



Waitaki

DISTRICT COUNCIL

TE KAUNIHERA Ā ROHE O WAITAKI

**I hereby give notice that the
Council Meeting**

will be held on:

Date: Tuesday, 26 August 2025

Time: 11:00 am

**Location: Council Chamber, Third Floor
Office of the Waitaki District Council
20 Thames Street, Oamaru**

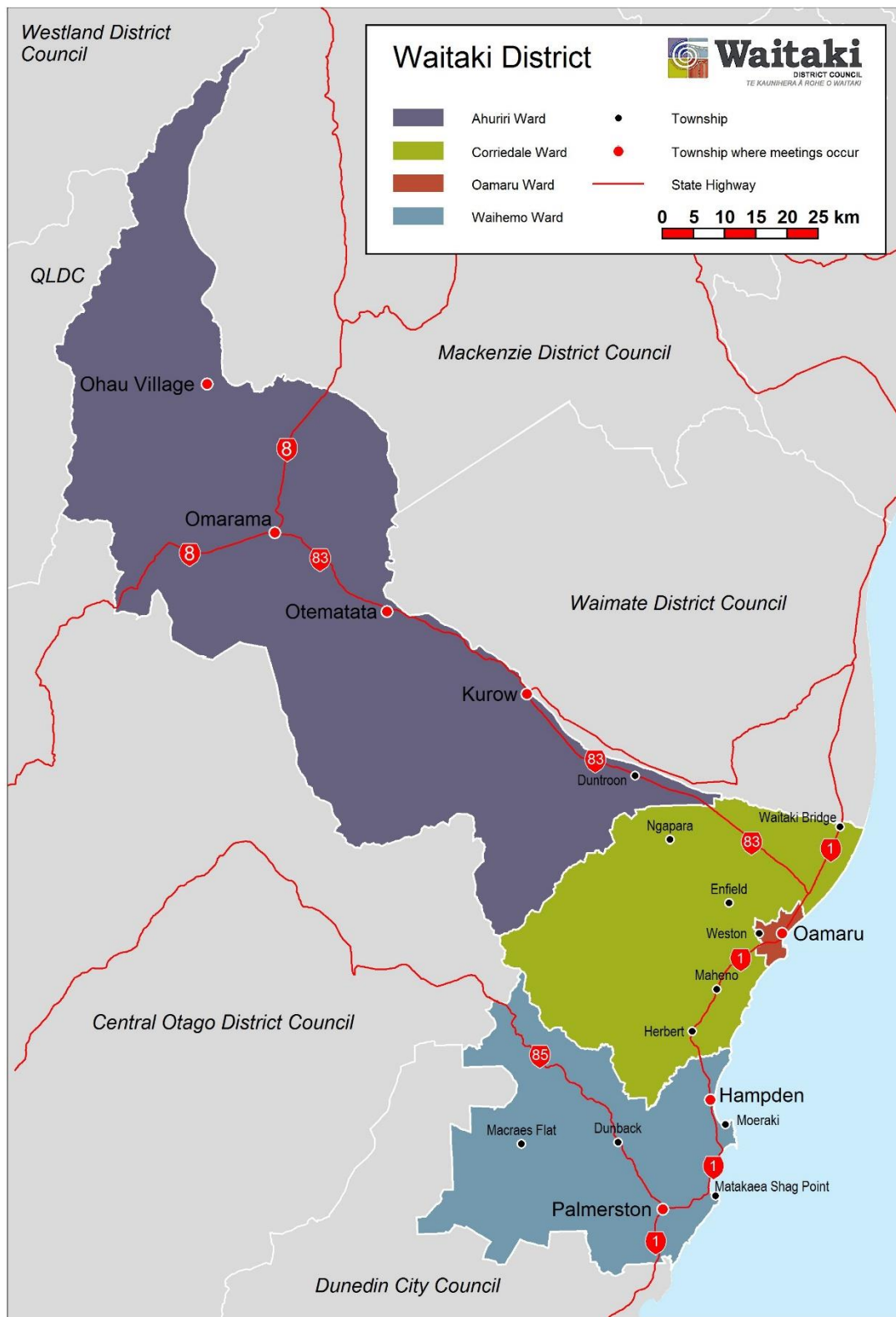
Agenda

Council Meeting

26 August 2025

**Alex Parmley
Chief Executive**

This meeting will be livestreamed on Council's YouTube channel.
<https://www.youtube.com/live/jNV3xC-y8BY?si=vm0caQmi5K2ifgGP>





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- 1 APOLOGIES**
- 2 DECLARATIONS OF INTEREST**
- 3 PUBLIC FORUM**

4 CONFIRMATION OF PREVIOUS MEETING MINUTES

4.1 PUBLIC MINUTES OF THE COUNCIL MEETING HELD ON 29 JULY 2025

Author: Arlene Goss, Governance Services Lead

Authoriser: Paul Hope, Director Support Services

Attachments: 1. Public minutes of the Council Meeting held on 29 July 2025

RECOMMENDATION

That the Council confirms the Public minutes of the Council Meeting held on 29 July 2025, as circulated, as a true and correct record of that meeting.

UNCONFIRMED MINUTES

**OF THE COUNCIL MEETING
HELD IN THE COUNCIL CHAMBER, THIRD FLOOR, OFFICE OF THE WAITAKI DISTRICT
COUNCIL , 20 THAMES STREET, OAMARU
ON TUESDAY, 29 JULY 2025 AT 11:00 AM**

PRESENT: Mayor Gary Kircher, Cr Hana Halalele, Cr Rebecca Ryan, Cr Jim Hopkins, Cr Tim Blackler Cr Jeremy Holding, Cr Brent Cowles (online), Cr Guy Percival, Cr Courtney Linwood, Cr Jim Thomson

IN ATTENDANCE: PAR Committee Chair Simon Neale
Alex Parmley (Chief Executive)
Paul Hope (Director, Support Services)
Joanne O'Neill (Director, Strategy, Performance & Design)
Lisa Baillie (Director, Community Engagement and Experience)
Amanda Nicholls (Finance Manager)
Joshua Rendell (on behalf of Roger Cook, Natural and Built Environment)
Jason Lilley (Livestream Support)
Arlene Goss (Governance Lead/Minutes)

IN ATTENDANCE FOR SPECIFIC AGENDA ITEMS:

Lucianne White and Sonia Marteniz (Communications and Community Engagement)
Gary MacLeod (Corriedale Water Management Ltd)
Andrew Bardsley (Regulatory and Compliance Manager)

The Chair declared the meeting open at **11am** and welcomed everyone present.

1 APOLOGIES

RESOLVED WDC 2025/070

Moved: Member Jim Thomson

Seconded: Member Guy Percival

That the apology received from Cr John McCone be accepted.

CARRIED

2 DECLARATIONS OF INTEREST

There were no declarations of interest.

3 PUBLIC FORUM

[1:37](#) Peter Plunket spoke on several issues. He showed an article from the Oamaru Mail regarding rates predictions under an in-house water delivery model. He said council was going to face these costs whether it went with a CCO or in-house delivery.

He then spoke about the Long Term Plan and asked Council to stretch out or postpone the items on the projects list to keep the rates similar to the rate of inflation.

He gave examples of council initiatives that he felt were not essential or should be delayed.

Mr Plunket also opposed the transformation plan. He wanted to know the benefit to the ratepayer for the expense. He asked Council to stay within the inflation rate and show economic restraint.

The Mayor responded to some of the points raised by Mr Plunket and gave examples of savings that had been made. He encouraged Mr Plunket to watch the recordings of previous workshops, when councillors discussed the budgets.

The chief executive explained that Council could remove all arts and community spending and would still not save enough money to fund water services and depreciation on water assets. Regarding the benefits of transformation, he pointed Mr Plunket to information on the website that explained this, and a link to this information was provided to Mr Plunket by email. The Mayor also offered to catch up with Mr Plunket if he wanted to discuss the issues further.

[18:17](#) Mike Sweeney then took the table. He gave the example of Waimakariri District Council as a council that had successfully proposed an in-house water delivery unit, and outlined the details of that situation and how it works. He said this established a precedence and he hoped Waitaki would learn from these lessons.

The Mayor noted there were significant differences between the situation in Waimakariri and Waitaki, including a higher number of water users, high growth and newer infrastructure in Waimakariri.

Cr Hopkins asked if staff had looked at the Waimakariri situation in planning. The chief executive said he was not considering a restructure or adding a water department like theirs, as this would add a lot of cost. He believed the most cost-effective way was to work with the existing structure and undertake a financial ring fencing.

Mr Sweeney was thanked for attending.

4 CONFIRMATION OF PREVIOUS MEETING MINUTES

4.1 PUBLIC MINUTES OF THE EXTRAORDINARY COUNCIL MEETING HELD ON 30 JUNE 2025

RESOLVED WDC 2025/071

Moved: Cr Jim Hopkins
Seconded: Cr Jeremy Holding

That the Council confirms the Public minutes of the Extraordinary Council Meeting held on 30 June 2025, as circulated, as a true and correct record of that meeting.

CARRIED

4.2 PUBLIC MINUTES OF THE EXTRAORDINARY COUNCIL MEETING HELD ON 8 JULY 2025

RESOLVED WDC 2025/072

Moved: Cr Jim Hopkins
Seconded: Cr Jeremy Holding

That the Council confirms the Public minutes of the Extraordinary Council Meeting held on 8 July 2025, as circulated, as a true and correct record of that meeting.

CARRIED

4.3 PUBLIC MINUTES OF THE COUNCIL MEETING HELD ON 24 JUNE 2025

RESOLVED WDC 2025/073

Moved: Cr Jim Hopkins

Seconded: Cr Courtney Linwood

That the Council confirms the Public minutes of the Council Meeting held on 24 June 2025 as a true and correct record of that meeting, with minor grammatical corrections.

CARRIED

5 RECOMMENDATIONS FROM COMMITTEES REPORTS

5.1 RECOMMENDATIONS OF THE WAIHEMO COMMUNITY BOARD MEETING HELD ON 7 JULY 2025

5.1.1 HAMPDEN WASTEWATER INVESTIGATION FUNDING

RESOLVED WDC 2025/074

Moved: Member Jim Hopkins

Seconded: Deputy Hana Halalele

That Council confirms the recommendation from the Waihemo Community Board:

- a) That the loan-funded amount of \$40,000 originally set aside for a study into a Hampden wastewater system be repaid.
- b) That staff communicate (or consult) with the Hampden community on the cost of developing a reticulated wastewater system.

CARRIED

5.1.2 LINCOLN STREET RAIL CROSSING, HAMPDEN

Cr Hopkins asked that the words “east of the railway lines” be added to clarify the location.

RESOLVED WDC 2025/075

Moved: Cr Jim Thomson

Seconded: Cr Courtney Linwood

That Council confirms the recommendation from the Waihemo Community Board and approves of making Lincoln Street one-way east of the rail lines to alleviate safety concerns.

CARRIED

6 DECISION REPORTS

6.1 ADOPTION OF THE COMMUNICATION AND ENGAGEMENT STRATEGY INCLUDING ENDORSEMENT OF NEW COUNCIL BRAND

[32:19](#) Lisa Baillie introduced the report and said the new strategy was a key tool in engaging with communities. Staff were looking forward to taking this forward.

It was noted that the strategy included the comment that the community wanted to see Council as “good at listening”, however members of the public defined this as Council agreeing to do what individual members of the public wanted. Discussion took place on how to communicate that good listening and consultation always resulted in a number of people being disappointed.

It was exciting to have a modern guiding document. Credit was given to staff for their work creating the new brand in-house.

RESOLVED WDC 2025/076

Moved: Cr Rebecca Ryan

Seconded: Cr Jim Thomson

That Council:

1. Adopts the new Communications and Engagement Strategy as attached.
2. Endorses the new Waitaki District Council logo.

CARRIED

The Mayor brought Item 6.4 forward in the schedule.

6.4 RATIFICATION OF COUNCIL SUBMISSION ON THE MATTER OF THE BUILDING AND CONSTRUCTION (SMALL STAND-ALONE DWELLINGS) AMENDMENT BILL

[55:33](#) The purpose of this report was to retrospectively ratify Waitaki District Council's submission on Building and Construction (Small Stand-alone Dwellings) Amendment Bill as submitted to the Committee Secretariat, Transport and Infrastructure Committee on 23 June 2025. Several questions were asked by the councillors and were answered by staff.

RESOLVED WDC 2025/077

Moved: Mayor Gary Kircher

Seconded: Cr Jim Thomson

That Council:

Formally ratifies Waitaki District Council's submission on Building and Construction (Small Stand-Alone Dwellings) Amendment Bill.

CARRIED

The meeting adjourned for lunch at 12pm and reconvened at 12.45pm.

6.2 WAITAKI DOG CONTROL BYLAW

[1:46:06](#) This paper asked Council to adopt into the Waitaki Dog Control Bylaw 2024 and Waitaki Dog Control Policy following a 6-month trial allowing dogs on-lead in the Ōamaru CBD, Harbour Street and Ōamaru North CBD areas.

Josh Rendell introduced this report and said the feedback from the community was overwhelmingly positive, hence the recommendation from the staff to make this trial permanent.

Andrew Bardsley then provided background information about the consultation process. He noted the submission from the Penguin Colony as being especially helpful.

The councillors asked about the need for signage and communications to inform the public. They then debated whether dogs should be banned from the Harbour Street area to protect the penguins.

Cr Hopkins suggested an amendment to the bylaw regarding the situation of dogs on playing pitches and sportsgrounds. It was important to keep dogs off playing areas. Staff were asked to fine-tune this to make it clear in the bylaw that dogs were not allowed on marked pitches.

Cr Blackler suggested that recommendation 1(b) be removed and replaced with an alternative motion to say dogs are prohibited on Harbour Street. This was seconded by Cr Hopkins and debated.

Cr Ryan preferred to keep the proposed recommendations with the knowledge this could be reversed if a problem was discovered in the future. She had received feedback that people had enjoyed sitting outside cafes on Harbour Street with their dogs. The Mayor agreed.

Cr Hopkins supported Cr Blackler's amendment to be consistent with the situation at Beach Road, where dogs are prohibited. He also asked for an amendment to the wording in the Dog Control Policy, which was added to the resolutions below.

RESOLVED WDC 2025/078

Moved: Cr Rebecca Ryan

Seconded: Mayor Gary Kircher

That Council permanently adds to the Waitaki Dog Control Bylaw 2024 and Waitaki Dog Control Policy 2024, the following change:

- a) Dogs allowed on-lead Thames Street & Thames Highway, Ōamaru.

That Council amends the reference to section 3(1)(g) and replaces the words "all marked pitches" wherever they appear, with the words "all marked playing areas".

CARRIED

AMENDMENT

Moved: Cr Tim Blackler

Seconded: Cr Jim Hopkins

That dogs be forbidden from Harbour Street.

LOST

RESOLVED WDC 2025/079

Moved: Mayor Gary Kircher

Seconded: Cr Rebecca Ryan

That Council permanently adds to the Waitaki Dog Control Bylaw 2024 and Waitaki Dog Control Policy 2024, the following change.

- b) Dogs allowed on-lead from sunrise to sunset & prohibited from sunset to sunrise Harbour Street, Ōamaru, with the commitment to further review if evidence from the Oamaru Penguin Colony supports the need for this.

CARRIED

RESOLVED WDC 2025/080

Moved: Mayor Gary Kircher

Seconded: Cr Rebecca Ryan

That Council approves minor wording changes to the Waitaki Dog Control Bylaw 2024 and Waitaki Dog Control Policy 2024.

CARRIED

6.3 COUNCIL ENDORSEMENT OF AGREEMENT WITH CORRIEDALE WATER MANAGEMENT LIMITED FOR OPERATION OF CORRIEDALE WATER SUPPLIES

[2:18:29](#) The purpose of this report was to establish a formal agreement between Waitaki District Council and Corriedale Water Management Limited (CWML) that clearly outlines the requirements for CWML's ongoing operational management of the Corriedale water supplies.

The draft agreement is acceptable to both parties and outlines the expectations of the two parties. Staff were seeking approval from Council to allow the chief executive to sign the agreement.

The Mayor noted that Gary MacLeod, who manages the water services, was in the chambers and invited him to join the table. Mr MacLeod answered questions and further discussion took place on various issues. The Mayor thanked Mr MacLeod and Corriedale Water Management for their work, and also thanked staff for putting the agreement together.

RESOLVED WDC 2025/081

Moved: Mayor Gary Kircher

Seconded: Cr Jim Thomson

That Council:

1. Delegates authority to the Chief Executive to sign the new agreement for operational management of the Corriedale water supplies by Corriedale Water Management Limited, on behalf of Council.

CARRIED

6.5 EXEMPT COUNCIL CONTROLLED ORGANISATIONS FROM THE LOCAL GOVERNMENT ACT

[2:28:09](#) The purpose of this report was to grant an exemption by resolution of the Council, in line with section 7 of the Local Government Act 2002, that Omarama Airfield Limited, Waitaki District Health Services Limited, and Waitaki District Health Services Trust are no longer legislatively bound by the requirements of the Local Government Act 2002 that relate to Council-Controlled Organisations.

An exemption must be granted by resolution of Council and be renewed every three years thereafter. An exemption can be revoked at any time.

Cr Blackler asked regarding the legislative requirements for audit and this was answered by the finance manager.

The Mayor asked if the retirement village trust could be included in this. The Finance Manager said she would investigate this and speak to the auditor.

RESOLVED WDC 2025/082

Moved: Cr Jim Hopkins

Seconded: Cr Tim Blackler

That Council:

1. Resolves to exempt the following entities from the Local Government Act 2002 requirements that relate to Council-Controlled Organisations:
 - a) Omarama Airfield Limited
 - b) Waitaki District Health Services Limited
 - c) Waitaki District Health Services Trust

CARRIED

6.6 RECOMMENDATION TO CONTINUE WITH WAITAKI DISTRICT HEALTH SERVICES LTD AS A CCO UNTIL A COMPLAINT IS RESOLVED

[2:28:39](#) In a previous resolution the Council resolved to wind up Waitaki District Health Services Ltd (WDHSL) by 30 June 2005.

Since that resolution was passed, WDHSL have received a complaint from the Health and Disability Commissioner regarding the treatment of a patient in 2023. This impacts the ability for WDHSL to wind up while a complaint is live.

At the WDHSL Board meeting on June 19th external Legal Counsel recommended that Council retain WDHSL as an entity until the complaint is resolved. However, to simplify the accounting treatment and governance of WDHSL's property management obligations, it was advised to reduce WDHSL's asset book and management function, along with everything associated with it, to the bare minimum.

WDHSL chairman Simon Neale spoke summarised the contents of the report and then asked for questions. Councillors asked why the complaint was taking so long. Council had no control over that process, and it was common for complaints to the Health and Disability Commissioner to take up to two years to resolve.

RESOLVED WDC 2025/083

Moved: Cr Jim Thomson

Seconded: Cr Rebecca Ryan

That Council:

1. Resolves to extend the timeframes of the resolution to wind up Waitaki District Health Services Ltd by 30 June 2025 and continue with WDHSL as a stripped-out council controlled organisation until the outstanding complaint is resolved with the Health and Disability Commissioner.

CARRIED

7 RESOLUTION TO EXCLUDE THE PUBLIC

RESOLVED WDC 2025/084

Moved: Cr Rebecca Ryan

Seconded: Cr Courtney Linwood

That the public be excluded from the following parts of the proceedings of this meeting.

The general subject matter of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and the specific grounds under section 48 of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:

General subject of each matter to be considered	Reason for passing this resolution in relation to each matter	Ground(s) under section 48 for the passing of this resolution
8.1 - Asset Sales - LTP 2025/34	s7(2)(h) - the withholding of the information is necessary to enable Council to carry out, without prejudice or	s48(1)(a)(i) - the public conduct of the relevant part of the proceedings of the meeting would be likely to result in the disclosure of information for which good

	disadvantage, commercial activities	reason for withholding would exist under section 6 or section 7
8.2 - Recommendations from the Development Contributions Subcommittee PE	<p>s7(2)(a) - the withholding of the information is necessary to protect the privacy of natural persons, including that of deceased natural persons</p> <p>s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information</p> <p>s7(2)(i) - the withholding of the information is necessary to enable Council to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations)</p>	s48(1)(a)(i) - the public conduct of the relevant part of the proceedings of the meeting would be likely to result in the disclosure of information for which good reason for withholding would exist under section 6 or section 7
8.3 - Public Excluded minutes of the Council Meeting held on 24 June 2025	s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information	s48(1)(a)(i) - the public conduct of the relevant part of the proceedings of the meeting would be likely to result in the disclosure of information for which good reason for withholding would exist under section 6 or section 7

CARRIED

8 PUBLIC EXCLUDED SECTION

9 RESOLUTION TO RETURN TO THE PUBLIC MEETING

RESOLVED WDC 2025/085

Moved: Cr Rebecca Ryan

Seconded: Deputy Mayor Hana Halalele

That Council resumes in open meeting and decisions made in the public excluded session are confirmed and made public as and when required and considered.

CARRIED

10 MEETING CLOSE

The Chair declared the meeting closed at 2.09pm.

5 LEADERSHIP REPORTS

5.1 CHIEF EXECUTIVE'S REPORT

Author: Alex Parmley, Chief Executive

Attachments: 1. Annual Elected Member Survey 2025 [↓](#) 

RECOMMENDATION

That Council receives and notes the information.

PURPOSE

This report aims to update Elected Members on the progress made toward achieving the Council's goals and programme, including the status of the Key Performance Indicators (KPIs) set by Council for the Chief Executive (and organisation) for the year ending 30 June 2025. This edition also marks the completion of the current KPI cycle and so does not include the overview of performance within finance, people and projects, but these reports will continue in the quarterly reports going forward.

OVERVIEW

The final quarter of the financial year has seen the organisation delivering several large, priority and in some cases, challenging pieces of work. This includes:

- Concluding the Long Term Plan,
- Responding to the government's Local Water Done Well reforms,
- Responding to and considering a significant number of other government reforms that effect local councils and our communities including RMA reform and the impact on and uncertainty for a challenging District Plan review,
- Progressing our Transformation programme, and
- Delivering our capital programme and "business as usual".

The past year, including the last quarter, has seen the organisation, its capacity and its people stretched to being close to overwhelmed with the volume of high priority work, while maintaining delivery to our district and communities.

The Council overall has made good progress on achieving its ambitions while responding to the reform and challenges and ensuring it delivers its programme and services.

I would like to formally record my thanks for the efforts and commitment of staff and the Governance Team to the Council and our communities over such a challenging year.

The staff team and I remain focussed on working with Governance to continue to deliver and embed transformation so we can achieve our ambition to be "a leading, innovative Council delivering the best for our communities" and realise the benefits we want for our organisation and the communities we serve, including:

- greater value and efficiency,
- improved levels of customer service,
- stronger local focus and connection,

- becoming an employer of choice to retain and attract the skills we need to deliver for our communities, and
- improved communication, engagement and partnering with our communities.

Transformation

After two years (2022/3 and 2023/4) of considering the case for change, developing the business case, and then working with staff and Governance on designing the programme of change, this past financial year (2024/5) has been the year in which we commenced implementing the Transformation Programme and the changes within it. This is the biggest change this organisation has been through since it was established in 1989 and a huge undertaking for the organisation. It is more apparent than ever, with the changes impacting local government, that embarking on the Transformation Programme was the right thing to do.

Transformation has seen a fundamental change in model and approach to how the council delivers and conducts its business. Staff from across the organisation have shown courage, determination and commitment to the organisation and the communities we serve, in delivering change. This has been despite the personal uncertainties change has brought; the other additional work priorities that have emerged; and while largely maintaining services and business as usual to our communities.

The Transformation Programme has delivered significant achievements and improvements in how we deliver services to the community, but with more benefits to come. While the business case set out that many benefits would not be fully realised until two to three years after implementation, improvements are increasingly apparent. It was always understood that transformation would be difficult at various times. However, several unforeseen factors have made transforming Council more challenging than anticipated.

The Council's decision to embark on transformation began out of a desire to do more with the resources it had available so it can deliver the best for the district, residents and customers. And while there would be benefits, it was known that these would take two to three years from implementation to be realised. The Council's leadership knew transformation would be difficult at various times and has had to take place alongside:

- The Government's water reforms and the changes in policy– 3 Waters, Affordable Waters, Local Water Done Well
- The pressures on local government finances (including from water reform) resulting in a challenging, time consuming and resource intensive Long-Term Plan (LTP)
- The additional time and resources required for the District Plan.

While these factors have placed additional pressure on the organisation, on top of the pressure of change, it has not derailed the trajectory of transformation. The Transformation Programme is within its final six months, with the organisation having fully implemented its new structure and all new teams now operational, albeit not all changes and new ways of working up and running yet. The focus is now shifting towards embedding transformation outcomes, ensuring momentum is maintained, and preparing for a seamless transition into a continuous improvement framework, post-programme closure at the end of 2025. The programme's status reflects measured progress across key areas, a clear understanding of remaining work, and a proactive approach to overcoming ongoing external and internal pressures.

The Council has successfully implemented significant structural changes to support its new operating model, breaking down traditional silos and enabling greater cross-departmental collaboration and visibility of work.

Implementation of a new *Customer Service Model* is improving access to customer services and increasing the speed of service delivery, as well as ensuring greater efficiency in use of resources. This is being enabled by:

- A new service desk at Oamaru Library providing extended hours of service including Saturdays for first time, whilst reducing resource requirements.
- An AI bot supporting customer operatives, helping move towards a target of 90% of enquiries dealt with at first point of contact, speeding up service, reducing routine issues going into the back office that cause delays and take up time and specialist resources.
- Digitisation of all Council forms – improving access to services whilst also delivering back-office efficiency savings.
- Digitisation of property files – improving access for customers to property information and enabling self-service which produces efficiencies in saved staff time.
- Implementation of a Case Management approach for applications and complex requests – improving levels of service, improved support for customers, removing the need for customers to navigate their way around different departments and providing efficiencies as less time is taken up of specialists.
- Customer Portal implementation in progress to provide full self-service across the range of council services, give easy access to residents on the information we hold related to them – which will help shape and reduce demand and reduce the cost to serve.

The development of a *Locality Model* is enhancing our connection with and responsiveness to our local communities. Area Leads in the infrastructure team provide local focus in planning local programmes of work as well as a more responsive service for Community Boards and communities. Locality Officers are part of Case Teams but connected to the Customer Team and Infrastructure Team and are our eyes and ears on the ground, enabling us to be more proactive, more connected to communities and improve efficiency. When fully embedded our locality model will enable clear local delivery plans and provide performance reporting on a locality basis to assist more local focus and continuous improvement.

Establishing a *Project Management Office* (PMO) is supporting higher standards of project management, enabling us to ensure improved value for the ratepayer and supporting an improved delivery rate of projects and our capital programme. There is more robust challenge around value for ratepayer funds in terms of quality and cost together with more rigorous project performance management instituted and which is now reported to Council and the Senior Management Team. Improved processes are being put in place, which to date includes project initiation processes and rigorous business cases for projects.

Our approach to *Asset Planning* has been refined, and this will enable an integrated programme across our assets and better asset information that will produce efficiencies. This is a long-term benefit change but already the team are integrating the various programmes of work which were originally planned separately. Our improved *Communications and Engagement* approach supported by a new strategy and a single engagement team where previously our engagement staff were distributed around the different departments, is starting to ensure better information dissemination and higher levels of community engagement.

Investment in and use of *technology*, including AI, is supporting improvements across the organisation. This is supporting our customer service model enabling more efficient and higher levels of service. It also includes many improvements to back-office systems that help remove or automate previous inefficient processes that were a frustration to staff and took resource away from delivery. These systems are also providing staff with better information and self-service options that reduce demand on support teams, improves service, and enable resources to be devoted to activities that add more value to the Council and our communities.

We have commenced the deployment of an *Organisational Performance Management Framework* which is supporting moving the organisation from an activity focus to an outcomes, value, performance and continuous improvement focus. This is work in progress and there is much more to do, including embedding continuous improvement processes. This ambition has been one of the most challenging projects for the council. However, the organisation and all teams now have clearer work objectives and performance measures and there is a more robust framework governing individual staff performance. The recent commencement of Council Benchmarking by the Government will also be helpful in tracking our progress and performance as an organisation and support the drive for continuous improvement.

There has been considerable progress in people and capability management to realise our ambition of becoming an *Employer of Choice* so we can retain and attract the skills we need to deliver effectively for our community. Our new People Strategy provides the focus for this. It has led to a review of our contracts and terms so that our offer is competitive and we can maximise the appeal of less costly non-financial benefits. There is a complete new suite of role profiles across the organisation that are community outcome focussed and less task focussed. In addition, the Competency Framework with its focus on attitudes and behaviours provides for a more robust approach to recruiting the right people with the skills and attitude we need and to managing and enabling high performance. There has been progress in supporting leadership skills and development in the organisation which is important in helping to create a high performing organisation and reshaping the organisational culture. Reshaping the organisational culture is a long-term undertaking and is a work in progress to foster a more empowered workforce that is focussed on customer and community outcomes, takes responsibility and is accountable.

Transformational change of this scale can be disruptive for organisations, BAU delivery, customers and staff. Overall though, during the transformation, services have largely been maintained with minimal levels of disruption and our capital delivery rate has gone up, with the main projects - including large projects such as the Network Waitaki Sports and Events Centre, the Forrester Gallery Extension and the Kakanui Bridge replacement - being progressed successfully. Exceptions are within the library service, where there was temporary disruption, and within governance support, where we struggled to find the capacity to make the planned changes initially, in the context of additional and complex meetings and whereas a result, the service standards dropped for a period. The focus on maintaining BAU across the organisation during the changes, and the fear of failure and the consequences of this, has put a lot of pressure on staff and has slowed the progress of Transformation, but has not stopped it.

Work is progressing on transferring responsibility for Transformation outcomes and benefits into teams' business-as-usual operations and the new performance management framework as the organisation practice becomes increasingly one of continuous improvement. In the meantime, focus for the remainder of the programme will be on progressing the implementation of plans to deliver the target outcomes and benefits in the following areas:

- Customer service model, including locality

- Performance management
- Project Management Office
- Cultural Change
- Embedding prioritisation
- Updating the management / operational leadership model to clarify terms of reference and remits

Long Term Plan (9 Year Budget)

On 30 June, Council adopted its Long Term Plan and 9 year budget. This has been the most challenging LTP this council has faced with significant inflation and in particular the cost of complying with water standards driving up costs at a time when large parts of our community are feeling cost pressures in their household budgets. The financial challenges we faced have meant that the process we went through was not the one we originally planned and different to what Council agreed at the start of the process. There were significantly more briefings and workshops than originally planned to scrutinise every part of the organisation and understand all of our costs and opportunities to reduce these.

Whilst our approach to the LTP has evolved slightly from that in the past to be more focussed on outcomes and value for communities, there is still scope for improvement in approach. Following a feedback session with the Governance Team we will now progress capturing the lessons learned and identifying the opportunities for improvement so that we can have an enhanced process to support the new Council in prioritising, ensuring a clear outcome focus, and also be able to plan for the different needs of our different communities, including with our community boards in Ahuriri and Waihemo. Following the Council's decision to retain water service in house, we will also now plan for an LTP amendment process early in the new triennium, to reflect water services now remaining within Council after 2027.

Elections

We have continued to prepare for elections, focussing our communications on encouraging people to consider standing for Council or their local Community Board. It is pleasing to see a good field of candidates come forward to stand to represent their communities with no costly byelections being required and a choice of candidates for most seats. Our communications focus has now turned to encouraging people to ensure they are registered to vote and then encouraging people to vote.

Work is nearing completion on putting in place an Induction Process for a new Mayor, the new Council and our Community Boards. A good induction programme is essential to ensuring that, whatever background our Elected Members are from, everyone is equipped with the skills and knowledge to perform the governance role. In doing this, our induction will be aiming to ensure the new Mayor, Councillors and Community Boards are set up and supported to be successful in delivering their ambitions for our district and community. The feedback received on the previous Induction Programme together with the survey on support for Elected Members, has been invaluable in ensuring we can develop and improve our support for Governance.

Local Water Done Well

The last financial year has seen considerable work undertaken on understanding and responding to the Government's Local Water Done Well reforms. The timeframes given to councils by the government to submit our Water Services Delivery Plan are short. Such an important strategic decision with such a big impact on our organisation and the communities we serve deserves more

time to consider than we have been given. There has been a lot for all of us and our communities to understand in the intent and the implications of the government's reforms, including that maintaining the status quo is not an option, and that all available options will see significant increases in water charges for our community. All options have up sides and down sides and whatever option is selected, councils will have less control of water with more power given to regulators in the form of the Water Services Regulator and the Commerce Commission as economic regulator, who between them determine the standards, and can determine investment levels and revenue & charges, of Water Services Organisations, whether a CCO or in-house operation.

With the decision by Council to deliver water services inhouse, Council will need a new organisational strategy to continue to reshape how it works and delivers. This will need to take account of the progress made in the Transformation Programme and continue to realise the benefits of the changes, and enable & ensure the creation of a ring-fenced inhouse business unit for water. The strategy will need to continue progress on maximising efficiency and support a focus on priorities, to ensure delivery for our district and communities whilst minimising the cost impact on ratepayers. Work is commencing on the development of a new organisational strategy which will support the review of the LTP and the Water Services Delivery Plan and associated Implementation Plan.

KEY PERFORMANCE INDICATORS (KPIs)

The following KPIs for the Chief Executive for the year ending 30 June 2025 were agreed and adopted on 24 September 2024.

KPI 1 – TRANSFORMATION DELIVERY

KPI – Delivery/Implementation of Transformation Programme – Changing the Way We Waitaki	
<p>Objective:</p> <p>Build the best council in NZ that empowers people and communities, is ambitious and high performing, and delivers excellent outcomes</p> <ul style="list-style-type: none"> • an ambitious council seeking to deliver the best for the district and residents • focussed on role as a community organisation and community leader • flexible, agile and data driven, focussed on performance and continuous improvement • modern, efficient, effective, customer focussed services • well governed • a leading employer with an empowered workforce • One Team in all that we do 	
<p>Strategic Framework:</p> <p>Deliver Transformation Programme – Changing the Way We Waitaki</p>	
<p>Key Results: (series of results that will enable successful delivery of the objective)</p> <ol style="list-style-type: none"> 1. We deliver a customer experience that we're proud of <ul style="list-style-type: none"> • Interactions with Council are frictionless 2. We do the right things at the right time for our community <ul style="list-style-type: none"> • Responsive to real needs of community • Delivering on our promises • Understanding our community 3. We have a reputation as a trusted partner <ul style="list-style-type: none"> • We have the agility to thrive • Responsive to change • Fit for purpose technology 4. We live within our means adding value for money <ul style="list-style-type: none"> • Reduced costs of living in community 	<p>Key Measures: <i>(initial measures, but not limited to these measures)</i></p> <ul style="list-style-type: none"> • Effectiveness – Achieve greater than 80% of key performance outcomes as agreed in the Annual Plan. • Efficiency – Improve the delivery of new and existing council provided services by 10% by implementing better processes and tools. • Effectiveness – Reduce the cost to deliver council provided services by 10% to reinvest in new council provided or partner services. • Community – Involve partners in the delivery of 10% of existing and new council services to support the delivery of the community outcomes.

<ul style="list-style-type: none"> • Rates viewed as an investment • Council gives more than it takes 	
5. We are an employer of choice <ul style="list-style-type: none"> • Staff proud to work at Council 	<ul style="list-style-type: none"> • Achievement of a 5% increase in the Culture measure, for each undertaking of the survey, in the Council's chosen Staff Engagement Survey.
6. The Governance Team and Community Board members are supported to carry out their governance roles.	<ul style="list-style-type: none"> • A baseline measurement is introduced during the 2025 calendar year, to be measured on an annual basis.

Progress Update:

1. We plan to close the Transformation Programme by the end of 2025. This does not mean that we will have fully complete the transformation process and achieved all of the outcomes and benefits. Whilst we can now see the benefits of Transformation starting to be realised, as set out in the business case agreed by Council, the benefits of transformation will not be fully realised until two to three years from implementation. Work is progressing on the final stages of the programme and the transition of the transformation ambitions and outcomes in the BAU of the organisation, including in how the organisation manages performance and supports continuous improvement. This will include ensuring that metrics relating to the outcomes and benefits of transformation are reflected in the performance management information and reporting. Annual reports will document Council's performance against Annual Plan metrics, starting with the 2025/26 annual report as the initial point of comparison.
2. All Council forms are now available online, with many supporting payments and integrating into business workflows. New self-service tools—including knowledge base articles and an automated customer assistance to give residents 24/7 support - are live on our website. Progress continues on i) the introduction of a Customer Portal to provide improve access to services for self-serve and to customer information; ii) making available on line all property files iii) an online booking system which – all of which are planned to launch in late 2025 and which will improve access to and levels of service.

Ongoing efficiency improvements are anticipated in the coming months as the Performance and Continuous Improvement team advances the foundation set by the Transformation Programme. Employees will experience further enhancements through the implementation of updated workflows, while customers will continue to benefit from new tools and processes designed to strengthen and expand Council services.
3. Several benefits of transformation have been observed in both communication strategies and community engagement, with increasing levels of participation and interaction. The implementation of the locality model, along with place-based planning and service delivery, is beginning to yield positive outcomes. Further results are anticipated as these new approaches become further integrated over the next 6 to 12 months.
4. The recent Staff Engagement Survey reported an employee engagement (culture) score of 67% (3.37/5), an increase from 65% in 2023. Teamwork and collaboration are recognised as key organisational strengths, with the majority of employees reporting collegial support. Additional positive elements include well-established team dynamics, leadership initiatives designed to provide support, autonomy within individual roles, and effective managerial mentorship.

5. A survey has recently been conducted of Elected Members to establish a baseline measure of the level of support governance receives. The results of the survey are attached to the report and demonstrate positive satisfaction with the support for Elected Members and in particular, the improvements made, but point to areas where further improvement can be made as part of our continuous improvement approach.

KPI 2 – COMMUNITY OUTCOMES

KPI 2a – Quality Services	
Objective:	
Deliver modern, effective customer services within a culture of continuous improvement.	
Strategic Framework:	
<ul style="list-style-type: none"> Robust core infrastructure and services Community facilities and services we are proud of 	
Key Results: (series of results that will enable successful delivery of the objective)	Key Measures: (initial measures, but not limited to these measures)
<ol style="list-style-type: none"> Support our district to thrive via sustainable, resilient, and reliable networks and infrastructure Enhance access to current and future services for the community through user-friendly and convenient options Improve community wellbeing through enabling the provision of a highly valued and financially sustainable network of community facilities Council as an organisation delivers value and improvement efficiently and effectively to the district 	<ul style="list-style-type: none"> By achieving an overall satisfaction rating with the Council's performance of 60% from resident surveys Reduce the need for over-the-counter service by 20% in the 12 months following the implementation of the new Customer Service model Achieve an overall satisfaction rating with quality of life in the district of at least 85% from resident surveys By implementing agreed outputs of the Transformation Programme by the end of the financial year (see KPI 1 for more detail)

Progress Update:

1. The Resident Satisfaction survey is currently being finalised, and a full report and analysis is planned to be tabled at the September meeting of Council. The overall satisfaction rating was 44% in 2025, below the target of 60% and down from 48% in 2024. Satisfaction with sealed roads declined from 42% in 2024 to 39% in 2025, while satisfaction with unsealed roads saw a slight increase, rising from 29% to 31% over the same period. Additionally, satisfaction with the water supply experienced a small decline, dropping from 75% in 2024 to 70% in 2025. The average satisfaction scores for Roading and Waters changed from 48.6 in 2024 to 47 in 2025. Overall, Councils across the country are experiencing declining satisfaction increasing distrust. In addition, in implementing large scale organisational change programmes it is common to see an impact on customer satisfaction. However, this does not mean that the

level of satisfaction is accepted, and the results of the satisfaction survey will be used as a focus for the Council's continuous improvement.

2. All hardcopy and PDF forms related to core services have been digitised. Additional self-help and self-service features, including webchat and a knowledgebase, are now available to decrease over-the-counter transactions. A baseline for the 2024/25 financial year will be established and compared at the conclusion of the 2025/26 financial year.
3. Overall satisfaction with facilities shifted from 78.8% in 2024 to 75.9 in 2025. Satisfaction at Oamaru Opera House changed from 91% in 2024 to 89% in 2025. Parks and Reserves maintained a consistent satisfaction rate of 80% across both years. Sports fields and facilities moved from 75% in 2024 to 73% in 2025. Campgrounds recorded 72% in 2024 and 69% in 2025. Public toilets had a satisfaction rate of 70% in 2024 and 72% in 2025. Aquatic Centre figures were 75% in 2024 and 76% in 2025. Cemeteries went from 81% in 2024 to 76% in 2025. Libraries measured 85% in 2024 and 74% in 2025. Resource Recovery Park showed a satisfaction rate of 80% in 2024 and 75% in 2025.
3. The KPI for delivery of the Transformation outputs is considered complete for the financial year, with all four transition stages finished on schedule as outlined. Expected benefits are projected to continue to be realised as planned, over the upcoming months and years, in accordance with the benefits realisation indicated in the initial business case and mandate for change. The operating model and associated teams and departments will continue to develop and be embedded as new working methods are implemented.

KPI 2b – Strong Communities

Objective:

Support and enable our communities to improve wellbeing

Strategic Framework:

- Enabling safe and healthy communities
- Connected, inclusive communities
- Promoting a greater voice for Waitaki
- Celebrating our community identity

Key Results: <i>(series of results that will enable successful delivery of the objective)</i>	Key Measures: <i>(initial measures, but not limited to these measures)</i>
<ol style="list-style-type: none"> 1. Support and promote public health and wellbeing through community initiatives and programmes. 2. Promote diversity and cultural understanding within the community and within Council 3. Facilitate the development of an “intentional plan” with the Council Governance Team that enables the Waitaki community to have local input into regional and central government decision-making – engage with ministers and officials to advocate for Waitaki. 4. Support and promote local arts, culture, sport, and recreation 	<ul style="list-style-type: none"> • By increasing Council participation in education and awareness by 50% • By increasing the delivery of cultural competency education programmes to 14 by the end of the year • Engaging in 75% of all relevant submission opportunities • By growing utilisation and participation by 5% year on year

Progress Update:

1. The Warmer Waitaki Curtain Bank initiative has been successfully launched, with operational training provided by the Dunedin Curtain Bank, enabling volunteers to begin their work and local service providers to start making referrals. In addressing homelessness, Stronger Waitaki organised a hui with community partners to complete a stocktake and gap analysis of available services and to identify suitable referral pathways. This gathering not only facilitated connections among service providers and community groups, fostering collaborative opportunities, but also saw attendance from 40 individuals representing 25 organisations. Additionally, a partnership has been formed with Fire and Emergency New Zealand to assist locality officers in delivering fire safety education to people living rough. Stronger Waitaki remains committed to strengthening home-focused referral pathways and processes between service providers. Efforts are ongoing to review existing successful models, investigate technology-enabled solutions, and seek funding opportunities to further support this work.
2. The Arts, Culture and Libraries team, collaborating with the Strategic Communications & Engagement team, has delivered 14 Mātauranga Māori programmes between September and November, and is planning a series of evening events to promote diversity and cultural competence in the community. They have also organised a Matariki programme, including community events and the George Burns Memorial children’s art exhibition with a Matariki theme, in June in conjunction with the public holiday.
3. Between June 14 and July 31, 2025, a total of ten submissions were made, comprising six direct Council submissions and four in collaboration with Taituara. The direct Council submissions included the Building and Construction (Small Stand-Alone Dwellings) Amendment Bill, as well as the Resource Management - National Direction Packages 1-3, which focused on infrastructure and development, the primary sector, and freshwater, along with Package 4, which addressed housing growth. The Taituara partnership submissions covered topics such as the Regulatory Standards Bill, the National Infrastructure Plan, and the Resource Management - Integrated National Direction Packages 1-3.

4. The OKR team is updating seasonal sports licences to require reporting of player data from sporting codes, further improving the Council's ability to track and promote participation.

KPI 2c – Prosperous District	
Objective: Develop and enable a thriving district economy, characterised by sustainable and inclusive growth	
Strategic Framework: <ul style="list-style-type: none"> • Attracting new opportunities • Supporting local businesses • Fostering a diverse and resilient economy 	
Key Results: <i>(series of results that will enable successful delivery of the objective)</i> <ol style="list-style-type: none"> 1. Support and grow the district's primary sector 2. Revitalise our places (CBD and townships) through opportunities to support businesses, homes, and visitors 3. Increase visitor economy return 4. Enhance business innovation and growth 5. Increase the skills base available to employers in the district and improve opportunities within the district for skills development 	Key Measures: <i>(initial measures, but not limited to these measures)</i> <ul style="list-style-type: none"> • By facilitating at least two new feasibility studies by the end of the financial year to enable land and water use optimisation and supporting innovation and secondary industry opportunities • By activating 50% of CBD vacant spaces by the end of the financial year (excludes Palmerston CBD); AND By measuring the resulting economic impact by December 2025. • By generating >15% increase in overall annual visitor spend through increased overnight stays • By supporting a minimum of 10 startups to become established through an entrepreneurship ecosystem • By creating career pathways for at least 50 people into employment across diverse business sectors

Progress Update:

1. The Waitaki Grown initiative, a collaboration between the Waitaki District Council and local farmers, aimed to encourage land use diversification and boost economic resilience by developing new crops and accessing high-value markets. The first harvest of medicinal crop trials has yielded promising phytochemical results from four root crops: Astragalus, Baical Skullcap, Liquorice, and Withania (Ashwagandha).

These initial results demonstrate the potential for cultivating high-value medicinal plants in the Waitaki region. The findings, obtained through laboratory testing, will help the project team refine cultivation strategies in the coming year.

Waitaki Grown is exploring future research partnerships, including applications in animal health and soil wellbeing. These efforts align with a broader vision for integrated land use systems that promote both environmental and economic sustainability across the district.

2. The Revitalise our Places Ōamaru (ROPO) programme concluded in December 2024, leading to two businesses arranging short-term leases for vacant Thames Street spaces. Community projects from the Central Ōamaru Masterplan are progressing. Thames Street facade renovations began in May as stage one, with stage two planned for Spring 2025. Several placemaking initiatives were finished this quarter, including the adoption of the Ōamaru North Masterplan. A new Waitaki identity and story has been developed to boost reputation and community pride, and new Gateway and Township signage will be the first visible step in this initiative.
3. Tourism in the Waitaki District saw mixed results over the last year. Expenditure grew 6.3% to \$202 million by September 2024, outpacing Otago and national rates. Guest nights jumped 11.4%, totalling 467,700. By December, expenditure growth eased to 2.5% (\$204 million), trailing regional and national averages, though international spending surged 20.7% from a low base. Guest nights kept rising, up 7.6% to 475,600. However, by March 2025, tourism spending fell 2.4% to \$204 million. April data showed renewed growth, with international spend up 19.3% year-on-year, despite making up only 7% of the total. Guest nights edged up 0.9% to 471,100, bucking declines elsewhere. Overall, while spending fluctuated, rising guest nights and strong international growth point to a resilient Waitaki tourism sector.
4. This workstream is on hold due to resource constraints.
5. A dedicated Mayors Task Force for Jobs Officer has now been appointed to oversee the development of a new, in-house delivery model for the 2025/26 financial year. In terms of building capability, nine students have begun their studies toward a Bachelor of Applied Management through Capable NZ.

KPI 2d – Valued Environment	
Objective:	
Protect Waitaki's natural and built environment for present and future generations	
Strategic Framework:	
<ul style="list-style-type: none"> Protecting our diverse landscapes and water bodies Meeting Environmental and climate change challenges 	
Key Results: <i>(series of results that will enable successful delivery of the objective)</i>	Key Measures: <i>(initial measures, but not limited to these measures)</i>
1. Provide leadership to support sustainable long-term community resilience.	<ul style="list-style-type: none"> By implementing a minimum of eight climate sustainability and/or resilience projects
2. Enable environmental ownership and protection in the community through education, incentives, and collaboration.	<ul style="list-style-type: none"> 100% allocation of the Heritage, Biodiversity, and Waste Minimisation Funds
3. Establish and implement robust strategies that promote the long-term protection and	<ul style="list-style-type: none"> Ensuring WDC achieves all national legislative planning standards by the end of the year

sustainability of Waitaki's natural and built environment.	
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Progress Update:

1. The Council remains actively engaged in collaborative meetings with the Otago Climate Officers Group (OCOG) and the Canterbury Climate Partnership Plan (CCPP), where we consistently share and provide relevant information to support the objectives of these partnerships.
2. A significant portion of the Biodiversity and Heritage funds—about 50-60%—has already been allocated, with a new funding round set for February 2025. The 2024 Waste Minimisation Fund was fully distributed in August 2024, supporting initiatives such as a Construction and Demolition waste tradie breakfast, regional webinar, and the Repair Cafe. Waste staff aided in diverting food waste from a Netflix film shoot, and the Waste Free Waitaki social media continues to promote waste minimisation. The Enviroschools kaupapa remains active in fostering youth sustainability efforts. Recent highlights include a Biodiversity Hui that drew around 40 participants and strong demand for the Waitaki Biodiversity Fund, which received three applications totalling more than twice the remaining annual budget. Additionally, the Waitaki Heritage Fund Sub-Committee awarded \$13,753 to three successful applicants in June 2025, representing 14% of the fund due to low application numbers.
3. The Proposed Waitaki District Plan was notified for public consultation on 1 March 2025, with the submission period closing on 16 May 2025. During this time, a total of 314 submissions were received from the community. These submissions have now been recorded in a dedicated database, and a comprehensive summary is currently being prepared. Subject to Council direction in light of the government's Plan Stop announcement and proposed legislation, and the result of any exemption requests made to the Minister, hearings on selected topics are anticipated to commence in late 2025 or early 2026.

KPI 3 – LEADERSHIP

KPI – Overarching Leadership	
Objective: As the employee of the Governance Team, lead the staff of Council to achieve other key initiatives in the Strategic Framework and programme of priorities.	
Strategic Framework: <ul style="list-style-type: none"> • Prosperous District • Strong Communities • Quality Services • Valued Environment 	
Key ACTIONS: <i>(series of ACTIONS that will enable successful delivery of the objective)</i> 1. Plan developed and executed for the next stage of the Economic Development Strategy	Key Measures: <i>(initial measures, but not limited to these measures)</i> <i>It is not appropriate to have measures for this KPI as it is identified as an overarching leadership objective for the Chief Executive.</i>

<p>2. Development and implementation of a Communications and Community Engagement Strategy and approach</p> <p>3. Delivery of a new Waitaki Sports and Events Centre that meets the “must have” requirements</p> <p>4. A strong partnership exists between the Council and iwi based on trust, understanding and shared aspirations; Council is fulfilling the Te Tiriti commitments</p> <p>5. Successful adoption of a fit for purpose, transformative, Long-Term Plan that sets a direction for the district and its communities and a focus for what and how the Council will deliver to support this</p> <p>6. As part of the LTP, review CCOs and progress new arrangements to support delivery of Council target outcomes and objectives.</p> <p>7. Development of a Water Services Delivery Plan and Partnership Development for waters with other councils</p>	<p><i>The development and implementation of each of the Key Actions in the left column will be the deliverables in this case.</i></p>
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Progress Update:

- Following the direction from the LTP process where this matter was consulted on again, a plan to repurpose Tourism Waitaki as an Economic Development Agency will be developed and brought back to Council. It is proposed to engage Tourism Waitaki in this process.
- Following the Council's adoption of the Communications and Engagement Strategy 2025–28 in July, implementation is now underway. Initial priorities have centred on enhancing internal capability, including the development of a new Communications Toolkit for staff. The phased introduction of the new Council brand has also commenced. Concurrently, work continues on establishing a Community Engagement Framework to promote more consistent and inclusive engagement across Council initiatives. Preliminary feedback has been favourable, with staff noting greater clarity and confidence in communication planning.
- The construction work is progressing well being on time and on budget. The roof cladding, pouring concrete for floor slab in cricket area, blockwork installation is complete, and the installation of internal wall electrical and IT cables has commenced. Planned works include external wall cladding installed, completion of cabling with commencement of interior wall linings installation.

4. Te Rūnanga o Moeraki have recently appointed a new Chief Executive, and discussions are progressing the further development of the partnership between Council and TROM and where this can bring benefits to our communities.
5. The 2025-34 LTP was adopted by Council on 30 June 2025.

The LTP document has been updated to align with the new organisational structure, reducing its length from 500 pages to 200 pages to improve readability. Following adoption, Council decided to retain water services delivery in-house rather than joining a joint CCO. Consideration is now being given to the preparing an amendment to the 2025-34 LTP, which would update the plan to reflect the proposed water services delivery model and set the path for an in-house business unit.
6. The Water Services Delivery Plan is moving forward for in-house delivery, with a draft submitted to the Government Department of Internal Affairs on 31 July.

PROGRESS WITH OTHER KEY WORK

In summary, other areas on which the Chief Executive continues to engage are:

- Regular meetings with Council Controlled Organisation Chief Executives and Boards.
- Regular meetings with other Waitaki Chief Executives.
- Otago Chief Executives Forum, for which the CE is currently the Chair.
- Otago Mayoral Forum.
- Otago Civil Defence Executive Group.
- Otago Civil Defence Joint Committee.
- Canterbury Chief Executives Forum.
- Canterbury Mayoral Forum.
- Waitaki Events Centre Project Board meetings.

Annual Elected Member Survey 2025

Conducted by Arlene Goss, Governance Services Lead

Introduction

A lot of change has taken place in the governance support space due to the Transformation Project, staff changes and new roles. This includes actions from the Governance Improvement Project, the introduction of locality officers and changes to performance reporting.

The purpose of this anonymous survey is to set a benchmark so governance support staff can monitor trends in elected member satisfaction over time - and as further changes take place. The survey was conducted for the first time at the end of the 2022-2025 triennium.

Executive summary

20 out of 21 elected members (and one independent member) responded to the survey. About half were councillors and half were community board members.

When asked about their experience **overall**, 77% said they were satisfied with the advice and support provided to them by council employees and invited experts.

However, when questioned in more detail about different aspects of that advice and support, they generally gave lower scores.

Most elected members said they were satisfied with the verbal and written support they received from staff. But they were less happy about the proactiveness and timeliness of the communication.

They were mostly satisfied with the support they received in the areas of meeting administration, agendas and minutes. But they wanted more support with professional development, technology, and health and wellbeing.

When asked if they agreed or disagreed on statements related to their role, 65% disagreed with the statement "I am usually making high-level decisions at a governance level and not being distracted by minor or operational matters." This showed the elected members were "getting down into the weeds" more than they needed to.

Interestingly, 91% disagreed with the statement that "meetings and workshops are held too frequently." This goes against a commonly held staff belief that elected members have busy lives and want to meet less often.

The "further comments" provided at the end of the survey were generally positive and helpful.

What happens next?

Staff will work towards some of the priorities mentioned in the survey.

These include:

- Setting up a resolution register.
- Promoting constructive engagement between elected members and staff.
- Planning induction sessions to help address some of the issues raised.
- Putting more emphasis on support for the elected members with professional development, technology and health/wellbeing.

This survey will be conducted again in August 2026 and annually after that to determine trends.

Responses Overview Active

Responses

21



Average Time

09:02



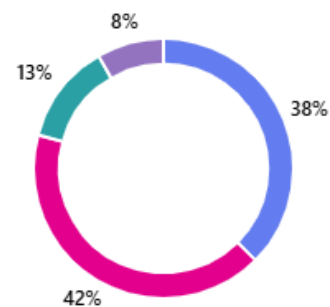
Duration

11 Days



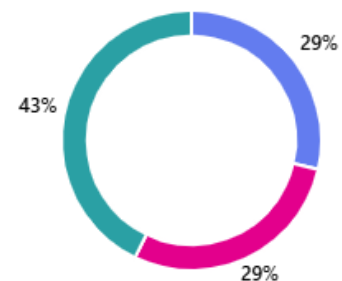
1. What roles do you fill as an elected member? (you can tick more than one)

● Mayor or councillor	9
● Community board member	10
● Committee member	3
● Other	2



2. How long have you been an elected member?

● I'm in my first triennium.	6
● I'm in my second triennium.	6
● I've been an elected member for three or more trienniums	9



3. Are you a chairperson?

● Yes 11
● No 10



4. Thinking about your recent interactions with council staff, how satisfied are you with the delivery of the following aspects of advice and support?

● Very satisfied ● Satisfied ● Neutral ● Dissatisfied ● Don't know/not applicable

Verbal advice from staff

Written advice from staff

Proactiveness of communication

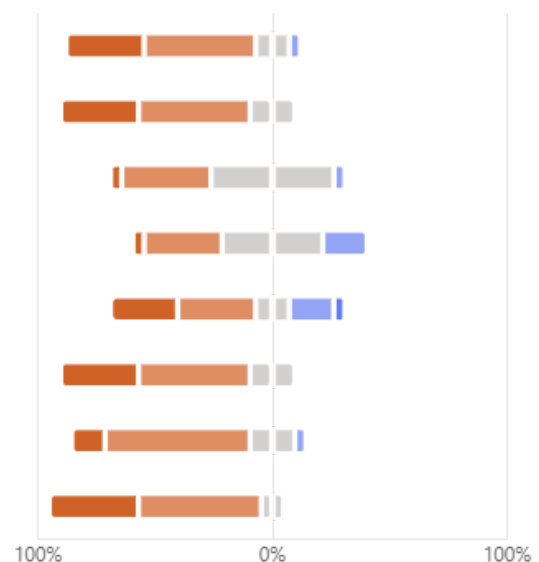
Timeliness of advice and information

Responsiveness to general requests and enquiries

Meeting agendas

Workshop documents

Minutes



5. How satisfied are you with the support available for you to fulfill your governance role?

● Very satisfied ● Satisfied ● Neutral ● Dissatisfied ● Don't know/not applicable

Professional development/training opportunities

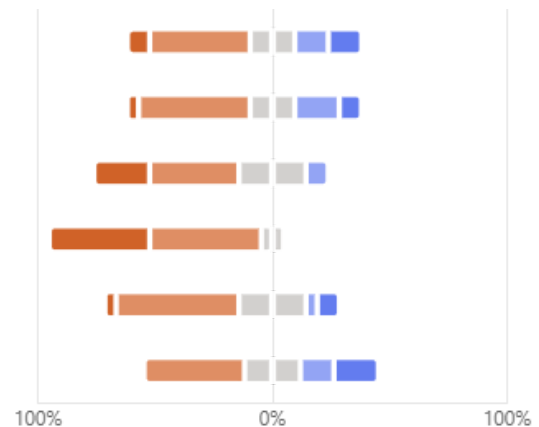
Technology support

Remuneration and expenses support

Meeting administration support

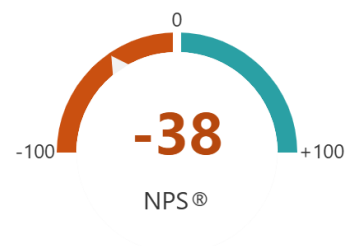
Support to engage with the community

Health and wellbeing support



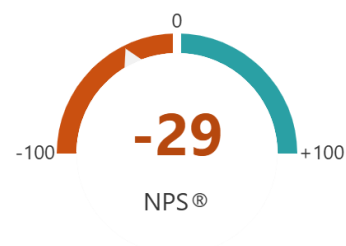
6. Agree or disagree: "Reports are easy to understand and logical."

Promoters	3
Passives	7
Detractors	11



7. Agree or disagree "Agendas are an appropriate size to read in the time available."

Promoters	4
Passives	7
Detractors	10



8. Agree or disagree: The information provided in agendas and at meetings is enough for robust decision-making.



9. Agree or disagree: "Meetings and workshops are held too frequently."



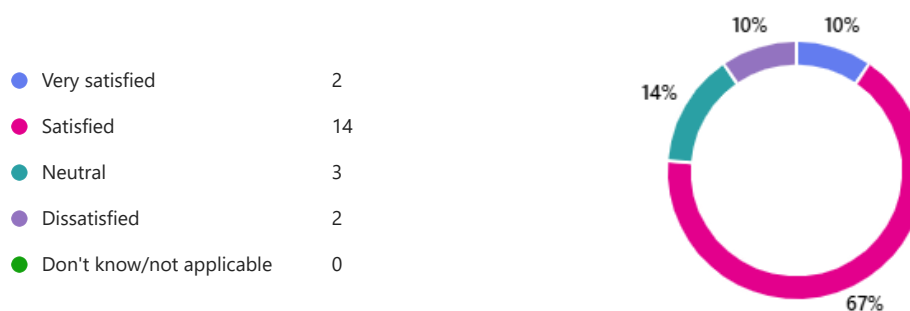
10. Agree or disagree: "I am usually making high-level decisions at a governance level and not being distracted by minor or operational matters."



11. Agree or disagree: "I feel confident responding to members of the community when they come to me for help."



12. Thinking about your experience **overall**, how satisfied are you with the advice and support provided to you by Waitaki District Council employees and invited experts?



13. What should staff prioritise in the coming year to better support the elected members?

21
Responses

Latest Responses

"I think it's more what the Councillors need to do to stay on track. Staff ..."

"Staff need to engage earlier with EMs to assist with information and e..."

"Knowing their job and how it works being prepared for the meetings ..."

...

6 respondents (30%) answered staff for this question.

Update

Board meetings previous meeting staff and procedures agenda meetings members of the community
information for other members council meetings forward meeting
meetings and workshops **meetings** **staff** **information**
council staff working decisions members GT members
representatives and staff link for each meeting staff are available

14. Any final comments?

21

Responses

Latest Responses

"I am really pleased with the new governance support model and think ..."

"No"

"Find keeping a relationship with staff , solves problems quicker .Knowi... "

...

6 respondents (30%) answered staff for this question.

 Update

environment for both staff engagement by all staff Governance staff
staff more comfortable early days staff and the community easy
roles with staff governance staff community help
members put into meetings members information times staff with EMs
relationship with staff staff and communication
staff are now more engaging

6 RECOMMENDATIONS FROM COMMITTEES REPORTS

**6.1 RECOMMENDATIONS OF THE PERFORMANCE, AUDIT AND RISK COMMITTEE
MEETING HELD ON 29 JULY 2025**

Author: Arlene Goss, Governance Services Lead

Authoriser:

RECOMMENDATION

That Council:

1. Adopts a Treasury Strategy for the first quarter of the 2025-26 financial year which includes:
 - a) Monitoring available cash and projecting future cash requirements
 - b) Liaising with the Local Government funding Agency (LGFA) to ensure Council's ability to function and deliver on behalf of its communities is not impeded by lack of funds
 - c) Obtaining advice and support from Bancorp Treasury Services on key projects in addition to ensuring compliance with policy limits
 - d) Investing funds considered surplus to immediate requirements based on current forecasts to best advantage to maximise returns.

**1. MINUTES OF PAR MEETING - TREASURY STRATEGY, FY 2025-2026 FIRST
QUARTER**

The circulated report discussed Council's proposed Treasury Strategy for the first quarter of the 2025-26 financial year, reviewed the benefits arising from Council's membership of the Local Government Funding Agency (LGFA), and considered the recommendations put forward by officers.

Chief Financial Officer Amanda Nicholls spoke to the report, noting it proposed continuing the same approach to the Treasury Strategy as previous quarters, aiming to maximise investment returns while keeping borrowing costs low. Ms Nicholls then responded to questions from committee members.

There was discussion regarding whether some of the funds sitting in Council's call account could be placed in a term deposit with higher yield. It was explained that the fund balances in the call account were kept as low as practical and only forecast to be there for a short-term period.

It was noted by the Chair that the report didn't accurately reflect the current market situation, as the OCR has been consistently decreasing since 2023, not only for the past six months as stated in the report. It was noted that the reference in the report to increased borrowing costs due to changes to the OCR over the past two years was therefore incorrect.

It was also noted that the future borrowing forecasts for the next nine years as presented in the report did not include water services capital expenditure. Following Council's decision regarding Southern Water Done Well, the forecasts are being reworked to include water services capital expenditure.

It was acknowledged work would need to be done to update the Treasury Strategy in light of reworked future borrowing forecasts, including reviewing the pros and cons of getting a credit rating and analysing borrowing limits and debt ratios. This would involve working with Bancorp.

It was suggested that Bancorp be invited to attend the next Council workshop on the Council's Water Services Delivery Plan.

RESOLVED PAR 2025/001

Moved: Member Jim Hopkins

Seconded: Deputy Mayor Hana Halalele

That the Performance, Audit and Risk Committee recommends:

That Council:

1. Adopts a Treasury Strategy for the first quarter of the 2025-26 financial year which includes:
 - a) Monitoring available cash and projecting future cash requirements
 - b) Liaising with the Local Government funding Agency (LGFA) to ensure Council's ability to function and deliver on behalf of its communities is not impeded by lack of funds
 - c) Obtaining advice and support from Bancorp Treasury Services on key projects in addition to ensuring compliance with policy limits
 - d) Investing funds considered surplus to immediate requirements based on current forecasts to best advantage to maximise returns.

CARRIED

7 DECISION REPORTS

7.1 LOCAL WATER DONE WELL WATER SERVICES DELIVERY PLAN MODEL CONFIRMATION AND ADOPTION

Author: Paul Hope, Director Support Services

Recommender: Paul Hope, Director Support Services

Authoriser: Alex Parmley, Chief Executive

ATTACHMENT: The Waitaki District Council Water Services Plan will be circulated separately to this agenda and will also be posted on the council website before the meeting.

PURPOSE

The purpose of this report is to present several recommendations in relation to the Waitaki District Council Water Services Delivery Plan (WSDP) to allow the submission of the (WSDP) to the Department of Internal Affairs (DIA) by the statutory deadline of 3 September, 2025.

The WSDP reflects the decision made on 8 July 2025 to adopt an In-house approach as the preferred water service delivery model. There are also three matters that have been discussed in public workshops that now require decisions. It also seeks approval of the attached WSDP, with amendments as required, for certification by the Waitaki District Council Chief Executive and submission to the Department of Internal Affairs by 3 September 2025.

EXECUTIVE SUMMARY

Council has considered matters in relation to the Local Water Done Well water reforms on numerous occasions. The most recent consideration was on 8 July 2025 when the decision was to undertake future water service delivery In-house. Since then, additional work has been undertaken to allow the development of a WSDP that reflects that decision. The results of this work have been presented in five public workshops. The WSDP presented at this meeting reflect the discussions that took place in these workshops.

OFFICER RECOMMENDATION

That Council:

1. Approves the following changes to information previously considered to be included in the Water Services Delivery Plan:
 - a) Additional budgeted expenditure of \$9,790,000 to address compliance issues identified in the WSDP development process.

- b) Additional expenditure of \$9,450,000 to address resilience and renewal issues identified in the WSDP development process.
 - c) To increase charges in an approach to achieve a balanced budget and revenue sufficiency to meet operational, investment and borrowing costs.
2. Approves the Water Services Delivery Plan, subject to any adjustments required by the above decisions, set out in Attachment 1 for submission to the Department of Internal Affairs by 3 September 2025 for acceptance.
 3. Notes that in accordance with section 18 of the Local Government (Water Services Preliminary Arrangements) Act 2024, the Chief Executive must provide certification to the Department of Internal Affairs in respect of the information provided by Waitaki District Council that the Water Services Delivery Plan complies with the Local Government (Water Services Preliminary Arrangements) Act 2024 and that the information contained in the plan is true and accurate.
 4. Delegates to the Chief Executive the authority to finalise the plan including making minor amendments to the Water Services Delivery Plan (if required) in advance of submission to the Department of Internal Affairs.
 5. Notes the willingness of the Council to explore future opportunities for collaboration with other Councils in relation to water services delivery.

CONTEXT, ANALYSIS AND ADVICE

Background and Current Situation

Under the Government's Local Water Done Well Legislation Councils are required to assess and agree a preferred water services delivery model that is financially sustainable, meets government regulatory standards, and supports long-term community outcomes. Councils must identify and evaluate options, select a preferred option, consult with their community, consider feedback alongside technical and financial analysis, and decide on the option to adopt for the future delivery of water services. Councils must prepare and adopt a WSDP, which outlines how the chosen model will deliver compliant and sustainable water services, before submitting it to the DIA for review and acceptance. If accepted the Council is legally bound to deliver the plan. The DIA will apply the following three tests in the assessment of the WSDP and whether the Council's water services delivery is financially sustainable:

- Revenue sufficiency – is there sufficient revenue to cover water services delivery costs, including servicing debt
- Investment sufficiency – is the projected level of investment sufficient to meet regulatory requirements and provide for growth
- Financing sufficiency – are funding and finance arrangements sufficient to meet investment Requirements

In March 2025, Waitaki District Council joined with Gore, Clutha and Central Otago District Councils to form Southern Water Done Well (SWDW), to investigate water services delivery options that meet the legislative requirements of Local Water Done Well. A joint CCO with these councils was the preferred option, and was further investigated along with an In-

house, stand-alone CCO and CCO with Waimate, Timaru and Mackenzie District Councils that were presented to the community as part of the required LWDW consultation.

The results of the consultation were considered at a meeting on 8 July 2025, and the following was resolved:

<p>RESOLVED WDC 2025/001</p> <p>Moved: Cr Tim Blackler Seconded: Cr Courtney Linwood</p> <p>That Council:</p> <ol style="list-style-type: none">1. Agrees to adopt an enhanced in-house water services delivery unit for a minimum of two years as the Council's model for the delivery of water services in accordance with section 13(1)(k) of the Local Government (Water Services Preliminary Arrangements) Act 2024.
<ol style="list-style-type: none">2. Requests staff to prepare a Water Services Delivery Plan that complies with matters set out in section 13 of the Local Government (Water Services Preliminary Arrangements) Act 2024 and the Council's chosen proposed water services delivery model, to be brought back to Council for consideration, approval and certification by the Waitaki District Council Chief Executive prior to being submitted to the Department of Internal Affairs by 3 September 2025 for acceptance.
<ol style="list-style-type: none">3. Will exercise its right to exit the joint arrangement with Central Otago, Clutha and Gore under the current commitment agreement.
<ol style="list-style-type: none">4. Agrees to further discuss details surrounding the future management of water at another time and requests staff to prepare an outline with input from Elected Members for a workshop to that effect. For clarity, this future discussion is to explore key issues or themes raised through the consultation and investigation to date. It would also include looking at the various models adopted by other councils and highlighting matters for further investigation and focus - including exploring the feasibility of a future shared services/Joint CCO approach with South Canterbury Councils.
<ol style="list-style-type: none">5. Notes the public submissions received and thanks all submitters for their feedback.
<p>The Mayor then moved a further motion as below and it was seconded by Cr Hopkins. He gave his reasons for adding this to the list of resolutions, which included the need to get a better understanding of the complexity and challenges.</p>
<p>RESOLVED WDC 2025/002</p> <p>Moved: Mayor Gary Kircher Seconded: Cr Jim Hopkins</p> <p>That Council instructs staff to provide clarity to the community and regular updates as immediately as possible, on how much more the in-house options will cost them over the joint Southern Group CCO, according to the most up-to-date modelling available.</p> <p style="text-align: right;">CARRIED</p>

As a consequence of the above, the remaining SWDW Councils were advised of the decision, and a formal withdrawal notice has been supplied. This has been accepted. It

should be noted that all three Councils have resolved that Waitaki DC can rejoin the grouping later if it so desired.

This report seeks to address the matters set out in other matters covered in these resolutions.

Analysis and Discussion

Officers and various advisors, principally Morrison Low Advisory, have undertaken additional work and analysis to prepare a WSDP based on an In-house delivery approach. This work also considered feedback from the Department of Internal Affairs (DIA) on a draft WSDP they requested Council to supply. This additional work and other issues have been presented to Council and the community in a series of public workshops held on 22, 29 July and 5, 12 and 19 August.

During this process two key matters were identified where it was considered that modification is needed to be made to the information contained in the consultation material and subsequently presented in the draft WSDP.

Additional Expenditure

As a result of considering the feedback from the DIA it has been determined that bringing forward items previously deferred would address more directly the compliance matters raised by the DIA to ensure that the plan passes the investment sufficiency test. It is therefore recommended that the following items that were presented at the 19 August 2025 workshop be added in to the WSDP.

Project name	Activity	Change	Explanation
Lower Waitaki Capacity Upgrade	Water	\$2,170,000	Restored to original budget to accommodate connection to Oamaru to reduce nitrates
Otematata DWS Upgrade	Water	\$500,000	Updated per Josh's latest costings
Universal Water Metering	Water	\$4,000,000	Updated per Josh's latest costings, brought forward based on elected member feedback
UV upgrades at 4 supplies- investigation	Water	\$800,000	Restored to ensure DWS compliance
Awamoko Drinking Water Supply Upgrade	Water	\$700,000	Updated per Josh's latest costings
Tokarahi Drinking Water Supply Upgrade	Water	\$100,000	Updated per Josh's latest costings
Kauru Hill Drinking Water Supply Upgrade	Water	\$60,000	Updated per Josh's latest costings
Oamaru Wastewater Treatment Plant upgrade as a result of resource consent requirements	Wastewater	\$960,000	Added preliminary costs to meet consent renewal date
Oamaru Wastewater Relocation/Renewal - Orwell St	Wastewater	\$500,000	Added preliminary costs for rock wall, brought forward costs to reflect consents, design, land purchase and other preliminary work
Total		\$9,790,000	

In addition to these compliance related matters, there were another group of deferred projects that addressed renewal and resilience issues identified by the DIA, again to ensure

the plan passes the investment sufficiency test. It is recommended that these also be included in the WDSP.

Project name	Activity	Change	Explanation
Oamaru Wastewater Main Renewals	Wastewater	\$900,000	Increase wastewater mains renewal budget to restore earlier budget. Improves environmental compliance
Additional Wastewater Monitoring	Wastewater	\$250,000	Operational cost. This will improve design outcomes and effectiveness of solutions- spend to save through improved upfront planning
Condition Assessment of Water Infrastructure	Water	\$300,000	Operational Cost. To increase understanding of useful lives of cast iron pipes allowing extension to investment
District Wide water resilience reservoirs	Water	\$5,000,000	To address existing water network resilience issues that will be required to be addressed under Taumata Arowai anticipated future regulatory work
Network extensions	Water and Wastewater	\$3,000,000	Needed to support growth in revised district plan in areas currently not connected
Total		\$9,450,000	

Amended Revenue Flows (smoothing)

Another matter discussed at the 19 August workshop was ways to address the concerns about the level of increased charges in the 2028 financial year. Scenarios were presented showing how a graduated approach could be used and the impact of this approach. The primary impacts of this change would be to have an impact on debt levels and charges, particularly in the later years. However, the impact of smoothing, whilst graduating increases, does not overall reduce the increase required. In addition, the smoothing of charges could have a detrimental impact on the Council's ability to secure a necessary credit rating as it places waters and the Council in a position of not having a balanced budget going forward. For this reason, smoothing in charge / rate increases is not recommended.

Other Matters - Additional Workshop Discussions

Other matters were considered in more detail following the 8 July decisions. These primarily focused on the impact on Council as a whole with water services being delivered in-house. These discussions included the availability of debt and funding for other services, project deliverability and potential services level changes. The need to amend the Long-Term Plan

were also discussed. These matters will be addressed in future reports and are therefore not directly addressed in the decisions covered in this report.

Others Matters – South Canterbury Councils and SWDW Councils Decisions

At the time of producing this report there is no proposal that has been developed for the three South Canterbury Councils to work together on water services matters. The current approach of the three councils is:

- Timaru DC– Consulted on a stand-alone CCO as their preferred approach. Considered making a request to join SWDW at an emergency Council meeting on 12 August but no decision was made. Yet to approve a WSDP.
- Mackenzie DC– Consulted on a stand-alone CCO as their preferred approach however selected the option for an In-house model at a meeting on 15 July. Considering a draft WSDP on 19 August.
- Waimate DC – Consulted on an in-house option as their preferred approach. Confirmed as the preferred approach on 1 July. Considering a WSDP at a meeting on 19 August.

The three remaining SWDW Council have all approved the joint WSDP for submission to the DIA. In addition to approving the WSDP all three resolved to allow Timaru and Waitaki to join SWDW if they so desired. No action has been taken on this.

Updated Water Services Delivery Plan

The attached WSDP has been prepared based on the information previously received by Council and the attached and further analysis prepared by Morrison Low in response to the Council resolution on 8 July 2025. The attached WSDP has been written to satisfy the requirements of the Local Government (Water Services Preliminary Arrangements) Act 2024 and as set out in the DIA templated guidance. The WSDP has been reviewed by Council staff to ensure legislative compliance. DIA have also provided initial feedback on the WSDP, including a financial sustainability assessment and compliance with the legislative requirements set out in section 13 of the Local Government (Water Services Preliminary Arrangements) Act 2024. The DIA provided an initial review of the WSDP on 11 August 2025. The draft plan has been updated to address matters raised in the feedback and is considered to meet the requirements of section 13 and 14 of the Local Government (Water Services Preliminary Arrangements) Act 2024.

Financial Considerations

The financial implications for ratepayers and impact on overall Council debt are included within the WSDP

Risks

The risks presented to Council in July 2025 have been reviewed based on the further analysis by Morrison Low and matters presented in this report. Overall, there has been no material change in either nature of the risk or its potential impact.

Risk	Impacts
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WSDP is not submitted by 3 September 25 statutory deadline	<ul style="list-style-type: none"> • Reputation risk for Councils • Potential DIA intervention with associated loss of decision-making control
DIA does not approve the WSDP and requires the document to be revised.	<ul style="list-style-type: none"> • DIA requires the group of Councils to alter the WSDP • DIA requires the group of Councils to change the operating model design • DIA requires other Councils to join the group of Councils before the WSDP is accepted and appoints a Crown Facilitator or Water Services Specialist
Ratepayers do not appreciate the impending costs increases for 3 Waters Services – irrespective of the delivery model adopted	<ul style="list-style-type: none"> • Increasing affordability issue for larger group of ratepayers • Negative publicity and reputation risk for Councils
Transition planning may reveal that actual transition costs are greater than forecast given the level of analysis to date as it was not the preferred option	<ul style="list-style-type: none"> • Potential increase in project budget • The transition approach may require revision.
Council does not secure a credit rating to allow an increase in borrowing limits	<ul style="list-style-type: none"> • Inability to implement WSDP creating regulatory compliance issues • Increasing affordability issue for larger group of ratepayers • Negative publicity and reputation risk for Councils
Changes to legislation through Bill 3 may require additional resource commitments and amendments to arrangements.	<ul style="list-style-type: none"> • Cost and time associated with rework • Potential increase in project budget • Additional council resource commitments

SIGNIFICANCE AND ENGAGEMENT

This decision is of high significance in accordance with the Council's Significance and Engagement Policy due to the financial, operational and governance implications for Council and the community. The decision will shape Council's approach to water service delivery for the next decade and beyond.

SUMMARY OF OPTIONS CONSIDERED

Assessment of Preferred Option

The following table provides an update of the advantages and disadvantages of each option presented in the recommendations of this report.

Options Analysis – Adopt Water Services Delivery Plan

Options	Advantages	Disadvantages
<p>Council adopts the Water Services Delivery Plan attached as attachment 1 to be submitted to the Department of Internal Affairs by 3 September 2025.</p>	<ul style="list-style-type: none"> • The attached WSDP is informed by updated (and previous) analysis which notes ratepayers of the three SWDW Councils will be financially better off through the establishment of a Southern WSE. Initial financial analysis also shows the benefits of the inclusion of additional councils. • Takes account of the DIA assessment on 21 July 2025 that a jointly owned CCO is likely the only viable option to meet the legislated financial sustainability requirements. • Consistent with Council's decision on 8 July 2025. • Meets the legislative deadline for the submission of the WSDP to DIA by 3 September 2025. 	<ul style="list-style-type: none"> • No disadvantages identified
<p>Council does not adopt the Water Services Delivery Plan attached as attachment 1 to be submitted to the Department of Internal Affairs by 3 September 2025.</p>	<ul style="list-style-type: none"> • No advantages identified. 	<ul style="list-style-type: none"> • The attached WSDP will not be submitted to DIA. • Insufficient time to prepare an alternative WSDP to meet DIA deadline of 3 September 2025. • Highly likely to result in actions by the DIA under Subpart 2 of the Local Government (Water Services Preliminary Arrangements) Act 2024 including appointment of a Crown Facilitator or Water Services Specialist.

<p>Council authorises the Chief Executive to make minor amendments to the Water Services Delivery Plan (if required) in advance of submission to the Department of Internal Affairs.</p>	<ul style="list-style-type: none"> • Allows minor amendments to be addressed by the Chief Executive(s) without having to reconvene Council. • Council has visibility overall all minor amendments to the WSDP. • No advantages identified. 	<ul style="list-style-type: none"> • No disadvantages identified. • Slow timelines to finalise and submit the WSDP. • Creates risk of not meeting the DIA deadline by 3 September 2025. • Will require additional Council decision making and meetings to agree even minor amendments to the Commitment Agreement.
<p>Council does not authorise the Chief Executive, in conjunction with the Chief Executives of to make minor amendments to the Water Services Delivery Plan (if required) in advance of submission to the Department of Internal Affairs.</p>		

Linkage to Strategic Plan Priorities

Councils must revisit and most likely formally amend the Long-Term Plans (LTP) and associated supporting strategies (including Financial & Asset Management Strategies), to reflect the water service delivery adopted and that it complies with Local Water Done Well legislation requirements. This will need to be undertaken in FY 26/27.

NEXT STEPS

The circulated WSDP will, subject to any minor amendments, be prepared for submission to the DIA by 3 September 2025.

The Chief Executives will certify that the WSDP meets the requirements of the Local Government (Water Services Preliminary Arrangements) Act 2024 (including financial sustainability requirements) and that the information provided by its Council is true and accurate, in advance of submission.

- Progress the development of a detailed implementation plan beyond that included in WSDP, including the identification and securing of resources to support the transition and implementation phase.
- Further updates on the transition plan and other matters associated with the implementation of the WSDP and associated impacts on Council as a whole will be brought back to the Council for approval.

**7.2 NOTICE OF MOTION - ESTABLISHMENT OF LOCAL WATER DONE WELL
INDEPENDENT ADVISORY GROUP**

Author: Arlene Goss, Governance Services Lead

Authoriser: Paul Hope, Director Support Services

Attachments:

1. **EXTRACT from Waitaki District Council Standing Orders - Notices of Motion Clause 27** [!\[\]\(950a62bbddad88d64435fd35607dfc42_img.jpg\)](#) [!\[\]\(80ae2b64037a63e4dd106d2cfb4205ab_img.jpg\)](#)
2. **Motion from Cr Blackler - Advisory Group Proposal** [!\[\]\(9e6b464392878bce7cea642e72141689_img.jpg\)](#) [!\[\]\(f5a23b4dd22b63e9bd2a86f3cac27ff1_img.jpg\)](#)

RECOMMENDATION

That Council:

1. Formally receives the Notice of Motion on the topic of “Establishment of Local Water Done Well Independent Advisory Group” which was emailed to the Chief Executive from Cr Tim Blackler on Monday 18 August, 2025, and which has been accepted by the Chief Executive for consideration at this meeting pursuant to Clause 27 of Waitaki District Council Standing Orders.

PURPOSE

The Chief Executive has received a Notice of Motion from Cr Tim Blackler, with the request that it be placed on the agenda for the 26 August 2025 Council Meeting.

The purpose of this report is to include that Notice of Motion in the agenda papers for this meeting as requested by the author, and to provide the opportunity for Cr Blackler, with the Mayor and other Councillors, to speak to the Notice of Motion, for officers to be able to respond to the Notice of Motion, and for Council to consider and agree an appropriate response.

SUMMARY

Notices of Motion are required to meet the requirements set out in Clause 27 of the Waitaki District Council Standing orders. A copy of Clause 27 is included as an attachment.

Cr Blackler’s Notice of Motion, as submitted, fully meets the requirements of Clause 27 of Standing Orders. It was sent to the Chief Executive via email and included Cr Blackler’s electronic signature as the mover. It was delivered to the Chief Executive more than five clear working days before this meeting.

Pursuant to the final paragraph in Clause 27.1, the Chief Executive, through this agenda report, is giving the Mayor and Councillors notice in writing that he has received the Notice of Motion from Cr Blackler on the topic of “Establishment of Local Water Done Well Independent Advisory Group” that was emailed to him.

- (d) Misrepresentation – to alert the chair to a misrepresentation in a statement made by a member, an officer or a council employee;
- (e) Breach of standing order – to highlight a possible breach of a standing order while also specifying which standing order is subject to the breach; and
- (f) Recording of words – to request that the minutes record any words that have been the subject of an objection.

26.3 Contradictions

Expressing a difference of opinion or contradicting a statement by a previous speaker does not constitute a point of order.

26.4 Point of order during division

A member may not raise a point of order during a division, except with the permission of the Chairperson.

26.5 Chairperson's decision on points of order

The Chairperson may decide a point of order immediately after it has been raised or may choose to hear further argument about the point before deciding. The Chairperson's ruling on any point of order, and any explanation of that ruling, is not open to any discussion and is final.

27. Notices of motion

27.1 Notice of intended motion to be in writing

Notice of intended motions must be in writing signed by the mover, stating the meeting at which it is proposed that the intended motion be considered, and must be delivered to the chief executive at least 5 clear working days before such meeting. [Notice of an intended motion can be sent via email and include the scanned electronic signature of the mover,]

Once the motion is received, the chief executive must give members notice in writing of the intended motion at least 2 clear working days before the date of the meeting at which it will be considered.

27.2 Refusal of notice of motion

The Chairperson may direct the chief executive to refuse to accept any notice of motion which:

- (a) Is disrespectful or which contains offensive language or statements made with malice; or
- (b) Is not related to the role or functions of the local authority or meeting concerned; or

- (c) Contains an ambiguity or a statement of fact or opinion which cannot properly form part of an effective resolution, and where the mover has declined to comply with such requirements as the chief executive officer may make; or
- (d) Is concerned with matters which are already the subject of reports or recommendations from a committee to the meeting concerned; or
- (e) Fails to include sufficient information as to satisfy the decision-making provisions of s.77-82 LGA 2002; or
- (f) Concerns a matter where decision-making authority has been delegated to a subordinate body or a local or community board.

Reasons for refusing a notice of motion should be provided to the mover. Where the refusal is due to (f), the notice of motion may be referred to the appropriate committee or board.

27.3 Mover of notice of motion

Notices of motion may not proceed in the absence of the mover unless moved by another member authorised to do so, in writing, by the mover.

27.4 Alteration of notice of motion

Only the mover, at the time the notice of motion is moved and with the agreement of a majority of those present at the meeting, may alter a proposed notice of motion. Once moved and seconded, no amendments may be made to a notice of motion.

27.5 When notices of motion lapse

Notices of motion that are not moved when called for by the Chairperson must lapse.

27.6 Referral of notices of motion

Any notice of motion received that refers to a matter ordinarily dealt with by a committee of the local authority or a local or community board must be referred to that committee or board by the chief executive.

Where notices are referred, the proposer of the intended motion, if not a member of that committee, must have the right to move that motion and have the right of reply, as if a committee member.

27.7 Repeat notices of motion

When a motion has been considered and rejected by the local authority or a committee, no similar notice of motion which, in the opinion of the Chairperson, may be accepted within the next 12 months, unless signed by not less than one-third of all members, including vacancies.

Where a notice of motion has been adopted by the local authority, no other notice of motion which, in the opinion of the Chairperson has the same effect, may be put while the original motion stands.

Notice of Motion

Establishment of Future Water Services Advisory Group

Author – Tim Blackler

1. Recommendation

That Council;

- a. Request the Chief Executive to establish a Future Water Services Advisory Group.
- b. Agree that the remit of the Future Water Services Advisory Group is to provide advice and support to Council and the CE on:
 - i. Further development of the Water Services Delivery Plan should this be required.
 - ii. The development of the Implementation Plan for delivering water services in-house efficiently and effectively.
 - iii. engagement with a Government Water Services Facilitator or Specialist should one be appointed.
- c. Appoint an Elected Member to the Future Water Services Portfolio to work with the CE.
- d. Request the Chief Executive, working with the Future Water Services Portfolio Holder, appoint up to six members to the advisory group with the required skills and attributes highlighted in this report by mid-September.
- e. Delegate to the Chief Executive working with the Future Water Services Portfolio Holder the authority to establish any necessary further expectations, scope or structure to enable meaningful input.

2. Introduction:

- **Purpose of the Future Water Services Advisory Group:**

The establishment of an advisory group that brings together a series of desired skills, knowledge and perspectives to help shape conversation, questions, and outcomes in the possible requirement for further submission of a compliant WSDP, engagement with a facilitator/specialist (if appointed by The Minister) or, in shaping the necessary Implementation Plan to establish the in-house working arrangements that meet the legislative requirements, regulatory environment and community needs. This includes the opportunity for advice to provide support for the governance team.

- **Organisational Context:**

Our recent decision around Local Water Done Well and the move to achieve a compliant 'in-house' water service delivery function has required the need for a series

of focused and effective workshops. The intention is to ensure a more collaborative approach with internal and external input to enable the re-shaping and presentation a compliant WSDP and successful implementation of effective in-house water service delivery arrangements centred around recognised approaches to good asset management. This is critical to evidence a satisfactory approach to sufficiency of revenue, investment, financing and necessary environmental and safety compliance. Coupled with this is the need for a revenue policy that addresses affordability matters as is reasonably practicable.

- **Expected Benefits:**

It is expected that the establishment of the advisory group would lead to beneficial outcomes such as improved decision-making, access to specialised knowledge, best practise thinking, access to people invested in our decision and better likelihood of a compliant and achievable in house water service delivery arrangement that works within the already transformed organisational structure. It also allows the governance team to have confidence and assurance that the process was collaborative and offered the best chance for success.

2. Scope of Work:

- **Specific Objectives:**

To help inform and provide advice to assist with any further required preparation of a Water Services Delivery Plan that complies with matters set out in Section 13 of the Local Government (Water Services Preliminary Arrangements) Act 2024 and the Council's chosen proposed water services delivery model. This will be brought back to Council for approval and certification by the Waitaki District Council Chief Executive prior to being submitted to the Department of Internal Affairs by 3 September 2025 for acceptance and may require further input beyond this.

Following acceptance (or not) of the WSDP, the group will input into any further work requested by the Secretary, including revisions or amendments to the WSDP if needed; support for Council and the CE to engage with any appointed specialist or facilitator if appointed; and/or support the development of the necessary Implementation Plan for the successful establishment and implementation of in-house water service delivery.

The group will also be responsible for highlighting matters for future investigation and focus as they see fit while operational.

- **Key Areas of Focus:**

The advisory group's ethos will centre around the overarching principle of collaboration with the organisation and generating recommendations with key people in our team as part of this. The group's expertise will be most valuable focused on the following areas;

1. Build on (acknowledging the expertise we have in-house) our organisation's ability to show necessary strategy and focus in relation to best practise asset management.
2. Support our organisation to set up necessary areas of focus regarding compliant revenue & investment sufficiency, and policy that best addresses household affordability.
3. Helping our organisation to show necessary areas of focus in relation to a compliant approach to financing with sufficient headroom.
4. Helping our organisation to establish necessary areas of focus in relation to a compliant approach to compliance and safety under Taumata Arowai's newly proposed draft standards.
5. Helping to inform the delivery of an organisational arrangement or necessary changes to structure that fits within the organisation's current target operating model but provides the necessary resource to achieve efficiency and improvement in the delivery of water over time.

- **Deliverables:**

The advisory group would be expected to attend relevant engagements (having had access to any material in relation to water that they may request) and provide input into our progress and future direction. There may also be opportunity to engage with them less formally.

The advisory group would have the opportunity to meet jointly as a group when a recommendation is to be brought to the CE and Council.

Beyond the acceptance of the WSDP or further engagement with a specialist or facilitator, the group will continue to input into the in-house water service arrangements.

Further work around opportunities within our network for highlighting matters for further investigation and focus will also be considered - including exploring the feasibility of a future shared services/Joint CCO approach with other Waitaki entities or South Canterbury Councils

- **Timeline:**

The timeline for the advisory group's activities are to attend water related engagements at the request of CE or Elected Members to support the Water Service Delivery Plan or engage with a facilitator or specialist (if appointed).

The group will continue beyond this with a renewed set of objectives primarily focusing on the generation of an establishment plan outline for successful in-house water service delivery implementation.

The group will exist until the incoming council has established and appointed members to the formally decided governance and oversight structure.

3. Group Structure and Composition:

- **Membership:**

It is expected that the group will consist of;

4x local or out of district members with relevant knowledge (emphasis placed on local appointees where possible)

2x members of our organisation that have direct operational involvement

The expected skills and attributes coverage will include; being invested in the successful implementation of in-house water services delivery, asset management, working knowledge of our existing system and our new organisation structure, best practise water delivery in a provincial/rural context, systems implementation and design, utility reform, effective policy, and utility compliance.

- **Roles and Responsibilities:**

The roles and responsibilities of each member is to familiarise themselves with Waitaki District Council's current state where necessary but more importantly, be clear on the requirements of the Water Services Delivery Act, DIA & Commerce Commission expectations to offer perspectives during attendance at workshops which will help inform and shape successful delivery of a compliant WSDP and give rise to recommendations made around strategy for implementation of in-house water services delivery.

The chair will have administrative responsibilities around RFIs and delivery of any written recommendations.

- **Meeting Structure:**

Attendance and equal opportunity for input into the Council run WSDP sessions, subsequent workshops/briefings or engagement as an advisory group informally.

Communication Channels:

The group will have uninhibited access to any information in relation to compliant delivery of WSDP as they see necessary to inform their advice. The CE will provide a point of contact within the organisation for this to occur, and the CE and Elected Member appointee will be kept abreast of any information requested. The appointed chair of the advisory group will make the request for information.

If the advisory group wish to provide written advice, this will be done through the chair of the advisory group who will circulate this information with the CE and all councillors.

4. Governance and Operations:

- **Decision-Making Process:** The advisory group's perspectives and recommendations will be considered and integrated into the organisation's further refinement of WSDP where desired (if further changes are requested by The Secretary) and

recommendations around establishment planning and recommended actions for in-house water service delivery will be considered by Councillors and the CE.

- **Conflict of Interest Policy:** Members will have to declare and address any potential conflicts of interest.
- **Evaluation Process:** The advisory group's performance may be measured in the future (if continued) but the only expectation is active participation and a desire to offer perspective to ensure the necessary questions and directions are being canvassed to get the best in-house water service delivery arrangement that aligns with best practise.

5. Resources and Support:

- **Administrative Support:**

CE will delegate to provide the level of administrative support needed as indicated by the Chair of the advisory group, including meeting logistics, travel arrangements, and supply of information.

- **Access to Information:**

The CE or delegate will ensure the advisory group has access to relevant information and resources to carry out its work effectively.

- **Budget:**

Request to include an operating budget and allowance at the discretion of the CE.

6. Conclusion:

The organisation is under pressure to deliver an 'in-house' WSDP in a short period of time with external pressure being placed on the decision to date. The advisory function signals a commitment to getting the right oversight and focus on the new way for delivering water before the incoming council stands up formal Water Services oversight sometime at the beginning of the new term as is indicated required by the Water Services Delivery Act.

7.3 REVOCATION OF RESERVE AND GIFTING OF LAND

Author: Rachel McNeill, Property Officer

Authoriser: Joanne O'Neill, Director Strategy, Performance, and Design

Attachments: 1. Section 1 SO 605185 

RECOMMENDATION

That Council:

1. Approve pursuant to section 24(1) of the Reserves Act 1977 that the Local Purpose Reserve classification over the land on the corner of Gordon Street and Wynyard Street, Kurow, Section 1 SO 605185 is revoked and the land to remain vested in Council in a fee simple estate on the basis the site is no longer needed for reserve purposes due to change in community needs.
2. Approve the land being declared as surplus land.
3. Approve the land being gifted to Waitaki Valley Health Trust on the following basis:
 - a) The sale is subject to the reserves revocation process being completed as required under the Reserves Act 1977;
 - b) The agreement requires the removal of improvements from the existing site at 6-10 Wynyard Street, Kurow.
4. Delegate to the Chief Executive the authority to take such action and sign such documents as may be reasonably necessary to implements Council's resolutions above, and matter ancillary to them.

DECISION OBJECTIVE

To seek Council approval to initiate the statutory process for revoking the reserve status of Section 1 SO 605185, Kurow (corner of Gordon and Wynyard Streets, adjacent to Kurow Memorial Hall) from local purpose (community buildings) reserve to fee simple title, and to obtain approval for the subsequent transfer of the property to Waitaki Valley Health Trust to enable development of a community medical centre facility.

SUMMARY

The Waitaki Valley Health Trust has been collaborating with Waitaki District Council to develop a new medical centre in Kurow. The proposed site is Council-owned land at the corner of Gordon and Wynyard Streets (Section 1 SO 605185, 3,859 sqm). To support this project, this land was reclassified from Local Purpose (Passive Recreation) Reserve to Local Purpose (Community Buildings) Reserve following resolution in Council in September 2023 to facilitate the project. Resource consent for the medical centre development was granted in 2024.

The Council proposes to gift the land to the Trust to enable the medical centre's construction.

Council considered a lease agreement as an alternative to gifting the land. However, leasing could limit the Trust's ability to secure funding. Transferring full ownership (fee simple title) gives the Trust the certainty needed to obtain additional funding for the project.

A land investigation has confirmed the subject site's suitability for reserve revocation and that it is not Crown-derived (Council holds it in its own right) land. Council now requires formal approval to

proceed with the statutory reserve revocation process and subsequent land transfer to enable the community medical centre development.

The existing medical centre at 10 Wynyard Street, also on Council land, is no longer suitable for future community use. As part of the agreement, the Trust will remove all buildings and improvements from the current site at 6–10 Wynyard Street before returning it to Council.

DECISION-MAKING EXPECTATIONS

Governance Decision-Making:	Approve proposal to revoke local purpose reserve land (Section 1 SO 605185) and vest in Council as fee simple land to facilitate the development of a medical centre in Kurow; and agree to gift the subject land to the Waitaki Valley Health Trust for the purpose of the development of a new medical centre.
Operational Decision-Making:	Delegate Chief Executive to implement Council's resolution including the associated statutory process requirements and agreement with the Trust.
Communications	Media Releases – contributed to by officers and Elected Members Media/public enquiries regarding governance decision-making topics above can be addressed by governance Media/public enquiries regarding operational decision-making topics above can be addressed by officers

SUMMARY OF DECISION-MAKING CRITERIA

	No/Moderate/Key		No/Moderate/Key
Policy/Plan	Moderate	Environmental Considerations	No
Legal	Moderate	Cultural Considerations	No
Significance	Moderate	Social Considerations	No
Financial Criteria	Moderate	Economic Considerations	No
Community Views	Moderate	Community Board Views	Moderate
Consultation	Moderate	Publicity and Communication	No

BACKGROUND

The site of the proposed new medical centre facility is located on the corner of Gordon and Wynyard Streets, Kurow (Section 1 SO 605185). The land is Council owned and classified as Local Purpose (Community Buildings) Reserve with an area of 3,859 sqm as outlined in attachment 1.

The subject land was previously classified under the Reserves Act 1977 (Reserves Act) as Local Purpose (Passive Recreation) Reserve. In 2023, Council resolved to reclassify the subject land to Local Purpose (Community Buildings) Reserve [Resolution WDC 2023/159]. Council resolved at its 26 September 2023 meeting to make the land available for the Waitaki Valley Health Trusts community Hub development.

Consultation for a resource consent under the Resource Management Act to facilitate the development of a new medical centre on the subject land and reclassification of the reserve land from Local Purpose (Passive Recreation) Reserve to Local Purpose (Community Buildings) Reserve was completed in in 2024. No objections were received. Resource consent was granted to subdivide land into two allotments and to establish a Community Health & Wellness Hub including associated car parking areas and emergency helicopter landing area on Lot 1 and storage for Hazardous Substances as per consent 201/202.2023.2258.

Through consultation on Council's Long-Term Plan 2025 – 2034, feedback was received suggesting a proposal to gift land holdings to Waitaki Valley Health Trust to provide assets/funding for their project.

Process to divest local purpose reserve and gift land

The following process is required to be followed as per the Reserves Act 1977.

- **Determine justification** – Confirm the reserve is no longer required for its original purpose or that divestment serves the public interest.
- **Consult with iwi/mana whenua**
- **Consult with the Commissioner**
- **Public consultation** – Publicly notify the intention to revoke reserve status and allow for public submissions over the prescribed period.
- **Consider submissions** – Review and formally consider all public feedback received during consultation
- **Council resolution** – Pass resolution to revoke reserve status
- **Legal completion** – Complete survey requirements and convert land to fee simple title through LINZ.
- **Execute gift** – Transfer ownership to the community group via council resolution, ensuring compliance with Local Government Act 2002 asset disposal provisions.

To enable the disposal of the subject land to the Waitaki Valley Health Trust, Council must revoke the reserve status of the site in accordance with the Reserves Act. The Trust requires Council approval prior to any future disposal of the gifted land, Council must be satisfied that this revocation can be justified on the basis that the land is no longer required for its original purpose, or due to changing community needs.

As part of the agreement, it is anticipated that the trust's current site at 6-10 Wynyard Street, Kurow would be cleared of all improvements before being returned to Council. Discussions with the Trust have confirmed their willingness to accept the land under these conditions. All costs associated with the revocation of the reserve status and the transfer of land title are expected to be met by the Trust.

SUMMARY OF OPTIONS CONSIDERED

Option 1 – Revocation of Reserve and Gifting of Land to Waitaki Valley Health Trust (preferred option)

Advantages	Disadvantages	Risks
• Supports development of a community health and wellness hub in Kurow	• Council permanently loses ownership of the land	• Public or iwi opposition during consultation phase

<ul style="list-style-type: none"> • Provides the Trust with a greater security of tenure, enabling access to funding and long-term planning • Aligns with community feedback received during the Long-Term Plan process, adding to the Trust's assets 	<ul style="list-style-type: none"> • Potential public concern over gifting rather than leasing or selling • Legal and administrative costs associated with revocation and transfer • Council loose direct control of the site regardless of if leased or disposed of 	<ul style="list-style-type: none"> • Future disposal of the land by the Trust without Council oversight (mitigated by condition requiring Council approval) • Perception of setting a precedent for gifting Council land • Council do not realise the true monetary value of the land
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Option 2 – Status Quo

Retains the reserve status but may hinder development and funding opportunities for the Trust. Council would progress leasing the site to the Trust.

Advantages	Disadvantages	Risks
<ul style="list-style-type: none"> • Council retains ownership of the land 	<ul style="list-style-type: none"> • May limit the Trust's ability to secure funding due to lack of freehold title. • Creates ongoing administrative and legal obligations for Council. • The Trust cannot use the site as leverage for funding. 	<ul style="list-style-type: none"> • The Trust may be unable to proceed with their project if funding is contingent on land ownership • Potential delays or complications negotiating lease terms

ASSESSMENT OF PREFERRED OPTION

Proceeding with the revocation of reserve status and gifting of Section 1 SO 605185 to the Waitaki Valley Health Trust is considered the most effective and efficient option to support the Trust's development. Delaying this decision and opting to lease the site instead would still require legal input and incur similar costs, without providing the Trust with the freehold title necessary to secure funding. By deciding to dispose of the land now, Council can avoid duplicating legal processes and administrative effort, while enabling the Trust to move forward with greater certainty and momentum.

CONCLUSION

The proposed revocation of reserve status and gifting of Section 1 SO 605185 to the Waitaki Valley Health Trust presents a timely opportunity to support the development of a community health and wellness hub in Kurow. While the decision involves the permanent transfer of Council-owned land, the community benefits—particularly in enabling the Trust to secure funding and deliver essential health services—are considered to outweigh potential concerns. The gifting arrangement includes safeguards such as Council oversight of any future disposal and the return of the Trust's current site. Given the low to moderate significance of the proposal under Council's Significance and Engagement Policy 2023, and the alignment with strategic community outcomes, Council is well placed to decide now rather than proceed with a lease arrangement that may hinder the Trust's ability to advance their project.

ADDITIONAL DECISION-MAKING CONSIDERATIONS

Waitaki District Council Strategic Framework

Outcomes

Community Outcomes

Prosperous District

- Fostering a diverse and resilient economy

Strong Communities

- Enabling safe, healthy communities
- Connected, inclusive communities

Quality Services

- Community facilities and services we are proud of

Policy and Plan Considerations

The proposal to gift the land to Waitaki Valley Health Trust is of low to moderate significance under the Waitaki District Council's Significance and Engagement Policy 2023. While the land is not classified as a strategic asset and the gifting does not substantially alter service levels, the transfer supports community health outcomes and involves a change in land ownership. Accordingly, the policy supports a proportionate engagement approach, including iwi consultation and public notification, to ensure transparency and community awareness of the decision.

Community Views

Community view may arise during notification process to revoke reserve status.

Due to time constraints this report is going directly to Council. This report will be circulated to Community Board members prior to the Council meeting.

Financial Considerations

The main financial implication is the disposal of a Council asset from the books.

It is proposed that the Trust will cover the following estimated costs associated with revoking the reserve status and transfer of land:

- Department of Conservation – \$500 - \$1,000
- Property Consultant - \$1,000
- Legal - \$3,000

Legal Considerations

The Council will need to engage with the Reserves Act 1977 process for revoking a reserve.

Publicity and Community Considerations

- Iwi consultation will commence following Council approval.
- Public notification will be undertaken as required under section 24 of the Reserves Act 1977
- Submissions may arise from consultation

Attachment 1: Section 1 SO 605185



Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

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This information is made available in good faith but its accuracy is not guaranteed.
Waitaki District Council accepts no liability for any error.

Printed by: at 5/08/2025 12:02 pm



7.4 PALMERSTON SQUASH RACQUETS CLUB - GIFTING OF BUILDING

Author: Suzanne Clark, Property Officer
Recommender: Claire Foster, Commercial & Property Lead
Authoriser: Joanne O'Neill, Director Strategy, Performance, and Design

PURPOSE

To seek Council's approval to gift the building located at 33 Gilligan Street, Palmerston, to the Palmerston Squash Racquets Club (the Club), a not-for-profit community organisation, to support local sports.

EXECUTIVE SUMMARY

The Palmerston Squash Racquets Club operates from a Council-owned building at 33 Gilligan Street, constructed in the mid-1980s on reserve land before Council assumed ownership following the Club's loan default in 1989. The current lease has expired with revenue insufficient to cover costs, while approximately \$20,000 in maintenance is required for water ingress issues with no Council budget available. Council currently subsidises the Club through below-market rent and building maintenance contributions, creating an ongoing ratepayer burden.

The Club have indicated that their preferred option is to transfer building ownership to the Club by way of a gift, under a peppercorn ground lease, with the Club assuming full responsibility for all maintenance, rates, insurance and outgoings. This approach eliminates the ratepayer subsidy, avoids the need for Council loan funding, enhances the Club's grant funding opportunities, and has the support of the Waihemo Community Board (Resolution WCB2025/010). While the transfer results in an accounting loss on the \$241,000 book value, there is no cash impact to Council. Risk mitigation includes ground lease clauses requiring that the building is to be removed or revert to Council ownership if the club ceases operations or is wound up.

OFFICER RECOMMENDATION

That Council:

- 1. Approves the transfer by way of gift to the Palmerston Squash Racquets Club, the Palmerston squash courts building located at 33 Gilligan Street, Palmerston on Section 82 Block XXXIII Town of Palmerston.
- 2. Delegates authority to the Chief Executive to conclude the transfer of the building.

DECISION-MAKING EXPECTATIONS

Governance Decision-Making:	Approve proposal to transfer by way of gift to the Palmerston Squash Racquets Club, the Palmerston squash courts building located at 33 Gilligan Street on Section 82 Block XXXIII Town of Palmerston.
Operational Decision-Making:	Delegate Chief Executive to implement Council's resolution including the transfer of the building and ground lease with the squash club.

Communications

Media Releases – contributed to by officers and Elected Members

Media/public enquiries regarding governance decision-making topics above can be addressed by governance

Media/public enquiries regarding operational decision-making topics above can be addressed by officers

SUMMARY OF DECISION-MAKING CRITERIA

	No/Moderate/Key		No/Moderate/Key
Policy/Plan	Moderate	Environmental Considerations	No
Legal	Moderate	Cultural Considerations	No
Significance	No	Social Considerations	No
Financial Criteria	No	Economic Considerations	No
Community Views	No	Community Board Views	No
Consultation	No	Publicity and Communication	No

CONTEXT, ANALYSIS AND ADVICE

Background

The Palmerston squash courts building is located at 33 Gilligan Street, Palmerston – see Image A. Although the squash building has technically been owned by Council since amalgamation with Waihemo County Council (WCC), it was only added to the Council’s asset register in 2022.

Image A



The Club is a rural affiliate of Squash NZ, currently operating with 29 members. While membership numbers are lower than the average for rural squash clubs in New Zealand, the Club remains active and financially stable. Historically, the Club has sought support from Council during periods of declining membership.

The Club constructed their facility on Council reserve land in the mid-1980s using community fundraising (\$150,000) and a loan (\$50,000). When the Club defaulted on loan payments in 1989, WCC assumed ownership and loan obligations, leasing the building back to the Club for 33-years at market rent.

Under the 1989 lease, the Club was responsible for all interior and exterior maintenance and paid market rent. In 2022, a new lease shifted some maintenance responsibilities to the Council. These now align more closely with a standard commercial tenancy, though the Club pays below-market rent and no outgoings, resulting in a ratepayer subsidy for building maintenance and a top-up for rates and insurance costs. The Club has maintained the building's interior and funded improvements.

Despite a 1999 community board recommendation to transfer ownership back to the Club, financial constraints of the Club prevented completion. The Club experienced intermittent financial difficulties from this time resulting in rent reductions and rates arrears. In 2022, Council resolved to remit penalties (\$2,634.99), require payment of rates arrears (\$7,529), provide building upgrade funding (\$3,700), and set rent at \$60 per member annually.

The lease expired with revenue insufficient to cover costs. Negotiations for renewal stalled over rent levels, and approximately \$20,000 in building maintenance was identified with no council budget available.

On 7 July 2025, the Waihemo Community Board resolved (WCB2025/010) to support transferring building ownership to the club for a nominal fee, with the club assuming responsibility for rates, insurance and maintenance under a ground lease arrangement.

Current maintenance requirements are limited to the changing rooms, where water ingress is affecting windows, reveals and the subfloor area immediately under the showers. The cost to fully repair the damage is approximately \$20,000.

Financial Considerations

The original loan balance at 1989 amalgamation is untraceable, however records show an outstanding balance of \$40,000 in June 1994. This loan was fully repaid by June 2004 through rates levied on Waihemo properties.

The building was added to Council's asset register in 2022 at \$241,000 book value, with component useful lives ranging 9-35 years. Asset disposal would generate an accounting loss but no cash impact to Council.

Summary of Options Considered

Option 1 –Transfer by way of gift to the Palmerston Squash Racquets Club, the Palmerston squash courts building located at 33 Gilligan Street, Palmerston on section 82 Block XXXIII Town of Palmerston and grant a peppercorn ground lease.

The proposal encompasses the existing building only, transferred on an as-is basis. The Club would assume responsibility for all maintenance costs and outgoings under a peppercorn rental arrangement, subject to any future community rent policy.

Advantages	Disadvantages	Risks
<ul style="list-style-type: none">• The Club assume full responsibility and cost liability for all building	<ul style="list-style-type: none">• If the Club is wound-up, despite protections in the ground lease,	<ul style="list-style-type: none">• Given the limited population base from which to draw membership, there

<p>maintenance, rates and other outgoings.</p> <ul style="list-style-type: none"> • Loan funding for repairs is not required - no ratepayer subsidy. • Supports and aligns with Council's Recreation Strategy. • Will increase the likelihood of the Club receiving grant funding for building improvement projects. • Ground lease conditions can include clauses for improvements removal or ownership reverting to the Council if the Club were wound-up. • No ratepayer subsidy in the short to medium term as the Club will become responsible for all maintenance, rates and insurance. • Waihemo Community Board supports this option. 	<p>Council may inherent a building that is further deteriorated.</p> <p>2.</p>	<p>remains a risk that Council financial assistance may be sought in the longer term or that the Club is wound-up and that Council inherits a building that is further deteriorated.</p> <p>3.</p>
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Option 2 – Status quo

Advantages	Disadvantages	Risks
<ul style="list-style-type: none"> • Building will be maintained to standard, maximising useful life. • Will enable Club membership fees to be kept affordable for the community. 	<ul style="list-style-type: none"> • Immediate and ongoing ratepayer subsidy would be required. • Does not align with Council's Recreation Strategy. 	<ul style="list-style-type: none"> • Perceived inequity from other clubs. • May set a precedent of assistance for other clubs.

Option 3 – Consult in the Annual Plan to introduce a Palmerston Hall rate to fund squash building maintenance, with the building administered by a hall committee.

Advantages	Disadvantages	Risks
<ul style="list-style-type: none"> • Additional maintenance funding will be sourced from the community where the benefit is delivered. 	<ul style="list-style-type: none"> • No guarantee that the community will engage with any proposal or accept a targeted rate. • Introduces a third party to any agreement. • Does not align with Council's Recreation Strategy 	<ul style="list-style-type: none"> • Perceived inequity from other clubs. • May set a precedent of assistance for other clubs. • May not derive enough revenue to cover all maintenance requirements. <p>4.</p>

Assessment of Preferred Option

The preferred option is to gift the building to the Club and grant a peppercorn ground lease that requires the Club to pay all rates demanded. This option is the preferred approach as it delivers optimal outcomes for both Council and the community. The Club are supportive of this approach and are resistant to any option requiring a rent amount that covers all outgoings as well as a contribution towards building maintenance. Other Council teams, as operational landowner and asset owner support the transfer proposal as do the Waihemo Community Board.

Conclusion

Gifting the Palmerston Squash Racquets Club building and establishing a peppercorn ground lease represents the most strategic and financially responsible approach for Council. This solution eliminates the immediate \$20,000 repair liability and ongoing ratepayer subsidies while transferring full operational responsibility to the Club.

The arrangement aligns with Council's Recreation Strategy by enabling club self-sufficiency and investment in their facility, while providing Council with appropriate safeguards through ground lease provisions. By removing barriers to grant funding access and ensuring cost recovery objectives are met, this option delivers sustainable community recreation infrastructure without ongoing financial burden to ratepayers.

The transfer effectively resolves the longstanding lease impasse while maintaining community access to squash facilities through a financially viable club structure, making it the optimal solution for all stakeholders.

Next Steps

The Commercial and Property Team will negotiate a new ground lease with the Club and arrange transfer of the building to the Club upon signing of the agreement.

ADDITIONAL DECISION-MAKING CONSIDERATIONS

Waitaki District Council Strategic Framework

Outcomes

Community Outcomes

Prosperous District

- Fostering a diverse and resilient economy

Strong Communities

- Enabling safe, healthy communities
- Connected, inclusive communities

Quality Services

- Community facilities and services we are proud of

Policy and Plan Considerations

The recommendation aligns with Council's Recreation Strategy by creating an opportunity for the Club to create a 'strong recreation club environment'. The Club will be motivated to invest in their future and invest in a building they own. Enabling Club success contributes to a higher level of physical activity in the district. The Strategy has a target of 100% of costs associated with clubroom use being recovered. Council typically provides facilities able to be used by multiple users such as general playing fields and the Events Centre currently under construction. There is no known precedent for Council to retain and maintain a single code purpose-built building at the ratepayer's cost and to subsidise the cost of rates and insurance.

Legal Considerations

The preferred option complies with Council's legal obligations for disposing of assets under the Local Government Act 2002 section 12 and section 14.




The Reserves Act governs the process to be followed when considering granting a lease of any reserve land.

7.5 RATIFICATION OF SUBMISSIONS ON CHANGING RESOURCE MANAGEMENT NATIONAL DIRECTIONS

Author: David Campbell, Heritage & Planning Manager

Authoriser: Roger Cook, Director Natural and Built Environment

Attachments:

1. WDC submission RM national directions packages 1 and 2 [↓](#) 
2. WDC submission RM national direction package 3 [↓](#) 
3. WDC submission RM national direction package 4 [↓](#) 

RECOMMENDATION

That Council:

1. Formally ratifies Waitaki District Council's submissions on updating RMA national direction, as submitted to the Ministry for the Environment on 25 July 2025.

DECISION OBJECTIVE

To retrospectively ratify Waitaki District Council's (WDC's) submissions on Resource Management Act (RMA) national direction packages, being Infrastructure and Development, Primary Sector, Freshwater and Going for Housing Growth, as submitted to the Ministry for the Environment on 25 July 2025.

SUMMARY

Government is implementing the most significant resource management reforms in decades, with the changes affecting how we manage land use, infrastructure, and environmental protection. These changes will affect how Council processes applications, what activities need consents and permits, and how we balance environmental protection with economic development. The proposed national direction changes represent a shift from the current environment-first hierarchy to a balanced framework giving equal weight to economic, social, and environmental factors.

Critically, these reforms centralise decision-making power, moving away from local discretion toward standardised national approaches that risk undermining community voice in shaping their own development futures. This centralisation threatens to erode local democracy by reducing opportunities for meaningful community input on development priorities and environmental protections that reflect distinct local values and character. The impact is amplified by concurrent legislative changes including the Local Government Systems Improvements Bill and the Building and Construction (Small Stand-Alone Dwellings) Amendment Bill—on which Council also recently submitted concerns. Together, these reforms signal a systematic reduction in local government autonomy and community participation in critical planning decisions that will shape our district's future.

Council's submission raises concerns around the current resource management reform programme, which represent a piecemeal response to coalition government priorities rather than systematic reform. The submission outlines that proposed changes to national directions also create cumulative environmental trade-offs by weakening landscape, biodiversity and heritage protections through more enabling consent pathways across national directions, along with multiple objectives required

to be given equal weighting. Concerns have also been raised that system fragmentation persists with unresolved conflicts between national instruments, whilst planning gaps fail to address cumulative development impacts and overlook critical rural infrastructure constraints.

Council's submission supports enabling appropriate growth and infrastructure but requires a balanced approach that maintains local flexibility within national frameworks. The submission highlights that too often, rural and provincial areas are sacrificed for large scale projects that deliver few local benefits, but the ongoing legacy of their often-irreversible effects on the environment. Many of the proposed changes to national direction will further exacerbate this issue.

The submission also asks that resource management reforms must include meaningful community consultation, maintain democratic input in planning decisions, and provide substantial capacity building support to enable successful implementation without compromising local character and identity.

DECISION-MAKING EXPECTATIONS

Governance Decision-Making:	To approve the submission (retrospectively)
Operational Decision-Making:	The submission has been lodged.
Communications	Media Releases – contributed to by officers and Elected Members if required Media/public enquiries regarding governance decision-making topics above can be addressed by governance Media/public enquiries regarding operational decision-making topics above can be addressed by officers

SUMMARY OF DECISION-MAKING CRITERIA

	No/Moderate/Key		No/Moderate/Key
Policy/Plan	Key	Environmental Considerations	Moderate
Legal	No	Cultural Considerations	Moderate
Significance	No	Social Considerations	No
Financial Criteria	No	Economic Considerations	Moderate
Community Views	No	Community Board Views	No
Consultation	No	Publicity and Communication	No

BACKGROUND

National direction supports local decision-making under the RMA, and includes national policy statements, national environmental standards, national planning standards and regulations. It can direct plan changes, provide guidance for resource consent decisions and introduce nationally consistent rules and environmental standards.

Targeted amendments to existing national instruments have been proposed, plus four new national direction instruments. These are summarised below:

Proposals for new national direction	
Package 1: Infrastructure and development	<ul style="list-style-type: none"> • National Policy Statement for Infrastructure • National Environmental Standards for Granny Flats (Minor Residential Units) • National Environmental Standards for Papakāinga • National Policy Statement for Natural Hazards
Proposals to review or change existing national direction	
Package 1: Infrastructure and development	<ul style="list-style-type: none"> • National Policy Statement for Renewable Electricity Generation 2011 • National Policy Statement on Electricity Transmission 2008 (to be renamed National Policy Statement for Electricity Networks) • Resource Management (National Environment Standards for Electricity Transmission Activities) Regulations 2009 (to be renamed) National Environment Standards for Electricity Network Activities • Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016
Package 2: Primary sector	<ul style="list-style-type: none"> • Resource Management (National Environmental Standards for Marine Aquaculture) Regulations 2020 • Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 • New Zealand Coastal Policy Statement 2010 • National Policy Statement for Highly Productive Land 2022 • Resource Management (Stock Exclusion) Regulations 2020 (Stock Exclusion Regulations) <p>Multiple instruments for quarrying and mining provisions</p> <ul style="list-style-type: none"> • National Policy Statement for Indigenous Biodiversity 2023 • National Policy Statement for Freshwater Management 2020 • Resource Management (National Environmental Standards for Freshwater) Regulations 2020 • National Policy Statement for Highly Productive Land 2022
Package 3: Freshwater	<ul style="list-style-type: none"> • National Policy Statement for Freshwater Management 2020 • Resource Management (National Environmental Standards for Freshwater) Regulations 2020

Package 4 proposes to address Going for Housing Growth and does not make any changes to existing national direction under the RMA. Instead, feedback on the discussion document will be used to inform officials' thinking on policy development for Phase 3 of resource management reform.

It is structured around three pillars that make system changes to address the underlying causes of the housing supply shortage.

These are:

- Pillar 1: Freeing up land for urban development, including removing unnecessary planning barriers
- Pillar 2: Improving infrastructure funding and financing to support urban growth
- Pillar 3: Providing incentives for communities and councils to support growth.

Key policy shifts include:

1. Environmental Primacy → Balanced Objectives

Moving from hierarchical decision-making (environment first, people/economy second) to multiple objectives with equal weight. Infrastructure benefits and economic development now balanced against environmental effects.

2. Prescriptive Rules → Risk-Based Management

Replacing blanket restrictions with site-specific risk assessments. Natural hazards, forestry slash management, and freshwater all move to risk-proportionate approaches.

3. Local Discretion → National Consistency

Standardising rules across councils to reduce uncertainty and compliance costs. Consistent terminology, consent pathways, and national standards for key activities.

4. Consent-Heavy → Permitted Activities

Streamlining development by making more activities permitted without consent: granny flats, water storage, infrastructure maintenance, telecommunications upgrades.

5. Regulatory Barriers → Development Enablement

Proactively supporting critical infrastructure, housing, and economic development. Enhanced policy support for renewable energy, Māori development, and priority activities.

6. Rigid Standards → Flexible Local Application

Allowing councils to deviate from national standards where justified by local conditions, while maintaining core environmental protections.

Council's submission is included as Attachments 1-4.

Council was party to Taituarā's submission on this matter and generally endorsed Taituarā's submission.

SUMMARY OF OPTIONS CONSIDERED

Option 1 – Formally ratify Council's submissions on changing resource management national directions as submitted to Ministry for the Environment on 25 July 2025 (Recommended)

Option 2 – Do not formally ratify Council's submissions on changing resource management national directions as submitted to Ministry for the Environment on 25 July 2025.

ASSESSMENT OF PREFERRED OPTION

Draft submissions were pre-circulated to the Governance Team on 11 July 2025 and discussed at the Councillor briefing on 8 July 2025.

The submissions were sent to Ministry for the Environment on 25 July 2025 to meet the limited consultation timeframes. Therefore Option 1 is the only viable option.

CONCLUSION

By lodging a submission on the national direction packages will help inform government of the aspects Council supports, opposes or is neutral to but seeks changes be made.

ADDITIONAL DECISION-MAKING CONSIDERATIONS

Waitaki District Council Strategic Framework

Outcomes

Community Outcomes

Prosperous District

- Attractive to new opportunities
- Supporting local businesses
- Fostering a diverse and resilient economy

Strong Communities

- Enabling safe, healthy communities
- Connected, inclusive communities
- Promoting a greater voice for Waitaki
- Celebrating our community identity

Quality Services

- Robust core infrastructure and services
- Community facilities and services we are proud of

Valued Environment

- Protecting our diverse landscapes and water bodies
- Meeting environmental and climate change challenges

Policy and Plan Considerations

The national direction packages will have a flow on effect to the District Plan, once the national direction instruments are enacted.

Community Views

N/A – the community could have submitted on the national direction packages.

Financial Considerations

Nil – the submission was prepared in house.

Legal Considerations

None

Environmental Considerations

The national direction packages address some environmental matters.

Publicity and Community Considerations

Nil

25 July 2025



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To the National Directions team

Waitaki District Council submission in the matter of resource management infrastructure, development and primary sector national direction – packages 1 and 2

Waitaki District Council (WDC) welcomes the opportunity to submit on Package 1 and 2 consultation of national resource management direction.

Background

The Waitaki district has a population of ~24,300 (2024) and covers a large land area (7,152 km²) reaching inland from the Waitaki River mouth, up the Waitaki River Valley, through Ōhau to the top of the Ahuriri River Valley, extending south to Ōamaru, and down the east coast beyond Palmerston to Flag Swamp. The Waitaki district is the only Council in the South Island working with two regional Councils - Environment Canterbury and Otago Regional Council.

Summary

Waitaki District Council (WDC) raises concerns around the current resource management reform programme, which represent a piecemeal response to coalition government priorities rather than systematic reform.

Government is implementing the most significant resource management reforms in decades, representing a shift from local decision-making to centralised, standardised approaches. The signalled changes systematically erode local democracy through centralised decision-making. This undermines community input on development priorities and environmental protections that reflect local values. This is compounded by other legislative changes anticipated such as the Local Government Systems Improvements Bill and the recent Building and Construction (Small Stand-Alone Dwellings) Amendment Bill.

The proposed changes to national directions also create cumulative environmental trade-offs by weakening landscape, biodiversity and heritage protections through more enabling consent pathways across national directions, along with multiple objectives required to be given equal weighting. This is compounding impacts from recent

legislation like the Fast Track Approvals Act, and proposed changes to Climate Change Response (ETS – Forestry Conversion), the Wildlife Act and other conservation matters.

System fragmentation persists with unresolved conflicts between national instruments, whilst planning gaps fail to address cumulative development impacts and overlook critical rural infrastructure constraints.

WDC supports enabling appropriate growth and infrastructure but requires a balanced approach that maintains local flexibility within national frameworks. Too often, rural and provincial areas are sacrificed for large scale projects that deliver few local benefits, but the ongoing legacy of their often-irreversible effects on the environment. Many of the proposed changes to national direction will further exacerbate this issue.

The resource management reforms must include meaningful community consultation, maintain democratic input in planning decisions, and provide substantial capacity building support to enable successful implementation without compromising local character and identity.

Key WDC submission themes

Strategic focus

- Many of the proposed amendments tilt policy frameworks strongly in favour of enabling development proposals without providing guidance for resolving conflicts, with weaker provisions relating to adverse environmental, social, cultural and economic effects
- Ensure national direction allows protection of important local landscape, biodiversity and heritage values
- Balance national consistency with local flexibility to achieve sustainable outcomes

Implementation timeframes

- Reject vague "as soon as practicable" deadlines - inadequate for resource-constrained smaller councils such as Waitaki
- Provide specific timeframes with built-in flexibility for genuine resource/technical constraints
- Align implementation with local government Long Term Plan cycles for effective integration

Transition protection

- Mandate clear transition arrangements
- Protect existing consents during policy changes
- Coordinate multiple NPS changes to avoid implementation conflicts

Implementation support

- Provide detailed implementation guidance and standardised assessment tools
- Ensure inter-council coordination between district and regional authorities

Funding solutions

- Establish funding mechanisms: rates relief or central government grants
- Cover full implementation costs, not just policy development

Key WDC submission points

1. Infrastructure & Development Package

National Policy Statement for Infrastructure (NPS-I)

- Strengthen rural context recognition for dispersed communities and limited economies of scale
- Expand infrastructure definition to include irrigation systems
- Protect local strategic planning from national direction override where local plans have been developed with the community and adopted by Council
- Strengthen landscape provisions for infrastructure visibility in open rural areas

National Policy Statement for Renewable Electricity Generation (NPS-REG)

- Support objectives with implementation guidance protecting local interests
- Prevent "resilience" provisions overriding landscape/heritage/environmental protections
- Address cumulative effects when multiple projects use the same resource areas
- Recognise rural location constraints and transport/access limitations
- Clarify "routine" maintenance versus major upgrades definitions
- Resolve policy conflicts between mitigation and offsetting requirements

National Policy Statement for Electricity Transmission (NPS-EN)

- Support distribution network inclusion with appropriate scaling for council capacity
- Address small rural council resource constraints and lack of technical expertise in some disciplines
- Mandate early community engagement during route selection
- Include environmental, cultural, social and climate risk factors in selection criteria
- Differentiate protection needs between high-voltage and low-voltage networks
- Better integration with primary production activities

National Environmental Standards for Electricity Transmission Activities (NES-ENA)

- Recommend controlled activity status (some degree of control) for non-compliance and sensitive environment works
- Support management plans with standardised templates
- Clarify "routine" work definitions with stronger environmental standards for sensitive areas

- Require consultation for subdivisions and large developments near infrastructure

National Environmental Standards for Telecommunication Facilities (NES-TF)

- Require technical justification for exceeding limits and neighbour consultation
- Mandate cumulative impact assessment
- Enable road reserve use with consultation requirements or where shared corridor agreements are in place
- Support co-location over multiple smaller installations

NEW National Environmental Standards for Granny Flats (NES-GF)

OPPOSE - Undermines local context-specific solutions and creates planning/Building Act conflicts

- Address 80m² units not contributing to infrastructure costs creating ratepayer burden
- Include monitoring mechanisms to prevent commercial use
- Add development/financial contributions to prohibited regulation list
- Address implementation costs without cost recovery for councils

NEW National Environmental Standards for Papakāinga (NES-P)

- Support enabling Māori housing with cultural activities
- Clarify interaction with existing zone frameworks, particularly rural zones
- Require natural hazards compliance and provide transition provisions
- Enable supporting activities: primary production, cultural tourism, renewable energy
- Apply selective zone rules: natural hazards, infrastructure, heritage, landscape protections
- Support restricted discretion for Treaty land with expanded assessment matters
- Implement safeguards for general land use to prevent commercial misuse

NEW National Policy Statement for Natural Hazards (NPS-NH)

- Recognise rural areas face different hazards and response capabilities
- Support local flexibility for additional hazards appropriate to circumstances
- Address infrastructure exclusion creating resilience gaps
- Require: "best available information" with guidance on handling uncertainty
- Coordinate with the NZCPS to avoid duplication
- Provide technical capacity building and resource funding for rural councils
- Support minimum 5-year staged implementation with capacity-based flexibility

2. Primary Sector Package

Commercial Forestry (NES-CF)

- Oppose removal of local council control over afforestation - local control is necessary to manage local issues like fire risk near townships
- Support retaining ability to set fire risk setbacks beyond 30m near existing townships where standard NES-CF setbacks may be inadequate
- Oppose removal of afforestation and replanting plan requirements - these provide certainty for future land use, rating purposes, and roading infrastructure planning

New Zealand Coastal Policy Statement

- Cautiously support proposed changes to enable priority activities like renewable energy relevant to Waitaki
- Require protection of cultural values
- Need clear guidance on cumulative effects of multiple priority activities and transition arrangements for applications in progress
- Request enhanced consultation requirements for culturally significant areas and implementation monitoring

Highly productive and (NPS-HPL)

- Support exempting LUC 3 (highly productive soils) land for urban development only (not rural lifestyle development) to focus growth into serviced areas and reduce sprawl
- Prefer council-led rezoning of LUC 3 land over private plan changes to ensure strategic alignment with spatial and district plans
- Support additional Special Agricultural Area criteria for mapping HPL if LUC 3 is removed, including actual land use, infrastructure access, and local food security
- Support mixed national-local approach for identifying Special Agricultural Areas - central government criteria with local implementation
- Request extended timeframes for HPL mapping with interim provisions and clearer guidelines
- Request the consideration of SAA's in the Waitaki district

Quarrying and mining provisions

- Concerned about cumulative impact of consent pathways across NPS-IB, NPS-FM, NPS-HPL creating "dramatic shift" in environmental management
- Oppose adding "operational need" as gateway test - will result in less environmental protection and degradation for future generations

Stock exclusion regulations

- Acknowledge cost-benefit concerns for extensive farming systems but note this varies by region depending on environmental conditions

Detailed responses to the consultation questions

Please refer to Attachment 1 for our detailed responses to the consultation questions,

Conclusion

Thank you for the opportunity to submit on the infrastructure, development and primary sector national direction - package 1 & 2 consultation.

Yours sincerely



Mayor Gary Kircher
Mayor for Waitaki

Person for Contact: Victoria van der Spek, Policy Lead, Waitaki District Council

Attachment 1: Response to detailed consultation questions – packages 1 and 2

Package 1: Infrastructure and Development

Proposed ND	Consultation question	WDC Feedback	Relief sought
National Policy Statement for Infrastructure			
	1. Is the scope of the proposed NPS-I adequate?	Waitaki District is largely rural with smaller settlements, meaning infrastructure often serves dispersed communities.	Acknowledge through the NPS-I the challenges of providing infrastructure across large rural areas where economies of scale are limited.
	2. Do you agree with the definition of 'infrastructure', 'infrastructure activities' and 'infrastructure supporting activities' in the NPS-I?	<p>Ensure the definition of "infrastructure" adequately captures rural-specific needs like irrigation systems, and rural broadband infrastructure.</p> <p>Support the inclusion of green infrastructure in NPS-I definitions.</p> <p>Why is quarrying specifically mentioned as an infrastructure supporting activity?</p>	<p>Clarify vague definitions that could capture many commercial/industrial activities.</p> <p>Add coastal protection works to the definition to support adaptation measures used to address a changing climate.</p> <p>Remove quarrying as an infrastructure supporting activity.</p>
	3. Does the proposed objective reflect the outcomes sought for infrastructure?	Focused more for urban centres, and not so fit for purpose for rural areas with more diverse settlement patterns.	Strengthen reference to infrastructure serving diverse community needs across different settlement patterns.

Proposed ND	Consultation question	WDC Feedback	Relief sought
	4. Does the proposed policy adequately reflect the benefits that infrastructure provides?	<p>Need to better acknowledge:</p> <p>Economic benefits to rural communities from reliable infrastructure</p> <p>The role of infrastructure in supporting primary industry (including processing and support activities) and tourism (key to Waitaki's economy)</p>	
	5. Does the proposed policy sufficiently provide for the operational and functional needs for infrastructure to be located in particular environments?	<p>Yes – however we are concerned around the pathway for infrastructure when there is an operational need.</p> <p>Note rural infrastructure location choices are often more constrained than urban alternatives.</p>	
	6. Do you support the proposed requirement for decision-makers to have regard to spatial plans and strategic plans for infrastructure?	The spatial planning requirement will improve coordination between Council's infrastructure planning and District plan provisions.	Ensure national direction does not override well-considered local strategic planning.
	7. Would the proposed policy help improve the efficient and timely delivery of infrastructure?	Potentially yes if some consenting pathways are made more efficient or eliminated, but this will come at a cost. We are concerned that how we resolve such tensions between infrastructure	Provide framework to resolve tension between development and other values.

Proposed ND	Consultation question	WDC Feedback	Relief sought
		development and the environment has yet to be made clear.	
	8. Does the proposed policy adequately provide for the consideration of Māori interests in infrastructure?	No comment	
	9. Do the proposed policies sufficiently provide nationally consistent direction on assessing and managing the adverse effects of infrastructure?	No – we have concern around the potential for Infrastructure to be able to be built where social and environmental cost is too high. We have concerns where large-scale infrastructure may be developed in more visible open landscapes without adequate protections in place.	Clearer guidance on when environmental adverse effects are unacceptable (bottom line) specifically for open landscapes.
	10. Do the proposed policies sufficiently provide for the interface between infrastructure and other activities including sensitive activities?	In general, policies to address reverse sensitivity are supported. Note smaller communities may have limited options for separating incompatible activities.	

Proposed ND	Consultation question	WDC Feedback	Relief sought
National Policy Statement for Renewable Electricity Generation			
	11. Do you support the proposed amendments to the objective of the NPS-REG?	<p>Overall support for amendment noting areas of caution:</p> <ul style="list-style-type: none"> • Need to ensure local environmental values are not compromised in pursuit of national targets • Important that "resilience" provisions do not override local landscape and heritage protections • Renewable energy should be enabled outside areas identified for significant values under s6 of the RMA and areas of high natural character 	Provide clear implementation guidance to protect legitimate local interests
	12. Are the additional benefits of renewable electricity generation helpful considerations for decision-makers? Why or why not?	<p>Yes</p> <ul style="list-style-type: none"> • Creates consistency across different council areas • Helps to justify decisions that may have local impacts but national benefits 	Consider cumulative benefits of multiple renewable projects in a region
	13. Does the proposed policy sufficiently provide for the operational and functional	Support the policy with some areas identified for improvement	Better recognition of cumulative effects when multiple renewable

Proposed ND	Consultation question	WDC Feedback	Relief sought
	need of renewable electricity generation to be located in particular environments?	<ul style="list-style-type: none"> Note transport and access constraints in rural areas affect operational needs Recognise that rural renewable sites often have limited alternative locations 	<p>projects seek to utilise the same resource areas.</p> <p>Better integration with existing land uses.</p>
	14. Do the proposed new and amended policies adequately provide for existing renewable electricity generation to continue to operate?	<p>Support for existing asset protection policies with minor refinements</p> <p>Minor upgrade definition too broad, may capture very few "major upgrades"</p> <ul style="list-style-type: none"> Balance between protecting renewable assets and maintaining rural character Ensure protection measures do not prevent legitimate rural development 	<p>Clear guidance on what constitutes "routine" maintenance vs major upgrades</p> <p>Reduce scope of minor upgrade definition</p>
	15. Do the proposed policy changes sufficiently provide for Māori interests in renewable electricity generation?	Appropriate framework with implementation support needed	Clear timeframes and processes for engagement requirements
	16. Do you support the proposed policy to enable	Support the enabling approach and discouraging development in areas	Include specific direction that the NPS policies are relevant

Proposed ND	Consultation question	WDC Feedback	Relief sought
	renewable electricity generation development in areas not protected by section 6 of the RMA, or covered by other national direction?	<p>protected by section 6 but with stronger provisions for rural landscape values and cumulative effects assessment.</p> <p>Many rural areas (including Waitaki) have important landscape and amenity values not captured by section 6 RMA</p> <ul style="list-style-type: none"> • Risk of cumulative effects on rural amenity landscapes • Need to consider effects on productive farming land • Note the proposed approach will not assist with a non-complying activity passing through the section 104D gateway test until plans are changed to give effect to the new national direction <p>The amended Policy C1 takes away the requirement to consider mitigation opportunities (C1 d)) and adaptive management measures (C1 e)) contained in the current policy. It appears to only be focussed on operational requirements as opposed to any other considerations. This is addressed by the new policy P2, but with a narrower scope as noted below.</p>	<p>considerations for determining whether the adverse effects of non-complying activities will be minor or more than minor under section 104D(1)(a).</p> <p>Establish that compliance with NPS objectives and policies may constitute special circumstances under section 104D(1)(b)</p> <p>Include guidance in the NPS on how decision-makers should approach the section 104D test during the transition period before plan changes are made.</p> <p>Include stronger consideration of section 7 RMA matters (amenity, landscape)</p> <p>Alignment and strengthening of proposed policy P2 to offset / compensate</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
		The proposed policy P2 appears to reduce the burden on applicants, however, also appears to contradict Policy C2 that seeks offsetting or compensation measures irrespective of s6 matters. Some policy alignment and strengthening is needed.	

Proposed ND	Consultation question	WDC Feedback	Relief sought
National Policy Statement on Electricity Transmission			
		<p>General comments:</p> <ul style="list-style-type: none"> Support expansion to distribution networks but with appropriate scaling <p>Support policies that address reverse sensitivity and direct effects</p>	<p>Provide practical implementation with clear guidance and thresholds.</p> <p>Ensure adequate resources for implementation</p> <p>Recognise rural context and unique needs from urban areas</p> <p>Protect legitimate local interests while enabling national infrastructure</p>
	17. Do you support the inclusion of electricity distribution within the scope of the NPS-EN?	<p>Support inclusion but with appropriate scaling based on asset significance and council capacity.</p> <p>Concerns:</p> <ul style="list-style-type: none"> Risk of over-regulation of smaller distribution infrastructure 	
	18. Are there risks that have not been identified?	<p>Resource/ capacity risks:</p> <ul style="list-style-type: none"> Small rural councils lack technical expertise to assess electricity network requirements 	

Proposed ND	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none"> Significant cost burden on councils for plan changes and ongoing administration without any additional funding Limited staff resources to manage expanded scope and new processes <p>Implementation risks:</p> <ul style="list-style-type: none"> Unclear how policies interact with existing designations and consent conditions Potential conflicts between electricity network protection and natural hazard management 	
	19. Do you support the proposed definitions in the NPS-EN?	<p>Support with modifications</p> <p>"Routine activities" definition too broad - could capture significant works that should require consent.</p> <p>"Upgrading" definition unclear.</p> <p>"Routine activities" definition too broad.</p>	<p>"Sensitive activities" definition should include rural residential (current focus on urban activities)</p> <p>Clearer thresholds for what constitutes minor vs major upgrades</p> <p>Routine activity definition to capture significant works that should requiring consent</p> <p>More clarity for "upgrading" definition</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
	20. Are there any changes you recommend to the NPS-EN?	<ul style="list-style-type: none"> Recognise different infrastructure solutions may be needed in low-density areas Address interaction with primary production activities 	<p>Include specific acknowledgement of rural and remote area challenges</p> <p>Better integrate with natural hazard management requirements</p> <p>Clarify how resilience requirements interact with environmental protection</p> <p>Differentiate between high-voltage distribution requiring strong protection and low-voltage local networks</p>
	21. Do you support the proposed objective? Why or why not?	<p>Support objective but ensure implementation guidance protects legitimate local interests and values.</p> <p>Support because:</p> <ul style="list-style-type: none"> Recognises national significance of electricity networks Balances development needs with environmental protection Aligns with climate change objectives <p>Concerns:</p> <ul style="list-style-type: none"> Insufficient weight given to cumulative effects 	<p>Give greater weighting to address cumulative effects</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
	22. Will the proposed policy improve the consideration of the benefits of electricity networks in decision-making?	<p>Support but with clear guidance on proportionate application and protection of legitimate local interests</p> <ul style="list-style-type: none"> • Risk of benefits being overstated or applied inappropriately to minor projects • Concern that local environmental and community values may be undervalued 	Clear guidance on how to weigh national benefits against local impacts
	23. Does the proposed policy sufficiently provide for the operational and functional needs for electricity networks to be located in particular environments?	Yes, with some refinements.	<p>Clear guidance on what constitutes "unavoidable" adverse effects</p> <p>More explicit provision for emergency repairs and maintenance</p>
	24. Do you support Transpower and electricity distribution businesses selecting the	<p>Support with additional considerations</p> <p>Avoids councils making decisions beyond their expertise</p>	Mandatory early engagement with affected communities during route selection, not just technical considerations.

Proposed ND	Consultation question	WDC Feedback	Relief sought
	preferred route or sites for development of electricity networks?		<p>Clear criteria for route/site selection including environmental, cultural and social factors</p> <p>Independent review mechanisms for major projects</p> <p>Stronger requirements for consideration of alternatives</p>
	25. Are there any other route or site selection considerations that have not been identified?	<ul style="list-style-type: none"> • Consideration of community cohesion and social impacts • Integration with existing rural infrastructure • Future sea level rise and coastal erosion • Increased flood risk from climate change • Seismic risks and geological instability • Wildfire risk in rural areas • Historic heritage sites and archaeological areas 	
	26. Does the proposed policy adequately provide for the consideration of Māori interests in	<p>While the policy provides a good framework to consider Māori interests there are some issues including:</p> <ul style="list-style-type: none"> • Unclear how to balance Māori interests with other considerations 	Guidance on what constitutes adequate consultation and balance Māori interests with other considerations.

Proposed ND	Consultation question	WDC Feedback	Relief sought
	electricity networks?		
	27. Do you support the proposed policy to enable development of electricity networks in areas not protected by section 6 of the RMA, or covered by other national direction?	<p>Partial support noting issues:</p> <ul style="list-style-type: none"> • May not adequately protect other important values (section 7 RMA matters) • Risk of cumulative effects in rural landscapes 	Stronger consideration of cumulative effects and rural landscape values.
	28. Do the proposals cover all the matters that decision-makers should evaluate when considering and managing the effects of electricity network activities?	<p>Gaps:</p> <ul style="list-style-type: none"> • Limited consideration of social and economic effects • Insufficient guidance on cumulative effects assessment 	<p>Better integration with natural hazard management</p> <p>Guidance on cumulative effects assessment</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
	29. Do you support the proposed policy to enable routine works on existing electricity network infrastructure in any location or environment?	<p>Support with some changes</p> <p>Support because:</p> <ul style="list-style-type: none"> • Essential for network reliability and safety • Reduces regulatory burden for maintenance • Recognises practical realities of network operation 	<p>Clear definition of what constitutes "routine" - current definition too broad</p> <p>Stronger environmental standards for works in sensitive areas</p> <p>Notification requirements for affected parties</p> <p>Annual reporting on routine works undertaken</p>
	30. What other practical refinements to Policy 8 of the NPS-EN could help avoid adverse effects on outstanding natural landscapes, areas of high natural character, and areas of high recreation value and amenity in rural environments		<p>Landscape assessment requirements for all new lines development in rural areas with sensitive landscape overlays</p> <p>Timing restrictions for construction works to avoid peak tourism/recreation periods</p> <p>Stronger requirements to consider cumulative landscape effects from multiple transmission lines</p> <p>Clearer hierarchy of avoidance, then mitigation, then compensation</p> <p>Specific provisions for maintaining rural character and amenity</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
	31. Do you support the proposed policy to enable sufficient on-site space for distribution assets?	<p>Support with changes</p> <ul style="list-style-type: none"> • Should be proportionate to development scale 	<p>Clarify “sufficient space” definition</p> <p>Provide for flexibility for rural and low-density development</p> <p>Clear standards for different development types</p>
	32. Should developers be required to consult with electricity distribution providers before a resource consent for land development is granted? If not, what type or scale of works would merit such consultation?	<p>Support consultation requirements for:</p> <ul style="list-style-type: none"> • Subdivisions creating new lots • Industrial/commercial developments eg. >2000m² • Any development within 39 m of existing distribution infrastructure (aligns with Proposed Waitaki District Plan provisions. 	

Proposed ND	Consultation question	WDC Feedback	Relief sought
National Environmental Standards for Electricity Transmission Activities			
	33. What activity status is appropriate for electricity transmission network activities when these: a. do not comply with permitted activity standards? b. are located within a natural area or a historic heritage place or area?	<p>a. Non-compliance with permitted activity standards:</p> <p>Recommend Controlled activity status</p> <p>This provides certainty while allowing councils to manage specific effects through conditions. The proposed shift from restricted discretionary to controlled activity aligns with enabling routine activities while maintaining environmental protection.</p> <p>b. Activities in natural areas or historic heritage places:</p> <p>Recommend Controlled activity status</p> <p>These sensitive environments require assessment but should not prohibit necessary transmission activities. The proposed approach allows for effects management while recognising the national significance of transmission infrastructure.</p>	
	34. Do you support the proposed scope of	Support the proposed scope with minor refinements	Clearer guidance on "routine" vs "non-routine" activity distinctions

Proposed ND	Consultation question	WDC Feedback	Relief sought
	activities and changes to the permitted activity conditions for electricity transmission network activities?		
	35. Do you support the proposed matters of control and discretion for all relevant matters to be considered and managed through consent conditions?	Support the proposed matters with additions	Include operational and functional needs Add climate change benefits as a matter for consideration
	36. Would the <u>proposed National Grid Yard and Subdivision Corridor rules</u> be effective in restricting inappropriate development and subdivision underneath electricity lines?	Yes	

Proposed ND	Consultation question	WDC Feedback	Relief sought
	37. Do you support adding any or all of the five categories of regional activities to the NES-ENA as permitted activities?	Yes, where the effects can be demonstrated as minimal, then this approach helps standardise some activities. The ability to monitor compliance with these will still be required.	
	38. Do you support the proposed permitted activity conditions and the activity classes if these conditions are not met?	Yes	
	39. Do you support management plans being used to manage environmental impacts from blasting, vegetation management and earthworks?	Support management plan approach <ul style="list-style-type: none"> Provides flexibility while ensuring environmental protection 	Standardised templates to reduce preparation costs
	40. What is an appropriate activity status for electricity	Controlled activity status appropriate for both existing and new assets <ul style="list-style-type: none"> Support a consistent approach 	

Proposed ND	Consultation question	WDC Feedback	Relief sought
	distribution activities when the permitted activity conditions are not met, and should this be different for existing versus new assets?		
	41. What is your feedback on the scope and scale of the electricity distribution activities to be covered by the proposed NES-ENA?	Support broad scope covering high and low voltage	
	42. Do you support the proposed inclusion of safe distance requirements and compliance with some or all of the New Zealand Electrical Code of Practice for Electrical Safe Distances 34:2001?	Support for inclusion <ul style="list-style-type: none"> National consistency should improve compliance and awareness Reduces consenting uncertainty 	

Proposed ND	Consultation question	WDC Feedback	Relief sought
	43. Is the proposed NES-ENA the best vehicle to drive compliance with the New Zealand Electrical Code of Practice for Electrical Safe Distance 34:2001? If not, what other mechanisms would be better?	Yes <ul style="list-style-type: none"> Creates single point of reference Improves visibility of safety requirements 	
	44. Should the NES-ENA allow plan rules to be more lenient for electricity distribution activities proposed to be regulated?	No	Councils retain ability to be more enabling where appropriate Maintain NES-ENA as minimum standard (national consistency)
	45. Should the NES-ENA allow plan rules to be more stringent in relation to electricity distribution activities in specific environments? (eg, when located in a 'natural area').	Yes - for areas of higher natural and cultural values	

Proposed ND	Consultation question	WDC Feedback	Relief sought
	46. Do you support the proposed provisions to make private electric vehicle charging and associated infrastructure a permitted activity at home or at work?	Support	
	47. Have private or at work electric vehicle users been required to obtain a resource consent for the installation, maintenance and use of electric vehicle charging infrastructure?	Not where this is contained within existing vehicle parking areas as there is minimal effect. New standalone EV charging infrastructure for commercial use may benefit from resource consent considerations, but potentially a lower activity status, such as controlled or restricted discretionary.	
	48. Should the construction, operation and maintenance of electric vehicle charging infrastructure be a	Support permitted activity status where it is contained within existing transport infrastructure, but with safety considerations (e.g. setback from road carriageway) to be addressed.	Include safety considerations (e.g. setback from road carriageway)

Proposed ND	Consultation question	WDC Feedback	Relief sought
	permitted activity, if it is located in a land transport corridor?		
	49. Should the construction, operation and maintenance of electric vehicle charging infrastructure become a permitted activity, if it is ancillary to the primary activity or outside residential areas?	Support with conditions (height and setback restrictions reasonable for amenity protection)	

Proposed ND	Consultation question	WDC Feedback	Relief sought
National Environmental Standards for Telecommunication Facilities			
	High level summary	Recommend proceeding with Modified Option 1 incorporating some amendments to improve effectiveness and implementation and to ensure the provisions are appropriately tailored to district-level implementation.	<p>Provide additional central government support for council capability building</p> <p>Consider staged implementation for smaller territorial authorities</p> <p>Establish clear guidance on interaction with existing district plan provisions</p>
	51. Do the proposed provisions sufficiently enable the roll-out or upgrade of telecommunication facilities to meet the connectivity needs of New Zealanders?	No comment	
	52. Which option for proposed amendments to permitted activity standards for telecommunication	<p>Support Option 1 (fixed height caps by zone) with modifications to better reflect rural district realities.</p> <p>Rural zone</p> <ul style="list-style-type: none"> Support 35-metre rural height limit 	<p>Require technical justification for heights exceeding 35 metres in the rural zone</p> <p>Require consultation with immediate neighbours for heights</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
	facilities do you support?	<ul style="list-style-type: none"> Require technical justification for heights exceeding 35 metres <p>Flexibility in Residential zones</p> <ul style="list-style-type: none"> Support 20-metre residential limit Require consultation with immediate neighbours for heights exceeding 20 metres <p>Commercial/Industrial zones:</p> <ul style="list-style-type: none"> Support 25-metre limit <p>Temporary facilities:</p> <ul style="list-style-type: none"> Support the new provision for temporary facilities in emergencies and for events. 	<p>exceeding 20 metres in the residential zone</p> <p>Oppose facilities in road reserves adjacent to residential zones</p>
	53. Do the proposed provisions appropriately manage any adverse effects (such as environmental, visual or cultural effects)?	The provisions provide a reasonable framework but need strengthening in some areas for ease of implementation:	<p>Mandatory landscaping requirements for a pole or tower in rural sites exceeding 25 metres</p> <p>Strengthen consultation requirements for sites near wāhi tapu or areas of cultural significance</p> <p>Include provisions for cumulative visual impact assessment where</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
			multiple facilities are proposed in the same locality Clarify interaction with sensitive area overlays in district plans, so that replacement and minor upgrade is enabled, but new infrastructure requires consent.
	54. Do the proposed provisions place adequate limits on the size of telecommunication facilities in different zones?	Yes	
	55. Should a more permissive approach be taken to enabling telecommunication facilities to be inside rather than outside the road reserve?	Yes, with refinements:	Strengthen requirements for consultation with other utility providers Ensure adequate provision for ongoing road maintenance activities Consider impacts on future road widening or improvements

Proposed ND	Consultation question	WDC Feedback	Relief sought
			Additional controls for road reserves along tourist routes or scenic highways
	56. Do you support the installation and operation of fewer larger telecommunication facilities to support co-location of multiple facility operators?	Support co-location approach <ul style="list-style-type: none"> • One 35-metre tower preferable to multiple 25-metre installations 	Include plain design standards for larger facilities to minimise visual impact Recognise infrastructure efficiency in Long Term Plan processes Consider rating or development contribution advantages for shared facilities

Proposed ND	Consultation question	WDC Feedback	Relief sought
National Environmental Standards for Granny Flats (Minor Residential Units)			
	57. Are the proposed provisions in the NES-GF the best way to make it easier to build granny flats (minor residential units) in the resource management system?	<p>No</p> <p>The NES-GF undermines local councils' ability to deliver context-specific solutions and creates inconsistencies between planning and Building Act frameworks.</p> <p>Please also refer to WDC's previous feedback on this as it is understood that this will also be considered as well as any further comments below (see Attachment 2)</p>	
	58. Do you support the proposed permitted activity standards for minor residential units?	<p>Support in part</p> <p>Support the maximum size (80m²) and permeable surface standards.</p>	Building coverage, setback, height and height-to-boundary provisions should default to existing District Plan standards rather than creating parallel requirements that will cause confusion and neighbour disputes.
	59. Do you support district plans being able to have	Yes	

Proposed ND	Consultation question	WDC Feedback	Relief sought
	more lenient standards for minor residential units?	It is important to ensure councils can retain existing more enabling provisions (WDC's Proposed District Plan allows 80m ² MRUs). However, we have questions why the NES is needed if councils can already provide more lenient standards.	
	60. Should the proposed NES-GF align, where appropriate, with the complementary building consent exemption proposal?	Yes Alignment is essential to avoid confusion, though significant inconsistencies between the two proposals need resolution.	
	61. Do you support the proposed list of matters that local authorities may not regulate in relation to minor residential units? Should any additional matters be included?	No The prohibition on regulating parking and access removes necessary local flexibility.	Additional matters to include: Development contributions, and financial contributions under the RMA.
	62. Do you support existing district plan rules applying when one or more of the proposed permitted activity standards are not met?	Yes Maintains consistency and reduces complexity for both councils and applicants.	

Proposed ND	Consultation question	WDC Feedback	Relief sought
	63. Do you support the list of matters that are out of scope of the proposed NES-GF? Should any additional matters be included?	<p>Agree in part</p> <p>Support for most exclusions but concerned that natural hazards below section 6 RMA threshold may not be adequately considered, creating flood and hazard risks.</p> <p>Key concerns:</p> <p>Monitoring and compliance: No clear mechanism to ensure MRUs remain ancillary to principal dwellings rather than being used for commercial rental or visitor accommodation.</p> <p>Infrastructure costs: 80m² MRUs can accommodate typical 2-bedroom households but will not contribute to infrastructure costs, creating unfair burden on other ratepayers.</p> <p>Implementation costs: Councils must develop new administrative systems without cost recovery mechanisms resulting in additional financial costs for Councils.</p>	<p>Additional out-of-scope matters: Compliance monitoring mechanisms, rating implications, infrastructure connection requirements.</p> <p>Reconsider the Building Amendment Act 2012 approach for better consumer protection and appropriate cost recovery.</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
<u>National Environmental Standards for Papakāinga</u>			
	64. Do you support the proposal to permit papakāinga (subject to various conditions) on the types of land described above?	<p>WDC supports the principle of enabling papakāinga development on Māori ancestral land to address housing needs and cultural aspirations. However, we have concerns about the broad application across all zones without adequate consideration of local context.</p> <p>Key Points:</p> <ul style="list-style-type: none"> Support the intent to enable Māori housing development with appropriate cultural activities 	<p>Clearer guidance on how NES-P interacts with existing zone frameworks, particularly rural zones</p> <p>Stronger alignment with Natural Hazards provisions</p> <p>Transition provisions</p>
	65. What additional non-residential activities to support papakāinga should be enabled through the NES-P?	<p>Suggested Additions:</p> <ul style="list-style-type: none"> Primary production activities Cultural tourism activities Renewable energy generation Traditional resource gathering Emergency services/civil defence 	<p>Enable small-scale farming, market gardening, and food processing would support papakāinga sustainability</p> <p>Allow for cultural education and tourism, workshops / manufacturing</p> <p>Allow for small-scale traditional crafts and</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
			<p>community repair / maintenance facilities</p> <p>Allow for small-scale solar, wind, or micro-hydro to support community self-sufficiency</p> <p>Enable mahinga kai and traditional harvesting practices</p> <p>Allow for community resilience facilities</p> <p>Clear limits on commercial scale to prevent unfair competition with businesses in commercial zones</p>
	66. What additional permitted activity standards for papakāinga should be included?	<ul style="list-style-type: none"> Natural hazard resilience - Compliance with flood management and coastal hazard provisions Water supply and wastewater capacity - Demonstrable water security and appropriate wastewater treatment for community size 	<p>Zone-specific considerations:</p> <p>Rural zones: Higher standards for self-sufficiency in infrastructure</p> <p>Residential zones: Standards ensuring compatibility with established character</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none"> • Roading and access standards - Appropriate access for emergency services and waste collection • Landscaping/visual amenity - Buffer planting requirements where papakāinga adjoins different zones • Noise management - Appropriate limits for both generated and received noise • Stormwater management - On-site retention and treatment standards • Heritage protection - Standards to protect any archaeological sites or other heritage values • Biodiversity protection - Requirements to avoid significant indigenous vegetation and habitats 	Coastal areas: Enhanced natural hazard and public access provisions
	67. Which, if any, rules from the underlying zone should apply to papakāinga developments?	Rules That Should Apply: <ul style="list-style-type: none"> • All natural hazard provisions • Infrastructure capacity limitations • Heritage protection rules for scheduled sites and areas 	

Proposed ND	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none"> • Significant natural area and landscape protections • Subdivision and development engineering standards ensuring appropriate infrastructure provision • Height and bulk standards in residential zones - Maintaining established character expectations • Coastal protection and public access requirements - protecting public rights and coastal environment <p>Rules That Should Not Apply:</p> <ul style="list-style-type: none"> • Minimum lot size requirements (as specifically addressed by NES-P) • Density controls that would undermine papakāinga objectives • Some parking requirements (where community-based transport solutions exist) • Certain building coverage limits in rural zones where justified by cultural needs 	
	68. Should local authorities have restricted discretion over papakāinga on Treaty settlement land (ie, should	Yes, with refinements	<p>Additional matters of discretion:</p> <ul style="list-style-type: none"> • Infrastructure capacity and servicing

Proposed ND	Consultation question	WDC Feedback	Relief sought
	local authorities only be able to make decisions based on the matters specified in the proposed rule)?	<p>Support restricted discretion but recommend expanding the matters of discretion to include:</p> <ul style="list-style-type: none"> • Restricted discretion provides certainty while allowing consideration of local circumstances • Broader matters of discretion ensure all relevant effects can be properly considered • Maintains ability to impose appropriate conditions for site-specific circumstances 	<p>- Ensuring sustainable development that does not overload networks</p> <ul style="list-style-type: none"> • Natural hazard resilience - Particularly important given Waitaki's hazard exposure • Integration with surrounding land uses - Managing interface effects with farming, residential, or commercial activities • Transportation network impacts - Ensuring safe and efficient movement, particularly on rural roads • Cultural landscape values - Ensuring development enhances rather than detracts from cultural significance

Proposed ND	Consultation question	WDC Feedback	Relief sought
			<ul style="list-style-type: none"> • Landscape and biodiversity values to ensure alignment with s6 matters. • Community benefit demonstration - Confirming genuine community purpose rather than commercial development
	69. What alternative approaches might help ensure that rules to enable papakāinga on general land are not misused (for private/commercial use or sale)?	<p>Recommended safeguards:</p> <p>1. Legal Mechanisms:</p> <ul style="list-style-type: none"> • Covenant or consent notice requiring ongoing use as papakāinga • Governance structure demonstrating community management • Consequences for conversion to purely commercial use <p>2. Application Requirements:</p> <ul style="list-style-type: none"> • Demonstration of genuine cultural connection to land • Community governance plan showing long-term management structure 	Additional safeguards as noted in WDC's feedback

Proposed ND	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none"> • Cultural impact assessment showing benefit to Māori community • Commitment to ongoing cultural activities and community use <p>3. Design Requirements:</p> <ul style="list-style-type: none"> • Shared community facilities mandatory (eg. communal buildings) • Restriction on individual title subdivision • Community decision-making processes in development design <p>4. Monitoring and Enforcement:</p> <ul style="list-style-type: none"> • Regular territorial authority monitoring visits • Community-based reporting mechanisms • Clear enforcement procedures for non-compliance <p>5. Financial Mechanisms:</p> <ul style="list-style-type: none"> • Development contributions reflecting community nature • Bonds or financial guarantees for ongoing compliance • Preferential rates treatment contingent on genuine community use 	

Proposed ND	Consultation question	WDC Feedback	Relief sought
	70. Should the NES-P specify that the land containing papakāinga on general land cannot be subdivided in future?	<p>Yes, with exceptions</p> <p>Support subdivision restrictions with following provisions:</p> <p>Complete restriction for:</p> <ul style="list-style-type: none"> • Individual residential lots within papakāinga (preventing privatisation) • Core community areas (marae, communal facilities etc) • Areas specifically identified for cultural significance <p>Limited subdivision should be permitted for:</p> <p>Boundary adjustments</p> <ul style="list-style-type: none"> • Separation of different functional areas (residential, cultural, productive) while maintaining community ownership • Accommodation of infrastructure requirements • Natural hazard risk management (eg relocating development from hazard areas) 	

Proposed ND	Consultation question	WDC Feedback	Relief sought
<u>National Policy Statement for Natural Hazards</u>			
	71. Should the proposed NPS-NH apply to the seven hazards identified and allow local authorities to manage other natural hazard risks?	<p>Ensure natural hazard policies recognise rural areas face different risk profiles (flooding, drought, wildfire) and have different response capabilities than urban areas.</p> <p>WDC supports some degree of flexibility to manage additional hazards when appropriate to their local circumstances.</p> <p>The Waitaki PDP natural hazard definition includes volcanic and geothermal activity; sedimentation; wind; drought; wildfire hazards. The seven hazards were chosen on the basis that they were well understood by most councils. Resource consent preparation cost pressures may place less weight on other natural hazard policy.</p>	
	72. Should the NPS-NH apply to all new subdivision, land use and development, and not to infrastructure and primary production?	<p>While we understand the rationale for excluding infrastructure and primary production, this creates significant gaps for Waitaki. We have concerns around:</p> <ul style="list-style-type: none"> Critical infrastructure vulnerability: Excluding infrastructure from 	<p>NPS-NH to apply to all activities including infrastructure and primary production.</p> <p>Clearer guidance is developed on boundary definitions and a</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
		<p>systematic hazard assessment may create community resilience gaps</p> <ul style="list-style-type: none"> Economic impact: Primary production exclusion may miss opportunities to build climate resilience in our agricultural economy 	<p>tiered approach for critical infrastructure is considered. Extending coverage to include critical rural infrastructure.</p>
	73. Would the proposed NPS-NH improve natural hazard risk management in New Zealand?	Improvement depends on adequate implementation support, particularly for smaller councils	Adequate implementation support.
	74. Do you support the proposed policy to direct minimum components that a risk assessment must consider but allow local authorities to take a more comprehensive risk assessment process if they so wish?	Yes – WDC supports consistency while allowing local adaptation to address specific local conditions, flexibility for complex or high-risk developments and proportionality in assessment effort	
	75. How would the proposed provisions impact decision-making?	<p>Positive impacts:</p> <ul style="list-style-type: none"> More consistent and transparent decision-making Better integration of climate change considerations Clearer basis for consent conditions and mitigation requirements 	

Proposed ND	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none"> Improved defensibility of decisions <p>Challenges:</p> <ul style="list-style-type: none"> Increased processing time and costs Need for enhanced technical expertise Potential for more complex consent processes Risk of over-conservative decisions due to uncertainty <p>Resource implications: Significant increase in technical assessment requirements will require additional staff training and possible external consultant support.</p>	
	76. Do you support the placement of very high, high, medium and low on the matrix?	<p>Yes, in that it attempts to assign 'significance' to an event / activity. However technical capacity building is required in Waitaki.</p> <p>WDC suggests:</p> <ul style="list-style-type: none"> Regional calibration workshops to ensure consistent application Examples of how the matrix applies to common scenarios (coastal development, rural-residential, commercial) 	

Proposed ND	Consultation question	WDC Feedback	Relief sought
	77. Do you support the definition of significant risk from natural hazards being defined as very high, high, medium risk, as depicted in the matrix?	Yes. However technical capacity building is required with support from Central Government. Also, with two regional councils in Waitaki District, there is a need for consistency that requires increased technical capacity with the Flood Assessment Overlay across both parts of our district (Canterbury and Otago regions) We note: some "medium" risk scenarios may require minimal intervention in rural settings.	Guidance would be useful on assessing multiple hazards affecting single sites The framework should allow consideration of mitigation cost-effectiveness
	78. Should the risks of natural hazards to new subdivision, land use and development be managed proportionately to the level of natural hazard risk?	Yes, this approach is already adopted in Waitaki through its PDP therefore aligns with our current practice and provides a better framework for consistent application.	
	79. How will the proposed proportionate management approach make a difference in terms of existing practice?	Variable, as proportionate management is embedded in Waitaki's PDP in terms of Activity status and our Spatial growth plan.	Development of risk-based consent condition templates to guide the consistent approach proposed and a structured mitigation hierarchy
	80. Should the proposed NPS-NH direct local authorities to use the best available information	The lack of NH knowledge for many rural councils is such that what may be legally robust may come at the expense of out-dated, limited knowledge and resulting poor	Best practice guidance on what constitutes "best available information" and

Proposed ND	Consultation question	WDC Feedback	Relief sought
	in planning and resource consent decision-making?	decision-making. Also, legal challenges may turn on what information is considered 'still incomplete or uncertain' (P4, P6).	how to handle information gaps.
	81. What challenges, if any, would this approach generate?	Legal / challenges may turn on what information is considered 'still incomplete or uncertain.' It is noted that the NZCPS (Policy 24) considers the best available information concerning coastal hazards.	
	82. What additional support or guidance is needed to implement the proposed NPS-NH?	<p>Technical capacity building resource funding by Central Government for LAs as part of the National Adaptation Framework work underway.</p> <p>Technical Guidance:</p> <ul style="list-style-type: none"> • Detailed application guides for each hazard type • Regional hazard mapping standards and methodologies • Climate change projection integration protocols • Mitigation measure effectiveness guidelines • Direction on "climate change scenario" to be used 	

Proposed ND	Consultation question	WDC Feedback	Relief sought
		<p>Capacity building:</p> <ul style="list-style-type: none"> • Training programmes for council staff • Accreditation system for hazard assessment practitioners • Technical advisory panels for complex cases • Peer review networks for small councils <p>Financial support:</p> <ul style="list-style-type: none"> • Hazard mapping and assessment funding • Specialist consultant cost-sharing arrangements • Technology and software licensing support • Legal indemnity frameworks <p>Tools and resources:</p> <ul style="list-style-type: none"> • Standardised assessment templates • GIS-based hazard mapping platforms • Decision-support tools for proportionate management • Case study libraries for common scenarios 	
	83. Should the NZCPS prevail over the proposed NPS-NH?	Yes, as the NZCPS incorporates NH risk including the location of infrastructure away from areas of hazard risk where practicable.	Clear guidance on where NZCPS jurisdiction ends.

Proposed ND	Consultation question	WDC Feedback	Relief sought
		<p>(Policy 25: Subdivision, use, and development in areas of coastal hazard risk.)</p> <p>Practical application:</p> <ul style="list-style-type: none"> Many Waitaki developments span coastal and inland areas Streamlined assessment processes to avoid duplication 	<p>Guidelines around how to coordinate NZCPS and NPS-NH requirements.</p> <p>Ensure compatible approaches between instruments.</p>
	84. Does 'as soon as practicable' provide enough flexibility for implementing this suite of new national policy statements and amendments?	<p>Councils need realistic timeframes that allow proper consultation and plan development, particularly around the "as soon as practicable" provision which could be problematic for smaller councils with few planning staff.</p> <p>"As soon as practicable" creates uncertainty and potential legal challenges.</p>	<p>Staged implementation: Different timelines for different components</p> <p>Capacity-based flexibility: Adjustments based on council size and resources</p> <p>Clear milestones: Specific deliverables and timeframes</p>
	85. Is providing a maximum time period for plan changes to fully implement national policy statements to be notified sufficient? a. If not, what would be better, and why? b. If yes, what time	<p>Yes. However different time periods should apply for differently resourced tier councils. Many rural councils, like Waitaki need time to undertake technical work whereas other larger councils have a great deal of NH information / resources and would need a shorter time period.</p>	<p>No less than 5 years with extension provisions for exceptional circumstances with central government approval</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
	period would be reasonable (eg, five years), and why?		
	86. Is it reasonable to require all plan changes to fully implement a national policy statement before or at plan review?	At Plan Review. However, the lack of a date for the NPS-NH given the RMA change is understandable.	<p>Risk-based prioritisation: Immediate changes for high-risk areas</p> <p>Comprehensive integration: Full implementation at scheduled plan review</p> <p>Interim measures: Temporary provisions for urgent situations</p>
	87. Are there other statutory or non-statutory implementation provisions that should be considered?	Central Government funding education programmes through CDEM. Building Act 2004 complementary Planning hazard development.	

Package 2: Primary Sector

Proposed ND	Consultation question	WDC Feedback	Relief sought
National Environmental Standards for Marine Aquaculture	1. Have the key problems been identified?	No comment	
	2. Do the proposed provisions adequately address the three issues identified?	No comment	
	3. What are the benefits, costs or risks of the proposed changes?	No comment	
	4. Do you support the proposed amendments to streamline specific applications to change consent conditions by making them controlled activities?	No comment	
	5. Should there be any further changes to the matters of control specified in <u>attachments 2.1 and 2.1.1?</u>	No comment	

Proposed ND	Consultation question	WDC Feedback	Relief sought
	6. Should any other types of changes to consent conditions be included?	No comment	
	7. Do you support the proposed changes to better enable research and trial activities on existing farms and in new spaces, including making some activities permitted?	No comment	
	8. Are there benefits in making small-scale structures permitted activities, instead of controlled activities?	No comment	
	9. Should there be any changes to the entry requirements, matters of control and matters of discretion specified in attachment 2.1.1?	No comment	

Proposed ND	Consultation question	WDC Feedback	Relief sought
National Environmental Standards for Commercial Forestry			
	High level summary	<p>WDC does not support the proposal to remove the ability of local councils to control afforestation.</p> <p>While the government is recognising the potential impact of forestry on rural communities through amendments to the ETS, an element of local control, to manage local issues, is necessary for effective management of any environmental issue, including forestry.</p>	
	10. Does the proposed amendment to 6(1)(a) enable management of significant risks in your region?	Potentially, if there is the ability to enable council to set rules to manage the fire risk of a new forest near an existing township that may require a greater setback than the 30m contained in the NES-CF.	
	11. Does the proposal provide clarity and certainty for local authorities and forestry planning?	Not particularly – see comments for questions 10 and 12.	

Proposed ND	Consultation question	WDC Feedback	Relief sought
	12. How would the removal of 6(4A) impact you, your local authority or business?	This would reduce council's ability to manage other risks from commercial forestry, such as fire, as mentioned above.	
	13. Do you support amendments to regulations 69(5-7) to improve their workability?	No comment as a regional council issue.	
	14. Do you support a site-specific risk-based assessment approach or a standard that sets size and/or volume dimensions for slash removal?	No comment as a regional council issue.	
	15. Is the draft slash mobilisation risk assessment template (provided in attachment 2.2.1 to this document) suitable for identifying and managing risks on a site-specific basis?	No comment as a regional council issue.	

Proposed ND	Consultation question	WDC Feedback	Relief sought
	16. Should a slash mobilisation risk assessment be required for green-zoned and yellow-zoned land? If so, please explain the risks you see of slash mobilisation from the forest cutover that need to be managed in those zones?	No comment as a regional council issue.	
	17. If a risk-based approach is adopted which of the two proposed options for managing high-risk sites, do you prefer (ie, requiring resource consent or allowing the removal of slash to a certain size threshold as a condition of a permitted activity)?	No comment as a regional council issue.	
	18. For the alternative option of setting prescriptive regulations	No comment as a regional council issue.	

Proposed ND	Consultation question	WDC Feedback	Relief sought
	for slash management, is the suggested size and/or volume threshold appropriate?		
	19. Do you support the proposed definition of cutover to read "cutover means the area of land that has been harvested"?	Yes, if the effects on water bodies and floodwater flow paths are addressed elsewhere.	
	20. Do you support the proposed removal of the requirement to prepare afforestation and replanting plans?	No, these provide certainty to councils for future land use, as well as for rating purposes (i.e. keeping rates records updated) and roading infrastructure that may be needed.	
	21. Do you support the proposed minor text amendments?	No comment	

Proposed ND	Consultation question	WDC Feedback	Relief sought
<u>New Zealand Coastal Policy Statement</u>			
	22. Would the proposed changes achieve the objective of enabling more priority activities and be simple enough to implement before wider resource management reform takes place?	Yes, the changes would enable priority activities relevant to Waitaki eg. renewable energy, WDC does have some implementation concerns.	Clear guidance on transition arrangements for applications in progress
	23. Would the proposed changes ensure that wider coastal and marine values and uses are still appropriately considered in decision-making?	WDC cautiously supports the proposed changes. Key concerns for Waitaki's coastal environment: <ul style="list-style-type: none"> • Cumulative effects of multiple priority activities not adequately addressed • Cultural values and coastal mahinga kai areas must remain protected • Community assets and recreational areas require consideration 	Clear guidance on effects management hierarchy when policies conflict Cumulative effects assessment requirements Enhanced consultation for culturally significant areas Implementation monitoring to ensure balanced outcomes
	24. Are there any further changes to the proposed provisions that should be considered?		Implementation Support: <ul style="list-style-type: none"> • Clear grandfathering provisions for current applications Effects Management:

Proposed ND	Consultation question	WDC Feedback	Relief sought
			<ul style="list-style-type: none"> Guidance on applying avoid-remedy-mitigate hierarchy when activity and protection policies conflict Cumulative effects assessment framework <p>Regional Coordination:</p> <ul style="list-style-type: none"> Cross-boundary activity provisions District/regional council coordination requirements <p>Monitoring Framework:</p> <ul style="list-style-type: none"> Implementation effectiveness monitoring <p>Rural-Coastal Interface:</p> <ul style="list-style-type: none"> Streamlined approaches for smaller-scale activities
			<p>Technical clarity:</p> <ul style="list-style-type: none"> Define "significant regional/national benefits" <p>Clear decision-making framework when multiple policies apply</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
National Policy Statement for Highly Productive Land			
	High level summary	While the underlying soil quality is important, other factors should be considered to maintain our dwindling land area available for future productive purposes. Appropriate localised planning processes should be used to inform this.	Any removal of LUC 3 classification should only occur once special agricultural areas are identified and embedded in planning documents.
	25. Should LUC land be exempt from NPS-HPL restrictions on urban development (leaving LUC 3 land still protected from rural lifestyle development) or, should the restrictions be removed for both urban development and rural lifestyle development?	This approach also reduces fragmentation of productive land and preserves the integrity of rural areas and remaining HPL.	Support for urban development only as this focuses urban growth into areas supported by infrastructure and services and reduces urban sprawl into rural areas.
	26. If the proposal was to exempt LUC 3 land from NPS-HPL restrictions for urban development only, would it be better for it to be for local authorities led urban rezoning only, or	In the Waitaki context, LUC 3 land is often located near centres such as Ōamaru, Weston and Kakanui, and the potential for urban development needs to be carefully balanced with the district's strong rural productive economy.	

Proposed ND	Consultation question	WDC Feedback	Relief sought
	should restrictions also be removed for private plan changes to rezone LUC 3 land for urban development?	<p>Given the strategic importance of LUC 3 land for both food production and future housing needs, it is recommended that urban rezoning of LUC 3 land be led by local authorities through spatial planning and district plan processes. This approach ensures:</p> <ul style="list-style-type: none"> • Strategic alignment with Spatial and District Plans and accounts for existing and future infrastructure planning. • Protection of productive land from ad hoc or fragmented development. • Community input and transparency, especially in areas where land use changes may affect rural character or environmental values. <p>Allowing private plan changes would potentially accelerate new development but risks undermining coordinated planning efforts and may lead to inconsistent outcomes and poorly serviced development. However, there could be some merit in enabling private plan changes under strict criteria, such as:</p> <ul style="list-style-type: none"> • Alignment with council spatial strategies and district plans. • Demonstrated infrastructure capacity. • Avoidance of reverse sensitivity effects on nearby productive land. 	

Proposed ND	Consultation question	WDC Feedback	Relief sought
		Council-led rezoning should be the default mechanism, with limited scope for private plan changes where they clearly support spatial and district plan objectives.	
	27. If LUC 3 land were to be removed from the criteria for mapping HPL, what, other consequential amendments will be needed? For example, would it be necessary to: a. amend 'large and geographically cohesive' in clause 3.4(5)(b) b. amend whether small and discrete areas of LUC 3 land should be included in HPL mapping clauses 3.4(5)(c) and (d) c. amend requirements for mapping scale and use of site-specific assessments in clause 3.4(5)(a), and amend definition of LUC 1, 2 or 3 land d. remove discretion for councils to map additional land under	If LUC 3 is removed from the criteria for mapping of HPL, several rule changes would be needed to ensure clarity and consistency	<p>Update Definitions – The definition of HPL and LUC classifications would need to be revised to reflect the exclusion of LUC 3 land.</p> <p>Adjust Mapping Criteria – Clauses that refer to mapping scale, site-specific assessments, and inclusion of small or cohesive areas of LUC 3 land should be amended.</p> <p>Council Discretion – The ability for councils to map additional land as HPL may need to be limited or clarified to prevent inconsistent application.</p> <p>Improve Mapping Detail – More precise LUC data, including farm-scale and sub-class analysis, could help better define HPL boundaries and improve planning accuracy.</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
	clause 3.4(3). e. use more detailed information about LUC data to better define HPL through more detailed mapping, including farm scale and/or more detailed analysis of LUC units and sub-classes.		
	28. Given some areas important for foods and fibre production such as Pukekohe and Horowhenua may be compromised by the removal of LUC land, should additional criteria for mapping HPL be considered as part of these amendments?	<p>While regions like Pukekohe and Horowhenua face significant risks to food and fibre production from the removal of LUC 3 land from HPL mapping, the situation in Waitaki is more nuanced.</p> <p>Waitaki has a mix of LUC 2 and 3 land, with LUC 3 making up a substantial portion of land near urban centres like Ōamaru, Weston, and Kakanui. Much of this land adjoins LUC 2 areas and supports horticulture and grazing, and while not as intensively used as in Pukekohe / Horowhenua, it still contributes meaningfully to local food systems and rural economies and will need to be protected for future food production.</p>	Additional criteria for mapping HPL especially if LUC 3 land is excluded.

Proposed ND	Consultation question	WDC Feedback	Relief sought
		In Waitaki, excluding LUC 3 land from HPL mapping risks overlooking land that is locally important for rural productivity. Introducing additional criteria would help ensure that genuinely productive and strategically valuable land continues to be protected, even if it does not meet the LUC 1 or 2 classification.	
	29. If so, what additional criteria could be used to ensure areas important for food and fibre production are still protected by NPS-HPL?	<ul style="list-style-type: none"> • Actual land use and productivity: Mapping should reflect not just soil classification but also current and potential land use for food and fibre production. • Infrastructure and water access: Areas served by irrigation schemes or proximity to processing facilities may warrant protection regardless of LUC class. • Climate resilience and versatility: Land that supports diverse crops or is resilient to climate variability should be considered more valuable. • Local food security: Mapping should account for the role of land in supporting regional food supply chains, especially in districts like Waitaki with no 	

Proposed ND	Consultation question	WDC Feedback	Relief sought
		LUC 1 land and limited LUC 2 land interspersed amongst LUC 3 land.	
	30. What is appropriate process for identifying special agricultural areas should be? Should this process be led by local government or central government?	<p>Support a mix of national and local government approach. Central government to provide clear mapping criteria to ensure consistency and resources to support implementation, with regional/district identifying SAA's based on local understanding and community priorities. This approach would also support alignment with spatial/district/regional plans and the potential for community engagement.</p> <p>A central government-led process, supported by regional and local government expertise, offers the best balance of consistency, accuracy, and responsiveness to local needs. This approach ensures SAA's are identified consistently and effectively across NZ.</p>	
	31. What are the key considerations for the interaction of special agriculture areas with other national direction – for example, national direction for freshwater?	Careful alignment with other NPS to avoid conflicting objectives and ensure integrated land use planning.	<p>Ensure that SAAs do not override objectives of the NPS-IB.</p> <p>Clear criteria needed to balance housing requirements under the NPS-UD with the protection of productive land, especially near urban fringes. Spatial planning should guide where</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
			SAAs are located to avoid future land use conflicts.
	32. Should timeframes for local authorities to map highly productive land in regional policy statements be extended based on revised criteria? Alternatively, should the mapping of HPL under the RMA be suspended to provide time for a longer-term solution to managing highly productive land to be developed in the replacement resource management system?	In the Waitaki District, where land use pressures are growing near urban areas like Ōamaru and Weston, a targeted extension of mapping timeframes is preferable as this allows for: <ul style="list-style-type: none"> • Proper integration of revised criteria and updated definitions. • Alignment with spatial/regional/district plans and community engagement. • Continued protection of HPL while adapting to the changes. 	
	General comments	<ul style="list-style-type: none"> • Note concern around the potential undermining of the NPS-HPL purpose. The proposal will result in a significant reduction in the land to which the HPL applies in the Waitaki district • Local Impact: Continued uncertainty for landowners and developers • Still no ability to rely on updated mapping in consent processes 	<p>Request interim provisions and clearer timelines</p> <p>LUC removal should be limited to Council led plan changes only and not private plan changes</p> <p>Waitaki requests for SAA's to be considered given our unique soils that overlap with LUC 2 and LUC 3.</p>

Proposed ND	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none">• Uncertainty around criteria and establishment process for SAA's• Administrative burden if Schedule 1 process required for SAA's	<p>Regional councils be given more time for mapping of HPL.</p> <p>Clarify process and criteria for SAA consideration.</p>

Topic	Consultation question	WDC Feedback	Relief sought
Multiple instruments for quarrying and mining provisions	33. Do you support the proposed amendments to align the terminology and improve the consistency of the consent pathways for quarrying and mining activities affecting protected natural environments in the <u>NPS-FM</u> , <u>NES-F</u> , <u>NPSIB</u> and <u>NPS-HPL</u> ?	<p>Support consistency between instruments while noting concern around future environmental degradation through less environmental protection measures,</p> <p>WDC notes that the NPS-IB, NPS-FM and NPS-HPL all provide consent pathways for quarrying and mining that will adversely affect SNA's, wetlands and highly productive land. The NPS-I also enables quarrying as an infrastructure supporting activity.</p> <p>The overlay of these national instruments results in a dramatic shift in the needle of sustainable environment management and the consideration of intergenerational equity through resource management.</p>	
	34. Are any other changes needed to align the approach for quarrying and mining across national direction and with the consent pathways provided for other activities?	No	

Topic	Consultation question	WDC Feedback	Relief sought
	35. Should "operational need" be added as a gateway test for other activities controlled by the <u>NPS-FM</u> and <u>NES-F</u> ?	The consistent approach of adding operational need to functional need for these activities will likely result in less environmental protection and resulting degradation for future generations.	

Proposed ND	Consultation question	WDC Feedback	Relief sought
<u>Stock Exclusion Regulations</u>			
	36. Do you agree that the cost of excluding stock from all natural wetlands in extensive farming systems can be disproportionate to environmental benefits?	Partly, however this is likely to differ across regions within New Zealand depending on the environmental conditions for each wetland, e.g. coastal v arid inland.	

Topic	Consultation question	WDC Feedback	Relief sought
Implementation of primary sector instruments			
	37. Does "as soon as practicable" provide enough flexibility for implementing this suite of new national policy statements and amendments?	<p>No, "as soon as practicable" is insufficient for Waitaki District Council because:</p> <ul style="list-style-type: none"> • Resource constraints - our planning team is small and already managing significant workloads • Technical complexity - freshwater planning requires specialist expertise that may need to be contracted externally • Community engagement - meaningful consultation with our rural and urban communities takes time, particularly across our geographically dispersed district • Integration challenges - coordinating multiple NPS changes simultaneously while maintaining business-as-usual operations 	Specific timeframes with built-in flexibility for genuine resource or technical constraints
	38: Is providing a maximum time period for plan changes to fully implement national policy	<p>This should include provisions for extensions where genuine constraints exist.</p> <p>Other factors to consider include:</p>	

Topic	Consultation question	WDC Feedback	Relief sought
	statements to be notified sufficient?	<ul style="list-style-type: none"> Aligning with Long Term Plan review cycles Time to budget for specialist assistance and community engagement Allowing councils to build expertise and learn from early implementers 	
	39: Is it reasonable to require all plan changes to fully implement a national policy statement before or at plan review?	<p>Yes with some modifications:</p> <ul style="list-style-type: none"> Staged implementation - allow critical elements first, refinements later Funding support - central government assistance for smaller councils Flexibility provisions - ability to seek extensions for genuine resource constraints Integration opportunities - coordinate with other plan changes where practical 	
	40. Are there other statutory or non-statutory implementation provisions that should be considered?	<p>Statutory support:</p> <ul style="list-style-type: none"> Funding mechanisms - rates relief or central government grants for implementation costs Enable councils to pool resources for specialist expertise 	

Topic	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none"> • Protection of existing consents and established activities during implementation • Reasonable grace periods for compliance with new requirements <p>Non-statutory support:</p> <ul style="list-style-type: none"> • Detailed practice notes and worked examples for smaller councils • Capability building • Peer support networks • Regular review of how changes are working in practice 	

Attachment 2: Waitaki District Council input into MBIE ‘Granny Flats’ Proposal – submitted August 2024

Summary

WDC supports the intent of the proposal but acknowledges that it will not fix the problem. We believe that other tools could be applied and be more effective in achieving the desired outcomes.

Problem definition - what we want to address

Question Title

1. Have we correctly defined the problem?

Yes	No	Not sure/no preference
Yes	<u>No</u>	Not sure/no preference

Are there other problems that make it hard to build a granny flat? Please explain your views.

WDC considers that the proposal is heavy-handed policy response to a minor problem with little actual benefit. There is no detailed cost – benefit analysis to support the proposal. The proposal requires high implementation costs that have not been factored into its design.

Promoting one-level detached units is inconsistent with current national directions around intensification. While not an issue in the Waitaki District, local government is still required to give effect to higher level directions.

Small houses still require the same basic infrastructure services as larger houses eg. kitchen and bathroom. These are costly parts of a build.

Outcome and principles – what we want to achieve

Question Title

2. Do you agree with the proposed outcome and principles?

Yes, I agree	I agree in part	No, I don't agree	Not sure/no preference
Yes, I agree	<u>I agree in part</u>	No, I don't agree	Not sure/no preference

Are there other outcomes this policy should achieve? Please explain your views.

WDC notes that the outcome and principles refer to “granny flats” and “intergenerational living and aging in place” however, these principles are not reflected in the rest of the document. WDC considers that tenancy requirements will dominate market thinking under the proposal with the inability for local councils to adequately address issues arising from the small houses being used by a wide range of people, and not those linked to the family who owns the property.

The principles also do not address the financing of smaller homes, bank lending restrictions, or the insurability of unconsented habitable buildings.

Safeguards – what risks need to be managed

Question Title

3. Do you agree with the risks identified?

Yes, I agree	I agree in part	No, I don't agree	Not sure/no preference
Yes, I agree	<u>I agree in part</u>	No, I don't agree	Not sure/no preference

Are there other risks that need to be considered? Please explain your views.

Financial contributions under the RMA are unable to be charged by consent authorities under the proposal.

The increased cost on local authorities (and ratepayers) on monitoring and potential enforcement of MRUs needs to be considered.

The financial risk to owners when construction fails - the current LBP scheme doesn't include any assessment of the practitioner's ability to cover any liabilities that they incur if there are issues with their work. Homeowners are out at a higher risk if there was to be a failure in the building.

The current consenting system provides for consumer protection – the proposal would not provide for this. This has the potential to result in a liability to BCA's if the proposal does not allow the liability to be transferred from the BCA to the owner. This risk in itself could further weaken the desire for the insurance market to insure Council's in New Zealand. The availability of PI PL cover in New Zealand has significantly changed over the last few years both in providers and in value of cover.

Natural hazard risk assessments could be compromised by this proposal eg. the impacts of secondary flow paths on sites may not be considered, resulting in flooding issues.

The Building Act

Question Title

4. Do you agree with the proposed option (option 2: establish a new schedule in the Building Act to provide an exemption for simple, standalone dwellings up to 60 square metres) to address the problem?

Yes, I agree	I agree in part	No, I don't agree	Not sure/no preference
Yes, I agree	I agree in part	<u>No, I don't agree</u>	Not sure/no preference
Please explain your views.			

The proposed changes to Schedule 1 of the Building Act may require local councils to become involved when compliance is needing to be achieved, and this could result in a costly process for the owner to fix any issues.

Local councils will still need to be involved in administrative processes associated with the proposal such as receiving notification of a proposal, accompanying information, notification of completed works. Many of these are new, which will require additional systems to be developed.

There is no mechanism to verify that work completed has being undertaken by an LBP and/or authorised person.

Building consents are one of the three points at which local authorities can charge development contributions under the LGA2002 (Sec 198); services will be in place already for a second dwelling on a parcel and therefore local authorities may not be able to collect development

contributions at all for the second dwelling. Alternatively, people could illegally tap into existing services, avoiding a trigger for development contributions.

Question Title

5. What other options should the government consider to achieve the same outcomes (see Appendix 1)?

WDC considers that the Building Amendment Act 2012 delivers a better solution to the proposal through the introduction of new categories of buildings which simplify the process and its associated costs eg. CCC's being recorded on Council files, the ability to recover development contributions and the ability to reassess rates applicable to the property.

Question Title

6. Do you agree with MBIE's assessment of the benefits, costs and risks associated with the proposed option in the short and long term?

Yes, I agree	I agree in part	No, I don't agree	Not sure/no preference
Yes, I agree	<u>I agree in part</u>	No, I don't agree	Not sure/no preference

Please explain your views.

WDC does not consider that all the relevant costs and benefits (direct and indirect) have been factored into the proposal.

Building consents provide value that is likely to exceed the monetary value of the consent as discussed further in our submission.

The risk of non-compliance is the same for a small versus a large house.

Connections to Council infrastructure by unauthorised persons could result in additional work required to make the works compliant.

Conditions that must be met to build a small standalone dwelling without a building

Question Title

7. Are there any other benefits, costs or risks of this policy that we haven't identified?

In the Waitaki District (and similar in other locations), building consent fees make up a small percentage of the cost of a build of a 'granny flat' type building cost compared to the cost of materials has risen well above the CPI in the last few years post Covid.

Local councils will likely incur additional costs relating to regulatory compliance – for smaller Councils with limited capacity, this could be a significant issue.

Proposed Building Consent Exemption Conditions

Question Title

8. Are there additional conditions or criteria you consider should be required for a small standalone house to be exempted from a building consent?

Currently there is not a great understanding of existing exemptions which causes TA's a lot of compliance work. This is due to some work that might fit within the exemption not being constructed strictly in accordance with the exemption eg. too close to boundary, too high, too close to another building etc. WDC has concerns that this will increase compliance work and subsequently notice to fix.

In the Waitaki District, current failure rates for consented buildings of a similar complexity to those proposed in the exemption are ~50%. WDC is concerned that this proposal will result in habitable buildings that do not comply with the building code.

Question Title

9. Do you agree that current occupational licensing regimes for Licensed Building Practitioners and Authorised Plumbers will be sufficient to ensure work meets the building code, and regulators can respond to any breaches?

Yes, I agree	I agree in part	No, I don't agree	Not sure/no preference
Yes, I agree	I agree in part	<u>No, I don't agree</u>	Not sure/no preference
Please explain your views.			

The robustness of accreditation for LBP's is limited compared to that of BCA's. WDC does not have confidence that compliant buildings will be constructed without at least some form of oversight by a third party, such as a BCA.

Question Title

10. What barriers do you see to people making use of this exemption, including those related to contracting, liability, finance, insurance, and site availability?

There is a high likelihood of private connections to the mains being made without Council's knowledge, making breaches or non-compliance difficult to navigate for local councils.

WDC is also concerned around liability being left to owners.

WDC also notes that insurance could become an issue for houses that have not had third-party overview.

Question Title

11. What time and money savings could a person expect when building a small, standalone dwelling without a building consent compared to the status quo?

The proposal requires building design, notification and completion to the local council, and associated administration incurred by local councils with associated costs being passed onto the applicant.

Under the current system, the time taken in the consent process has a direct correlation to the quality of the building consent received by the BCA. Waitaki's Removing levies and new servicing costs, the costs of a building consent do not vary largely from small to large builds.

Question Title

12. Is there anything else you would like to comment on regarding the Building Act aspects of this proposal?

No further comment.

The Resource Management Act 1991

The focus of the proposed policy is to enable small, detached, self-contained, single storey houses for residential use. Under the Resource Management Act (RMA), the term 'minor residential unit' (MRU) is defined in the National Planning Standards as "a self-contained residential unit that is ancillary to the principal residential unit and is held in common ownership with the principal residential unit on the same site". The proposal is to focus the policy in the RMA on enabling MRUs.

It is proposed that this policy applies across New Zealand and is not limited to certain territorial authorities. The proposed focus of the policy is on enabling MRUs in rural and residential zones.

Scope of the policy under the Resource Management Act

Question Title

13. Do you agree that enabling minor residential units (as defined in the National Planning Standards) should be the focus of this policy under the RMA?

Yes, I agree	I agree in part	No, I don't agree	Not sure/no preference
Yes, I agree	<u>I agree in part</u>	No, I don't agree	Not sure/no preference

For many years, Waitaki District Council has enabled family flats through its District Plan provisions, and this has supported the outcomes sought, noting that there is not a high demand for them in a district with a high proportion of elderly population, particularly given that a granny/family flat only provides a short-term solution for a limited period of time. Once the granny/family flat is no longer needed, then it becomes a problem to deal with by the owner.

The existing national planning framework also currently enables further housing.

We also note inconsistencies between the RMA91 and the Building Act with the later not indicating that a granny flat would need to be a secondary dwelling.

Question Title

14. Should this policy apply to accessory buildings, extensions and attached granny flats under the RMA?

Yes, I agree	I agree in part	No, I don't agree	Not sure/no preference
Yes, I agree	<u>I agree in part</u>	No, I don't agree	Not sure/no preference

Only to the extent of an attached granny flat as this has minor difference in effects compared to a standalone unit, providing other relevant bulk and location standards are met.

Where the granny flat policy will apply

Question Title

15. Do you agree that the focus of this policy should be on enabling minor residential units in residential and rural zones?

Yes, I agree	I agree in part	No, I don't agree	Not sure/no preference
Yes, I agree	I agree in part	<u>No, I don't agree</u>	Not sure/no preference

The focus should be on enabling these in urban areas where the intended user of the family flat also needs access to services and infrastructure. By encouraging them in rural areas does not provide for ease of access to such things. Many rural zone provisions already allow for a second minor residential unit and/or contain enough land to construct a second dwelling. This is the case for Waitaki under its Proposed District Plan.

Question Title

16. Should this policy apply to other zones? If yes which other zones should be captured and how should minor residential units be managed in these areas?

Yes	No	Not sure/no preference
<u>Yes</u>	No	Not sure/no preference

Potentially in Rural Lifestyle zones as sites in these zones have capacity for additional buildings and are often still close enough to services.

Matters that are out of scope of the granny flat policy

Question Title

17. Do you agree that subdivision, matters of national importance (RMA section 6), the use of minor residential units and regional plan rules are not managed through this policy?

Yes, I agree	I agree in part	No, I don't agree	Not sure/no preference
<u>Yes, I agree</u>	I agree in part	No, I don't agree	Not sure/no preference

Please explain your views.

Local councils need to give effect to national direction regardless of District Plan settings. There is some concern that natural hazard risk less than significant may not be considered through the proposal as they are not considered to be a section 6 RMA issue.

Question Title

18. Are there other matters that need to be specifically out of scope?

Proposal under the Resource Management Act

Question Title

19. Do you agree that a national environmental standard for minor residential units with consistent permitted activity standards (option 4) is the best way to enable minor residential units in the resource management system?

Yes, I agree	I agree in part	No, I don't agree	Not sure/no preference
Yes, I agree	<u>I agree in part</u>	No, I don't agree	Not sure/no preference

See reasons in previous responses above.

Applying consistent permitted activity standards may undermine the ability of local councils through their District Plans to deliver local solutions to suit the local context.

Question Title

20. Do you agree district plan provisions should be able to be more enabling than this proposed national environmental standard?

Yes, I agree	I agree in part	No, I don't agree	Not sure/no preference
Yes, I agree	<u>I agree in part</u>	No, I don't agree	Not sure/no preference

To the extent that might allow a larger MRU, such as contained in the Proposed Waitaki District Plan provisions at 80m2.

Question Title

21. Do you agree or disagree with the recommended permitted activity standards? Please specify if there are any standards you have specific feedback on.

Yes, I agree	I agree in part	No, I don't agree	Not sure/no preference
Yes, I agree	<u>I agree in part</u>	No, I don't agree	Not sure/no preference

The building coverage, setback, height and height to boundary provisions should be removed from the proposed NES and default to those contained in a relevant district plan. There is no need to specify different bulk and location standards as it will cause confusion and more neighbour disputes.

The maximum size and permeable surface standards are supported.

Below is a table comparing the proposed NES to the current Operative Waitaki District Plan and soon to be notified Proposed Waitaki District Plan.

Standards	proposed NES	Operative Waitaki DP	Proposed Waitaki DP
Maximum size	60m2	Nil	80m2
Relationship to principal unit on same site	held in common	held in common*	held in common#
Building coverage	50-70%	40%	40%
Permeable surface	20-30%	Nil	25%
Residential setbacks	0m - 2m front; 0m - 1.5m side/rear	4.5m front; 1.6m side/rear	4.5m front; 1.6m side/rear
Rural setbacks	0m - 8m front; 0m - 3m side/rear	15m - 20m front; 20m side/rear	15m - 20m front; 20m side/rear
Height and recession plane (Residential)	Single storey to meet underlying zone	8m and recession plane	8m and recession plane

*occupied by dependant relatives of the household living in the residential unit

adopts NPS definition of Minor Residential unit

Question Title

22. Are there any additional matters that should be managed by a permitted activity standard?

There needs to be a clear provision around what happens with the MRU when it is no longer required for the purposes intended. As there is no building or resource consent required under the proposed NES, then how do councils monitor that it is still required for the purposes intended? This could result in unintended consequences of them being constructed under the guise of a MRU, but then rented out for non-family members, used for visitor accommodation, etc.

If the proposed NES is enacted, then provisions to address the above issue need to be clear and include avenues for either removing the MRU or requiring resource consent for it to remain and be used for other purposes. This may also include a bond mechanism to ensure compliance.

There is also a concern that nuisance issues associated with dust on rural roads could be exacerbated if setbacks for residential activities are reduced. This could lead to additional compliance resourcing requirements for local councils potentially at the cost of the general ratepayer.

Question Title

23. For developments that do not meet one or more of the permitted activity standards, should a restricted discretionary resource consent be required, or should the existing district plan provisions apply? Are there other ways to manage developments that do not meet the permitted standards?

The existing district plan provisions should apply.

Question Title

24. Do you have any other comments on the resource management system aspects of this proposal?

No further comment.

Notification and funding infrastructure

The proposals in this document would enable a granny flat to be built without needing resource or building consent. Notification of a granny flat is important for local and central government to:

- Provide trusted information for buyers, financiers and insurers
- Track new home construction data and trends
- Value properties for rating purposes
- Plan for infrastructure
- Provide information to support post-occupancy compliance, where required
- Undertake council functions under the Building Act including managing dangerous or insanitary buildings.

Question Title

25. What mechanism should trigger a new granny flat to be notified to the relevant council, if resource and building consents are not required?

A change to the LGA2002 to enable development contributions without building or resource consent and notified under a permitted activity notice or PIM.

Question Title

26. Do you have a preference for either of the options in the table in Appendix 3 and if so, why?

Neither option would provide councils with the power to withhold certificates or approvals, pending payment of a development contributions requirement. Without incentives for developers to pay for development contributions, potentially resulting in non-notifications to local councils of the development of a granny flat.

Question Title

27. Should new granny flats contribute to the cost of council infrastructure like other new houses do?

Yes	No	Not sure/no preference
<u>Yes</u>	No	Not sure/no preference

Please explain your views.

If more than half the households had one or two people based on 2018 census data, and a 60m2 dwelling can easily be a 2-bedroom dwelling (having lived in 2-bedroom units of this size), then the granny flat represents a typical HEU.

If the second dwelling is not required for family members or dependents, these are representing typical HEU dwellings and should contribute to the impacts of growth on infrastructure as is the requirement for payment of development contributions.

Councils cannot afford to lose the contribution to our water, wastewater and roading networks. In an economy where Council's cannot keep up with the increasing costs of infrastructure, not requiring DCs from these new dwellings, would be a cost and a big loss to local Councils.

WDC is of view that it should then be up to the individual TA to determine what amount they levy for a household up to 60m2, as per their individual DC Policy.

Māori land, papakāinga and kaumātua housing

A key issue for Māori wanting to develop housing is the cost and time to consent small, simple houses and other buildings. The proposals in the building and resource management systems may go some way to addressing the regulatory and consenting challenges for developing on Māori land, and for papakāinga and kaumātua housing, where the circumstances of these proposals apply.

Question Title

28. Do you consider that these proposals support Māori housing outcomes?

Yes, I agree	I agree in part	No, I don't agree	Not sure/no preference
Yes, I agree	<u>I agree in part</u>	No, I don't agree	Not sure/no preference
Please explain your views.			

No further comment.

Question Title

29. Are there additional regulatory and consenting barriers to Māori housing outcomes that should be addressed in the proposals?

No comment.

25 July 2025



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Waitaki District Council submission in the matter of resource management freshwater national direction – package 3

Waitaki District Council (WDC) welcomes the opportunity to submit on Package 3 consultation of national resource management direction.

Background

The Waitaki district has a population of ~24,300 (2024) and covers a large land area (7,152 km²) reaching inland from the Waitaki River mouth, up the Waitaki River Valley, through Ōhau to the top of the Ahuriri River Valley, extending south to Ōamaru, and down the east coast beyond Palmerston to Flag Swamp. The Waitaki district is the only Council in the South Island working with two regional Councils - Environment Canterbury and Otago Regional Council.

Summary

Waitaki District Council supports the intent of the proposed national directions in resource management, recognising the need for improved environmental outcomes and greater consistency across New Zealand's planning framework. We acknowledge that national direction can provide valuable clarity and certainty for communities, developers, and council decision-making processes while helping to address significant environmental challenges facing the country.

However, our support is conditional on ensuring that national policies are implemented in a way that recognises local contexts, provides adequate implementation support, and includes realistic timeframes that account for the varying capabilities and resources of different councils across New Zealand.

Key WDC submission points

Freshwater Management (NPS-FM)

Rebalancing objectives

- Support multiple objectives approach to provide flexibility for Waitaki's diverse agricultural and urban communities
- Support realistic timeframes that acknowledge agricultural sector needs, seasonal variations, infrastructure limitations, and economic dependencies

Water storage and security

- Support hybrid approach - national standards for low-risk off-stream storage, regional control of water allocation and environmental limits
- Support enabling both small-scale and large-scale water storage with appropriate risk-based approaches
- Request consideration of community water storage schemes and integration with urban development processes

Wetlands and farming

- Support farming activities pathway with clear conditions for standard operations, seasonal activities, and infrastructure maintenance
- Support removing 2030 wetland mapping requirement due to unfunded compliance costs and resource constraints
- Request clearer permitted activity conditions with simplified language, measurable standards, and practical thresholds

Drinking water protection

- Support Source Water Risk Management Area mapping across New Zealand to identify areas where activities could potentially contaminate the water supply, noting that Environment Canterbury have already done this exercise, and recommend this material informs the development of Regional Spatial plans.

Detailed responses to consultation questions

Please refer to Attachment 1 for our detailed responses to the consultation questions,

Conclusion

Thank you for the opportunity to submit on the Package 3 consultation of national resource management direction – freshwater management.

Yours sincerely



Mayor Gary Kircher
Mayor for Waitaki

Person for Contact: Victoria van der Spek, Policy Lead, Waitaki District Council

Attachment 1: Response to detailed consultation questions – package 3

Package 3: Freshwater

Topic	Consultation question	WDC Feedback	Relief sought
Rebalancing freshwater management through multiple objectives			
	2. Would a rebalanced objective on freshwater management give councils more flexibility to provide for various outcomes that are important to the community? How can the NPS-FM ensure freshwater management objectives match community aspirations?	<p>Yes, multiple objectives would provide flexibility for Waitaki's diverse communities. Our district balances significant agricultural production with small urban centres each with different freshwater priorities.</p> <p>TA rebalanced approach would allow us to:</p> <ul style="list-style-type: none"> • Recognise the importance of irrigation for our agricultural sector • Support appropriate development in our growing towns • Acknowledge that some catchments may have different improvement timeframes based on natural conditions <p>Community engagement should reflect Waitaki's rural-urban mix, ensuring both farming communities and township residents have meaningful input into locally appropriate freshwater management.</p>	
	3. What do you think would be useful in clarifying the timeframes	<p>For Waitaki, realistic timeframes must acknowledge:</p> <ul style="list-style-type: none"> • Our significant agricultural sector requires time to implement system 	<p>Guidance should allow for staged implementation aligned with:</p> <ul style="list-style-type: none"> • Farm planning cycles and capital investment timeframes

Topic	Consultation question	WDC Feedback	Relief sought
	for achieving freshwater outcomes?	<p>changes without threatening farm viability</p> <ul style="list-style-type: none"> Seasonal variations in our climate affect both water availability and quality Infrastructure limitations in smaller communities may require phased improvements The district's economic dependence on primary production needs protection during transition periods 	<ul style="list-style-type: none"> Council's Long Term Plan processes Regional economic development priorities Natural water flow patterns in our catchments
	4. Should there be more emphasis on considering the costs involved, when determining what freshwater outcomes councils and communities want to set? Do you have any examples of costs associated with achieving community aspirations for freshwater?	<p>Yes - Waitaki's ratepayer base and rural economy mean cost impacts are particularly significant:</p> <p>Examples relevant to our district:</p> <ul style="list-style-type: none"> Upgrading smaller township wastewater systems (Kurow, Palmerston) to meet stricter standards Stock exclusion fencing costs across extensive farming operations Economic impacts on dairy conversions and intensive farming that support local employment Monitoring costs spread across a limited ratepayer base in rural areas Infrastructure costs for water storage to support both urban growth and agricultural resilience 	

Topic	Consultation question	WDC Feedback	Relief sought
		Cost transparency is essential for our communities to make informed choices about the pace and extent of improvements, particularly given our district's reliance on productive land use for economic sustainability.	

Topic	Consultation question	WDC Feedback	Relief sought
Rebalancing Te Mana o te Wai			
	5. What will a change in NPS-FM objectives mean for your region and regional plan process?	No comment – regional council issue	
	6: Do you think that Te Mana o te Wai should sit within the NPS-FM's objectives, separate from the NPS-FM's objectives, or outside the NPS-FM altogether – and why?	<p>Te Mana o te Wai should sit within the NPS-FM's objectives but be rebalanced. This approach would:</p> <ul style="list-style-type: none"> • Maintain recognition of te Tiriti obligations and Māori relationships with freshwater, which is important for Waitaki given our relationship with Kāi Tahu • Allow practical implementation that does not paralyse decision-making for our agricultural and urban communities • Provide clear guidance for council staff and the community about how Te Mana o te Wai applies in planning and consenting decisions 	
	7. How will the proposed rebalancing of Te Mana o te Wai affect the variability with which it has been interpreted to date? Will it	<p>The proposed rebalancing should significantly improve consistency across the Waitaki district by:</p> <ul style="list-style-type: none"> • Removing the hierarchy that has led to inconsistent interpretations about 	

Topic	Consultation question	WDC Feedback	Relief sought
	ensure consistent implementation?	<p>whether pristine water quality must be achieved before any other considerations</p> <ul style="list-style-type: none"> • Clarifying that Te Mana o te Wai does not apply to individual consenting decisions, reducing uncertainty for applicants and council processing • Providing clearer guidance on how to balance Te Mana o te Wai with other legitimate community interests <p>Current variability has created challenges for our farming community and developers who face different interpretations between councils and even within our own processes. The proposed changes should:</p> <ul style="list-style-type: none"> • Reduce compliance costs through more predictable processes • Enable our planning team to provide clearer guidance to applicants • Support more consistent regional approaches that benefit cross-boundary issues like the Waitaki River <p>However, success will depend on the final wording being sufficiently clear to prevent new interpretation dispute while maintaining meaningful recognition of Māori freshwater values.</p>	

Topic	Consultation question	WDC Feedback	Relief sought
Providing flexibility in the National Objectives Framework			
	8. Which values, if any, should be compulsory? Why?	No comment	
	9. What would be the practical effect of removing compulsory national values? Do you think this will make regional processes easier or harder?	No comment	
	10. Which attributes, if any, should be compulsory to manage? Which should be optional to manage?	No comment	
	11. Which attributes, if any, should have national bottom lines? Why?	No comment	
	12. To what extent should action plans be relied upon, including to	No comment	

Topic	Consultation question	WDC Feedback	Relief sought
	achieve targets for attributes?		
	13. Should councils have flexibility to deviate from the default national thresholds (including bottom lines) and methods? Are there any other purposes which should be included?	No comment	
Enabling commercial vegetable growing			
	14. What are the pros and cons of making commercial vegetable production a permitted activity?	WDC sees little to no need for this as it is already permitted under the Waitaki District Plan.	
	15. How do you think policies and/or rules should be designed to provide for crop rotation? Do you think these should be considered within sub-catchments only?	WDC sees little to no need for this as it is already permitted under the Waitaki District Plan.	

Topic	Consultation question	WDC Feedback	Relief sought
	16. For the proposal to develop nationally set standards, what conditions should be included?	Not needed given comments above.	

Topic	Consultation question	WDC Feedback	Relief sought
Addressing water security and water storage			
	17. Should rules for water security and water storage be set nationally or regionally?	<p>We recommend a hybrid approach best serves Waitaki's needs:</p> <p>National level should set:</p> <ul style="list-style-type: none"> • Basic permitted activity standards for low-risk off-stream storage (like the draft standards) • Consistent technical requirements for dam safety and construction • Framework objectives for water security and climate resilience <p>Regional level should retain:</p> <ul style="list-style-type: none"> • Water allocation and take consent requirements • Catchment-specific environmental limits • Location-specific restrictions based on local ecological or cultural values <p>This reflects Waitaki's situation where:</p> <ul style="list-style-type: none"> • Climate variability makes water storage critical for both urban growth and agricultural resilience • Our regional water allocation framework already provides regional oversight of takes and environmental flows 	

Topic	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none"> Local conditions vary significantly across our district from coastal to inland areas National standards would reduce consent costs and timeframes for routine farm water storage 	
	18. Are there any other options we should consider? What are they, and why should we consider them?	<p>Community water storage schemes:</p> <ul style="list-style-type: none"> Enable joint storage projects serving multiple properties or small townships Particularly relevant for our smaller communities facing water security challenges Could reduce individual compliance costs while building resilience <p>Integration with urban development:</p> <ul style="list-style-type: none"> Link water storage requirements to subdivision and development consent processes Support Oamaru's growth while ensuring water security Enable stormwater detention to serve dual purposes <p>Seasonal flexibility:</p> <ul style="list-style-type: none"> Allow temporary storage structures during drought conditions 	

Topic	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none"> • Recognise that water security needs vary with climate cycles • Enable adaptive management for our variable rainfall patterns <p>Existing infrastructure recognition:</p> <ul style="list-style-type: none"> • Streamlined rules for upgrading or expanding existing farm dams • Acknowledge that many Waitaki properties already have established water storage 	
	19. What are your views on the draft standards for off-stream water storage set out in Appendix 2: Draft standards for off-stream water storage? Should other standards be included? Should some standards be excluded?	<p>Other things to consider:</p> <ul style="list-style-type: none"> • Flexible setback distances based on storage size and risk level • Natural hazards consideration - account for earthquake and flooding risks 	
	20. Should both small-scale and large-scale water storage be enabled through new standards?	Yes, both scales should be enabled but with varied approaches: This approach recognises:	

Topic	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none">• Economic efficiency - Waitaki's economy depends on both small and large farming operations having water security• Climate adaptation - varying scales of storage needed for different drought resilience strategies• Infrastructure development - larger storage may serve multiple users or provide community benefits	

Topic	Consultation question	WDC Feedback	Relief sought
Simplifying the wetlands provisions			
	21. What else is needed to support farmers and others to do things that benefit the environment or improve water quality?	<p>From Waitaki's perspective, farmers need:</p> <ul style="list-style-type: none"> • Financial support mechanisms - grants or rates relief for environmental improvements, particularly for smaller farming operations that are economically vital to our rural communities • Technical assistance - simplified guidance and on-farm advisory services that account for our district's diverse farming systems (extensive sheep, dairy, cropping) • Streamlined consenting - clearer pathways for environmental enhancement projects like wetland creation, riparian planting, and water storage that currently face regulatory barriers • Recognition of good practice - acknowledge that many farmers are already implementing best practice and build on this rather than imposing blanket restrictions • Integrated planning - coordinate environmental requirements with other council processes (building, subdivision) to reduce compliance burden 	

Topic	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none"> Local solutions - enable community-led catchment initiatives that reflect our district's farming patterns and environmental conditions 	
	22. What should a farming activities pathway include? Is a farming activities pathway likely to be more efficient and/or effective at enabling activities in and around wetlands?	<ul style="list-style-type: none"> Standard farming operations - fencing, stock watering, irrigation infrastructure, maintenance of existing tracks and yards Seasonal activities - winter grazing rotations, fodder crop establishment, stock movement between paddocks Infrastructure maintenance - culvert cleaning, drain maintenance, track repairs Clear conditions - simple, measurable standards rather than subjective assessments Notification process - streamlined reporting that does not require costly professional assessments <p>Yes, this would be more efficient for Waitaki because:</p> <ul style="list-style-type: none"> Our farming community would have regulatory certainty for routine operations Council resources could focus on higher-risk activities rather than processing standard farming consents Reduced compliance costs would support farm viability in our rural economy 	

Topic	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none"> Faster approvals would enable timely seasonal operations critical for farming success 	
	23. What will be the impact of removing the requirement to map wetlands by 2030?	<p>Positive impacts:</p> <ul style="list-style-type: none"> Reduce significant unfunded compliance costs that would add strain to our rates base Eliminate resource constraints - we lack specialist ecological staff for comprehensive mapping Remove uncertainty for farmers about which areas might be classified as wetlands Allow focus on protecting genuinely significant wetlands rather than comprehensive coverage <p>Potential concerns:</p> <ul style="list-style-type: none"> Less certainty for landowners going forward and potential compliance issues. May shift identification burden to individual consent processes, potentially increasing costs for applicants Could complicate enforcement and compliance monitoring 	

Topic	Consultation question	WDC Feedback	Relief sought
		<p>Preferred approach:</p> <ul style="list-style-type: none"> Prioritised mapping of regionally significant wetlands with clear guidance for identifying wetlands during consent processes, supported by central government technical and financial assistance. 	
	<p>24. Could the current permitted activity conditions in the NES-F be made clearer or more workable?</p>	<p>Yes, from a council administration and farming community perspective, improvements needed include:</p> <ul style="list-style-type: none"> Simplified language - replace technical jargon with plain English that an easily be understood Measurable standards - provide specific distances, areas, and quantities rather than subjective terms like "minor" or "temporary" Practical thresholds - set realistic limits that account for normal farming variations and seasonal conditions Clear exceptions - specify when activities are exempt (emergency repairs, stock welfare, existing infrastructure) Visual aids - provide diagrams and examples showing compliance requirements 	

Topic	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none">Integrated conditions - coordinate NES-F requirements with other regulations to reduce duplication	

Topic	Consultation question	WDC Feedback	Relief sought
Simplifying the fish passage regulations			
	25. What information requirements are necessary for fish passage? What would the difference in cost be, relative to current information requirements?	No comment – regional council issue	
	26. How can regulations for temporary and permanent culverts in the NES-F be made simpler?	No comment – regional council issue	
	27. Temporary culverts are currently treated the same as permanent ones. If temporary culverts were to be treated differently (eg, had fewer conditions), would it be better to do so through a permitted activity pathway in the NES-F (culverts only), or by allowing councils to be	No comment – regional council issue	

Topic	Consultation question	WDC Feedback	Relief sought
	less stringent than the permitted activity conditions for culverts and weirs?		
	28. Have you encountered similar issues with any other policy or regulation within the NPS-FM or NES-F (eg, rules or gateway tests about river reclamation)?	No comment – regional council issue	
Addressing remaining issues with farmer-facing regulations			
	29. To what extent will it be more efficient to require dairy farmers to report on fertiliser use at the same time of year they report on other matters?	N/A	
	30. Has the requirement for dairy farms to report their use of fertiliser already served its purpose, in terms of having signalled a level of	N/A	

Topic	Consultation question	WDC Feedback	Relief sought
	unacceptable use that should be avoided – no more than 190 kilograms per hectare per year – and if so, is this requirement still necessary?		

Topic	Consultation question	WDC Feedback	Relief sought
Including mapping requirements for drinking water sources			
	31. Do you think that requiring regional councils to map SWRMAs for applicable drinking water supplies in their regions will improve drinking water safety? Should councils be required to publish SWRMAs?	<p>Yes, potentially. We note that Environment Canterbury already identifies similar material.</p> <p>Benefits for our district:</p> <ul style="list-style-type: none"> • Proactive protection - prevents contamination rather than reactive treatment, which is more cost-effective for smaller supplies • Regulatory clarity - provides certainty for both council and landowners about where drinking water protection rules apply • Risk management - helps prioritise limited council resources on highest-risk areas around our water takes <p>Publishing SWRMAs is essential because:</p> <ul style="list-style-type: none"> • Transparency enables landowners to understand their obligations and plan accordingly • Public availability supports our consent processing and compliance functions • Assists emergency response planning and contamination incident management 	

Topic	Consultation question	WDC Feedback	Relief sought
		<ul style="list-style-type: none"> Enables integration with other council planning processes (district planning, emergency management) <p>Mapping should be funded by central government given the national benefit and the burden on regional councils' ratepayers.</p>	
	32. Do you think that three zones should be required for each SWRMA, or is one zone sufficient?	<p>We note Environment Canterbury has a similar system already.</p> <p>Three zones are appropriate for Waitaki's water supplies because:</p> <ul style="list-style-type: none"> Zone 1 (immediate) - Critical for our smaller surface water takes where contamination could have immediate impact Zone 2 (microbial) - Important for rural supplies where septic systems and agricultural activities pose bacterial risks Zone 3 (catchment-wide) - Essential for our longer-term protection, particularly given intensive agriculture in some catchments <p>Our district's mix of surface and groundwater sources, combined with varying levels of</p>	

Topic	Consultation question	WDC Feedback	Relief sought
		treatment, means differentiated protection is needed. Single-zone approaches would either be too restrictive for large catchment areas or insufficient for immediate source protection. The three-zone approach also aligns with different levels of activity controls - more restrictive near the source, graduated controls in the wider catchment.	
	33. What do you think the population threshold should be to require regional councils to map SWRMAs (eg, 100-person, 500-person, or some other threshold)?	That would be a useful guidance	

25 July 2025



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Waitaki District Council submission in the matter of resource management Going for Housing Growth national direction – package 4

Waitaki District Council (WDC) welcomes the opportunity to submit on Package 4 consultation of national resource management direction.

Background

The Waitaki district has a population of ~24,300 (2024) and covers a large land area (7,152 km²) reaching inland from the Waitaki River mouth, up the Waitaki River Valley, through Ōhau to the top of the Ahuriri River Valley, extending south to Ōamaru, and down the east coast beyond Palmerston to Flag Swamp. The Waitaki district is the only Council in the South Island working with two regional Councils - Environment Canterbury and Otago Regional Council.

Summary

Waitaki District Council supports the intent of the proposed national directions in resource management, recognising the need for improved environmental outcomes and greater consistency across New Zealand's planning framework. We acknowledge that national direction can provide valuable clarity and certainty for communities, developers, and council decision-making processes while helping to address significant environmental challenges facing the country.

However, our support is conditional on ensuring that national policies are implemented in a way that recognises local contexts, provides adequate implementation support, and includes realistic timeframes that account for the varying capabilities and resources of different councils across New Zealand.

Key WDC submission points

1. Going for Housing Growth Package

Housing growth targets - request for tiered approach

- The proposed 30-year capacity requirement is excessive for smaller councils with limited development pressure and may lead to over-zoning and inefficient land use
- High growth projections based on metropolitan assumptions do not reflect realistic demand patterns in rural/provincial areas like Waitaki
- Infrastructure costs for immediately enabling all theoretical capacity would be prohibitive for smaller councils with limited rating bases and infrastructure capacity constraints in the shorter term

Rural-urban boundaries

- Rural and provincial communities often have strong preferences for managing urban form that reflect local values and economic priorities
- Unlimited urban expansion creates significant infrastructure servicing challenges for smaller councils with limited cross-subsidisation capacity
- Complete prohibition conflicts with sustainable land use planning principles and may undermine productive primary sector activities

Regional spatial planning

- Regional planning processes must recognise that rural districts have different growth patterns, infrastructure constraints, and economic drivers than urban areas
- Mandatory participation in 50-year regional spatial planning must include meaningful consultation with rural and provincial communities whose needs differ from urban centres
- WDC requires assurance that regional spatial planning will not override legitimate local planning decisions that reflect community preferences and local circumstances

Standardised zones - flexibility for rural contexts

- While WDC supports reducing complexity through standardised zones, mandatory zones must be flexible enough to work effectively in diverse rural and provincial contexts
- Rural districts have different land use patterns, development scales, and community expectations than urban areas
- The "externalities-only" regulation approach may not adequately address rural land use conflicts and community amenity concerns
- Limited ability to customise zoning locally may result in inappropriate development outcomes that conflict with rural character and productive land uses

Infrastructure and funding

- Strong support for enhanced funding mechanisms
- Smaller communities face significantly higher per-capita infrastructure costs with limited ability to cross-subsidise between developments
- Current funding mechanisms are inadequate for enabling housing growth in rural provincial areas where development margins are lower and costs are higher
- Rural councils have less technical capacity and resources for complex infrastructure planning and delivery
- Growth requirements must be matched with realistic funding solutions that recognise provincial economic constraints

Council capacity and implementation

- The transition to new systems requires substantial capacity building, training, and potentially shared services arrangements
- Implementation timeframes must recognise the time needed for smaller councils to develop necessary capabilities

Community engagement - maintain democratic input

- Concern about reduced local democracy
- Rural and provincial communities typically have strong, well-informed views about urban form and development that reflect local values and economic priorities
- Reduced ability for local democratic input in planning decisions undermines community engagement and may result in developments that conflict with community preferences
- The shift towards national standardisation reduces opportunities for communities to influence their local development patterns
- Meaningful community engagement is essential for successful planning outcomes and social licence for development

Detailed responses to consultation questions

Please refer to Attachment 1 for our detailed responses to the consultation questions.

Conclusion

Thank you for the opportunity to submit on the Package 4 consultation of national resource management direction – going for housing growth.

Yours sincerely



Mayor Gary Kircher
Mayor for Waitaki

Person for Contact: Victoria van der Spek, Policy Lead, Waitaki District Council

Attachment 1: Response to detailed consultation questions – package 4

Package 4: Going for Housing growth

Discussion topic	Consultation question	WDC feedback	Relief sought
	1. What does the new resource management system need to do to enable good housing and urban development outcomes?	Mandatory bulk and location control builds and levy disincentives as a mechanism to land banking / holding land without developing it for housing to allow for the timely release of land for urban development. This may also include maximum residential lot sizes to both ensure better utilisation of zoned land unless there are identified constraints, e.g. hazards and so there is no expectation that land banking will provide a greater likelihood of the acceptance of a greater level of intensification given pent up demand pressure over time. Also, provision for the removal of potential restrictive covenants so as not to restrict intensification.	Maintain local community input in planning decisions while providing clear national direction Provide flexibility to implement solutions appropriate to Council's local context and growth patterns Ensure infrastructure funding mechanisms support smaller communities where economies of scale are limited Include transition support and capacity building for smaller councils implementing new systems
Future development strategies and spatial planning	2. How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?	In particular, with post settlement governance entities (PSGEs), iwi/Māori and developers. Ensure that there is an infrastructure prerequisite so that development is able to be coordinated and not leap-frog development ready areas. Use of deferred zoning and development/financial contributions can help manage this. Additional infrastructure funding streams are required to	Improved stakeholder involvement to inform preparation

Discussion topic	Consultation question	WDC feedback	Relief sought
		break away from the infrastructure dependency approach. Unless this is resolved, Councils will continue to limit the pace through their spending plans.	
Housing growth targets	3. Do you support the proposed high-level design of the housing growth targets? Why or why not?	<p>WDC supports the intent to increase housing supply but has concerns about:</p> <ul style="list-style-type: none"> • The 30-year capacity requirement may be excessive for smaller councils with limited development pressure • High growth projections may not reflect realistic demand in rural/provincial areas – Waitaki typically uses a medium growth scenario for its growth planning • The 20% contingency margin could lead to over-zoning and inefficient land use (and unnecessary potential costs such as infrastructure/vandalism and an area that is often subject to anti-social behaviour prior to a lengthy period of development) as well as increased infrastructure budgets/costs to provide for servicing that may be unrealised. • Infrastructure costs for enabling all capacity immediately could be prohibitive for smaller councils 	<p>Consider tiered targets based on actual growth pressures and council capacity</p> <p>Allow flexibility in infrastructure staging for smaller councils</p> <p>Provide central government support for infrastructure costs in provincial areas</p> <p>Out-of-sequence development costs associated with infrastructure provision to be funded by the developer and may include development/financial contributions.</p>
Providing an agile land release mechanism	4. How can the new resource management system better enable a streamlined release of land previously identified	Use of deferred zoning mechanisms that hinge on infrastructure availability/provision, and if needed to be accelerated, this can be done at the developer's cost, but potential for claw back	

Discussion topic	Consultation question	WDC feedback	Relief sought
	as suitable for urban development or a greater intensity of development?	provisions to enable others that benefit from this to contribute to the developer's cost over a specified time period, e.g. 10 years.	
Determining housing growth targets	5. Do you agree with the proposed methodology for how housing growth targets are calculated and applied across councils?	Partial support <ul style="list-style-type: none"> SA2 projections may not capture local market dynamics in smaller urban areas 	Councils should retain some discretion to use alternative projections where justified by local evidence
	6. Are there other methods that might be more appropriate for determining Housing Growth Targets?	N/A for Waitaki	
Calculating development capacity	7. How should feasibility be defined in the new system?	Feasibility should be based on: <ul style="list-style-type: none"> Current market conditions with allowance for reasonable cost/price adjustments over time. Land prices should be used instead of house prices as building costs are influenced by other factors and often include other uncontrolled matters, such as higher standard of house fitout, type of house (e.g. single v two storey, etc). Recognition of infrastructure staging requirements Local market characteristics (not just metropolitan assumptions), which can be 	Clear, standardised methodology to ensure consistency Adjustments should be capped to prevent over-optimistic projections.

Discussion topic	Consultation question	WDC feedback	Relief sought
		influenced by factors such as popular school zones.	
	8. If the design of feasibility is based on profitability, should feasibility modelling be able to allow for changing costs or prices or both?	Yes, with some parameters Feasibility modelling should allow adjustments for: <ul style="list-style-type: none"> • Reasonable infrastructure cost variations over time • Market land price changes based on documented trends • Construction cost escalation over medium-term timeframes, but standardised measurement of this nationally if it is going to be used as a proxy measure. 	
	9. Do you agree with the proposal to replace the current 'reasonably expected to be realised' test with a higher-level requirement for capacity to be 'realistic'?	Yes	
	10. What aspects of capacity assessments would benefit from greater prescription and consistency?	Development capacity measures for vacant land as well as how existing housing demand and supply (i.e. real estate market) is factored into overall capacity assessments. Potential measurement of vacant house ownership (e.g. holiday homes, AirBnBs) may also be useful as this can have a marked effect on small settlements	

Discussion topic	Consultation question	WDC feedback	Relief sought
		with a higher proportion of these, in turn increasing demand but not actually contributing to supply for residents.	
Infrastructure requirements	11. Should councils be able to use the growth projection they consider to be most likely for assessing whether there is sufficient infrastructure-ready capacity?	Yes, strongly support This approach is essential for: <ul style="list-style-type: none"> • Realistic infrastructure planning and investment • Avoiding over-investment in uncertain growth scenarios • Aligning with Long Term Plan processes • Managing ratepayer expectations and costs 	
	12. How can we balance the need to set minimum levels of quality for demonstrating infrastructure capacity with the flexibility required to ensure they are implementable by all applicable councils?		Central Government standardisation guidance is required for different Tier councils.
	13. What level of detail should be required when assessing whether capacity is infrastructure-ready? For instance, should this be limited to plant equipment (e.g. treatment plants,	All aspects of the infrastructure need to be ready, however there could be the ability to stage development as capacity ramps up.	

Discussion topic	Consultation question	WDC feedback	Relief sought
	pumping stations) and trunk mains/key roads, or should it also include local pipes and roads?		
Responding to price efficiency indicators	14. Do you agree with the proposed requirement for council planning decisions to be responsive to price efficiency indicators?	Not necessarily as there are many other factors that influence price beyond supply and demand. If price-cost ratios are to be used, they could be limited to land price only so that other housing cost factors are excluded that often are unrelated to actual supply costs.	
Business land requirements	15. Do you agree that councils should be required to provide enough development capacity for business land to meet 30 years of demand?	Yes, correlation with business capacity zoning for job creation purposes should allow for council discretion but with conditions, such as: <ul style="list-style-type: none"> • Smaller councils should have flexibility in methodology given limited data availability • Recognition that business land demand patterns differ significantly between rural/provincial and metropolitan areas • Support needed for demand forecasting in smaller communities • Alignment with regional economic development strategies • Out of zone larger scale business land needs (e.g. rural processing facility) may need to be excluded as these are more site specific 	

Discussion topic	Consultation question	WDC feedback	Relief sought
Responsive planning	16. Are mechanisms needed in the new resource management system to ensure councils are responsive to unanticipated or out-of-sequence developments? If so, how should these be designed?	Yes, potentially deferred zoning that allows for developer funding and provision of infrastructure that is needed to unlock the deferred zoned land.	
	17. How should any responsiveness requirements in the new system incorporate the direction for 'growth to pay for growth'?	See above and potentially with claw back provisions to enable others that benefit from this to contribute to the developer's cost over a specified time period, e.g. 10 years. There is already the precedent of co-operation between developers and infrastructure sharing albeit within a shorter time scale.	
Rural-urban boundaries	18. Do you agree with the proposal that the new resource management system is clear that councils are not able to include a policy, objective or rule that sets an urban limit or a rural-urban boundary line in their planning documents for the purposes of urban containment? If not, how should the system best give	Waitaki has significant concerns with this proposal <ul style="list-style-type: none"> • In rural/provincial areas, boundaries often protect highly productive agricultural land • Local communities may have strong preferences for managing urban form including structure plan development that has already occurred due to qualifying matters. • Unlimited urban expansion could create infrastructure servicing challenges 	<ul style="list-style-type: none"> • Allow flexibility for councils to demonstrate need for boundaries based on local circumstances • Allow for soft boundaries, such as rural residential zoning, particularly where there are infrastructure constraints. • Require robust justification and regular review of any boundaries

Discussion topic	Consultation question	WDC feedback	Relief sought
	effect to Cabinet direction to not have rural-urban boundary lines in plans?	<ul style="list-style-type: none"> May conflict with sustainable land use planning principles as well as being able to manage reverse sensitivity issues 	Focus on removing unnecessary constraints while protecting genuinely important rural land
Intensification - Key public transport corridors	19. Do you agree that the future resource management system should prohibit any provisions in spatial or regulatory plans that would prevent leapfrogging? If not, why not?	Yes	
	20. What role could spatial planning play in better enabling urban expansion?	To help direct where future urban development can be established, particularly for new towns for the benefit of planning across regions.	
	21. Do you agree with the proposed definitions for the two categories of 'key public transport corridors'? If not, why not?	N/A for Waitaki	
	22. Do you agree with the intensification provisions applying to each category? If not, what should the requirements be?	N/A for Waitaki	

Discussion topic	Consultation question	WDC feedback	Relief sought
	23. Do you agree with councils being responsible for determining which corridors meet the definition of each of these categories?	N/A for Waitaki	
Intensification catchments sizes	24. Do you support Option 1, Option 2 or something else? Why?	Option 1 is more realistic as better captures mobility impaired/reduced and age demographics that may not be able to travel as far.	
Minimum building heights to be enable	25. What are the key barriers to the delivery of four-to-six storey developments at present?	N/A for Waitaki	
	26. For areas where councils are currently required to enable at least six storeys, should this be increased to more than six storeys? If so, what should it be increased to? Would this have a material impact on what is built?	N/A for Waitaki	
	27. For areas where councils are currently required to enable at least six storeys, what would be the costs and	N/A for Waitaki	

Discussion topic	Consultation question	WDC feedback	Relief sought
	risks (if any) of requiring councils to enable more than six storeys?		
Offsetting the loss of development capacity	28. Is offsetting for the loss of capacity in directed intensification areas required in the new resource management system?	No (What about TDR's where height / bulk incentives are sold by heritage buildings in central Auckland Council such as churches and the money then used to do these up or for conservation plans. The Anglican Church is against the removal of this for example)	
	29. If offsetting is required, how should an equivalent area be determined?	This would prove to be difficult and councils may not be able to identify the required area within the land value threshold.	
Intensification in other areas	30. Is an equivalent to the NPS-UD's policy 3(d) (as originally scoped) needed in the new resource management system? If so, are any changes needed to the policy to make it easier to implement?	N/A for Waitaki	
Enabling a mix of uses across urban environments	31. What controls need to be put in place to allow residential, commercial and community activities to take	ANZSIC 2006 compatibility development. The Operative and Proposed Waitaki District Plans contained mixed use provisions for settlements/townships that can be used as an	

Discussion topic	Consultation question	WDC feedback	Relief sought
	place in proximity to each other without significant negative externalities?	example of controls that can be put in place to provide for this.	
	32. What areas should be required to use zones that enable a wide mix of uses?	Those in proximity to existing commercial and industrial areas and for smaller settlements that have limited non-residential activities spread throughout.	
Minimum floor area and balcony requirements	33. Which rules under the current system do you consider would either not meet the definition of an externality or have a disproportionate impact on development feasibility?	Potentially requirements for outdoor living space and minimum buildable area dimensions. These are set to ensure a basic level of internal amenity to enable people to provide for their well-being and their health and safety (s5 matter), so will need a strong evidence base to take these out. Experience in then Auckland City (shoe-box apartments) resulted in minimum sizes as banks would not provide loans on anything less than 40m ² in addition to falls in living standards.	
Targeting of proposals	34. Do you consider changes should be made to the current approach on how requirements are targeted? If so, what changes do you consider should be made?	Yes, the current tiered approach needs refinement.	Create a more nuanced classification system that considers council capacity, not just population Provide targeted support for some Tier 3 councils who may have specific growth pressures

Discussion topic	Consultation question	WDC feedback	Relief sought
			<p>Establish Tier 4 category for very small urban centres with minimal requirements</p> <p>Provide additional support and resources for smaller councils to implement new requirements</p> <p>Consider regional groupings for shared services and expertise</p> <p>Provide transition periods for smaller councils to build technical capacity</p>
Impacts of proposals on Māori	35. Do you have any feedback on how the Going for Housing Growth proposals could impact on Māori?	No	
Other matters	36. Do you have any other feedback on Going for Housing Growth proposals and how they should be reflected in the new resource management system?	No	

Discussion topic	Consultation question	WDC feedback	Relief sought
Transitioning to Phase Three	37. Should Tier 1 and 2 councils be required to prepare or review their HBA and FDS in accordance with current NPS-UD requirements ahead of 2027 long-term plans? Why or why not?	<p>As a Tier 3 council, this does not directly apply to Waitaki. However, we support suspending these requirements to allow councils to focus resources on transitioning to the new system. This would:</p> <ul style="list-style-type: none"> • Avoid duplicate work and costs • Allow councils to concentrate on Phase Three implementation • Provide more time for proper system design and training 	

7.6 DEVELOPMENT CONTRIBUTIONS DECISIONS MADE UNDER DELEGATED AUTHORITY

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Authoriser: Joanne O'Neill, Director Strategy, Performance, and Design

RECOMMENDATION

That Council receives and notes the information.

PURPOSE

The purpose of this report is to inform Council of the decisions made by the Development Contributions Subcommittee under delegated authority.

SUMMARY

The Development Contributions Subcommittee has made two decisions on requests for reconsideration of development contributions under delegated authority since September 2024.

Under delegated authority, the Development Contributions Subcommittee has made four recommendations to Council, and Council has made four decisions on requests for reconsideration of Development Contributions since September 2024. These matters were discussed and decided by Council in Public Excluded sessions of Council Meetings.

A summary of the key aspects of those decisions is provided below.

DISCUSSION

The Development Contributions Subcommittee has the power to act to reduce, waive or defer development contributions on any one development up to the amount of \$40,000 excluding GST, and the power to recommend to Council to reduce, waive, or defer development contributions in excess of \$40,000 excluding GST.

Officers have the authority to decide on a request for waiver, review or deferral of development contributions if the sum involved is less than \$5,000 excluding GST.

There have been four decisions made by Council, and two decisions made by the Development Contributions Committee under delegated authority since last reported to Council through the Council Activity Update in September 2024.

The summary of key aspects of those decisions is provided for Council's information.

SUMMARY OF DECISIONS MADE UNDER DELEGATED AUTHORITY

There have been four recommendations to Council made under the delegated authority of the Development Contributions Committee since the last report to Council in the September 2024 Council Activity Update.

Property Address	Date	Decision Requested	Decision Made
Kenilworth Road, Oamaru	July 2025	Defer payment of development contributions and financial contributions.	Deferred to allow payment on the settlement of sale of each lot, with the balance due in 24 months.
Taward Street, Oamaru	Feb 2025	Reconsider development contributions.	Special assessment reduced the level of development contributions required.
Sussex Street, Weston	Oct 2024	Defer payment of water and wastewater development contributions and financial contributions.	Delegated decision to DC Subcommittee.
Pinot Noir Court, Omarama	Sept 2024	Defer payment of development and financial contributions.	Deferred to allow payment on the settlement of sale of each lot, with the balance due in 24 months.

There have been 2 decisions made under the delegated authority of the Development Contributions Committee and confirmed since the last report to Council in the September 2024 Council Activity Update.

Property Address	Date	Decision Requested	Decision Made
Fiveforks	May 2025	Waive water development contributions.	Waived water development contributions as the activity was excluded from “commercial activity” under the Policy.
Sussex Street, Weston	Feb 2025	Defer payment of water and wastewater development contributions and financial contributions.	Deferred to allow payment over 24 months with balance to be paid on sale of the 4 th lot if sold prior to 24 months.

8 RESOLUTION TO EXCLUDE THE PUBLIC

RECOMMENDATION

That the public be excluded from the following parts of the proceedings of this meeting.

The general subject matter of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and the specific grounds under section 48 of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:

General subject of each matter to be considered	Reason for passing this resolution in relation to each matter	Ground(s) under section 48 for the passing of this resolution
9.1 - Buzan Road Quarry Lease - Seeking Council Direction	s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information s7(2)(h) - the withholding of the information is necessary to enable Council to carry out, without prejudice or disadvantage, commercial activities	s48(1)(a)(i) - the public conduct of the relevant part of the proceedings of the meeting would be likely to result in the disclosure of information for which good reason for withholding would exist under section 6 or section 7
9.2 - 2025 Council Controlled Organisation Directorships	s7(2)(a) - the withholding of the information is necessary to protect the privacy of natural persons, including that of deceased natural persons	s48(1)(a)(i) - the public conduct of the relevant part of the proceedings of the meeting would be likely to result in the disclosure of information for which good reason for withholding would exist under section 6 or section 7
9.3 - Public Excluded minutes of the Council Meeting held on 29 July 2025	s7(2)(h) - the withholding of the information is necessary to enable Council to carry out, without prejudice or disadvantage, commercial activities	s48(1)(a)(i) - the public conduct of the relevant part of the proceedings of the meeting would be likely to result in the disclosure of information for which good reason for withholding would exist under section 6 or section 7

9 PUBLIC EXCLUDED SECTION

10 RESOLUTION TO RETURN TO THE PUBLIC MEETING

RECOMMENDATION

That Council resumes in open meeting and decisions made in public excluded session are confirmed and made public as and when required and considered.

11 RELEASE OF PUBLIC EXCLUDED INFORMATION

12 MEETING CLOSE