36%) indicated they had a preference for what work might be reduced to reduce funding impacts. The majority of these respondents then provided comment(s) about their preferences.

Age of Respondents Answering the above Questions



Written Feedback

Attachment 1 **'Table of Feedback-draft Annual Plan 2022-23'** is an electronic snapshot of the database containing details of who provided feedback and their comments provided on the 'Yoursay' platform.

In addition to the above feedback 33 letters were uploaded, largely by organisations, onto 'Yoursay'. Table 1 shows the organisations and attachment 3 provides a compilation of the letters.

Table 1 – List of Organisations providing Feedback

Submission Number	Government Agencies, community organisations and advocacy groups
11	Arrowtown Promotion & Business Association
12	Arrowtown Village Association
18	Bus Users Support Group Ōtepoti/Te Roopu Tautoko Kaieke Pahi ki Ōtepoti (Bus Go)
19	Business South Inc
21	Central Otago Dark Skies Society Incorporated
22	Central Otago Wilding Conifer Control Group Inc.
23	Coastal Communities Cycle Connection
29	Department of Conservation
30	Disabled Persons Assembly NZ
32	Dunedin City Council
33	Dunedin Tracks Network Trust
34	Dunedin Tramways Union, Whakakotahitanga Taramu ki Ōtepoti (NZ Tramways and Public Passenger Transport Employees Union Dunedin Branch Incorporated; registered incorporated society No 2567102)
36	Federated Farmers NZ
37	Forest and Bird Dunedin/Otepoti
39	Friends of Lake Hayes Society Inc
51	John Arnold, Honorary Secretary, Otago Yacht Club
68	Otago Helicopter Trust
69	Otago Peninsula Community Board
71	Protect Our Winters NZ
72	PSA
74	QLDC Climate Reference Group
75	Queenstown Lakes District Council
83	Southern Lakes Sanctuary
86	Taieri Trails Trust C/- Colin Brown
88	The Otago Fish and Game Council
92	Unions Otago
95	Whakatipu Wilding Conifer Control Group Inc (WCG)

97	Wise Response Society Inc
98	Yellow-eyed Penguin Trust

Summary of 10 May 2022 Presentation to Councillors

Context

The following information supports the 1 June 2022 Council deliberation for the Annual Plan process. It summarises the key points of the 10 May 2022 presentation to Councillors regarding the Annual Plan process.

The presentation built on that provided to the 30 March 2022 extraordinary Council meeting and included information and advice on:

- Councillor questions
 - Staffing levels
 - Deferrals
 - Legal costs
 - Public Transport
 - Taieri drainage
 - Land and water regional plan
- Inflation impact - not just a rates issue but also impacts our spending power
- Decrease options – specific vs across the board
- Cuts – permanent or deferrals?