# Revenue & Financing Policy – Summary of Feedback

To support hearings and deliberation on 18 and 19 August

## Contents

	Summary of all feedback received	3
1.	Stockwater	5
2.	Solid Waste Collection	25
3.	Elderly Persons Housing	29
4.	Wastewater	32
5.	Boundary changes – Lake Hood and changes to Water Supply and Wastewater	33
6.	EANC	34
7.	How rates are charged	35
8.	General	37

# Summary of all feedback received

- 134 submissions received on time, 1 late submission
- 28 submitters to be heard

#### Which option do you support for Elderly Persons Housing?

	%	Number of responses
<b>Option One –</b> Increase rent significantly to meet upgrade requirements (status quo)	14%	6
<b>Option Two –</b> Introduce a general rate component of 0-30% and increase rent by around \$10 per week (preferred option)	31%	13
Neither of these	55%	23
	Total	42

#### Which option do you support for Stockwater Management?

	%	Number of responses
<b>Option One –</b> Set a minimum charge and a per metre rate (status quo)	50%	53
<b>Option Two –</b> Fixed cost of \$600 per property and a per metre rate (preferred option)	8%	8
<b>Option Three</b> – Equal charge per property of around \$700	4%	4
None of these	38%	40
	Total	105

## Which option do you support for Wastewater?

	%	Number of responses
<b>Option One –</b> Charge based on property location (status quo)	47%	18
<b>Option Two –</b> Equal charge per property (around \$420) (preferred option)	24%	9
Neither of these	29%	11
	Total	38

#### Solid Waste Collection (extending the service to these areas)

Collection area	No. of properties affected	Supports	Does not support	Total submissions received on topic
Willowby Block	120	3	12	15
Rakaia - Acton Road	6	-	1	1
Laing's Road	4	-		
Melrose Road	3			
Chertsey – Wilkinson's Road	9	No submissions from residents of these areas on the proposed extensions		
Methven – Thyme Stream	16			
Lake Hood - Village Green	4			

#### 1. Stockwater

Council consulted on increasing the minimum charge for stockwater to be \$600, plus \$0.1665 per metre over 1,000 metres. There would be no charge for 'stockwater services'.

Submitter Name	Page number	Summary	Staff comments
Applegarth Holdings Limited (Lucy and Simon Raisbeck)	12	In the six months since residing at their property there has been no water in race, therefore is too unreliable for stock. Questions why they are being charged for stockwater when it is not reliable and there is no ability to control a natural spring. Suggestion at a Zoom meeting was that these races could be reclassified as a 'spring drain' and therefore exempt from the charging system. Submitter requests reclassification of the race and that the particular charges for the race are cancelled immediately.	The water races bylaw currently only distinguishes between <b>local</b> races and <b>main</b> races. They are currently treated the same way in terms of rating. While, the creation of additional classifications of races with lower or zero rating liabilities may be feasible, it may result in increased complexity, and ultimately impose further costs on remaining customers <i>A Guthrie</i>
Baker, Jody <u>(late submission)</u>	242	Opposed to paying anything for stockwater as there is no water running through property. Would prefer the race was filled in. Not maintained and questions why they pay for a service that is not used.	Noted.
Baldwin, William HEARD	15	Has 20m of race travelling through property. Requests an exemption from the SW rate for smaller properties.	There may be merit in providing a rating exemption for properties where there is a very small length of race running through the property. If Council was to progress this concept Council may consider that properties receiving such an exemption should not be considered "affected parties" during race closure processes pertaining to the exempted race <i>A Guthrie</i>
Ball, Michael and Bennett, Andre	19	Would support a small increase to minimum charge, however not the extent that was proposed. The creek which cuts property is used as a drain for town so no option to have this closed. Water in race is not used but submitter acknowledges ability to use it and does not object to paying. However, does spend a lot of time removing rubbish and	It is noted that races that provide for other values/benefits may be more difficult to close. – <i>A Guthrie</i>

Submitter Name	Page number	Summary	Staff comments
		upkeep. Proposal would increase rates bill by over 30% for no additional benefit.	
Bennett, Robert	29	States SW races a thing of the past with many paying for a service they don't use. Council should take a lead in saving water and shut the races.	Council is endeavouring to facilitate the closures of races, where closure is considered appropriate, but recognising that the network provides for other values beyond just stockwater provision. – A Guthrie
Bruce, Roger HEARD	34	Increasing the minimum charge would be crazy given urban residents pay half this amount for guaranteed supply of quality water. Closing races to increase flows in the river will not work.	The property densities associated with urban water schemes typically provide for relatively lower cost services. The proposed minimum charge is comparable to services provided by district irrigation schemes. The comment regarding the impact of closures on river flows is a matter for Environment Canterbury. – A <i>Guthrie</i>
Burrows Farms Limited (William Burrows)	38	States that the aim of Option 2 is to increase cost for smaller farms, however where many properties are owned by the same operator with a moderate race length the cost actually increases greatly overall. This has the opposite effect of what is outlined. Submitter is a large land owner but would not benefit from the proposed change given they own 8 properties.	The submitter may not be applying the per metre rate component correctly as it only comes into effect for lengths of race greater than 1,000m. Based on the 2018/19 modelling and using the submitters given figures, they may in fact be paying slightly less. Also, if any of the properties are considered <b>contiguous</b> for rating purposes; that may reduce the number of minimum charges applicable. – <i>A Guthrie</i>
Chapman, Donald	40	Questions if they will continue to be charged for something which is not used/required if races are closed down. States they are already paying for a race which also requires maintenance.	Noted.
Chertsey Land Company Limited (William McCook)	41	States status quo is the only viable option in the absence of adequate analysis under s.32 of the Resource Management Act.	<i>Strategy &amp; Policy</i> It is officers view that s.32 of the RMA does not apply as rates are set under the Local Government (Rating)

Submitter Name	Page number	Summary	Staff comments
HEARD (tentative)		Submitter extensively expresses concerns with process followed by Council and the legal requirements under s.32 of the RMA. Has not used SW race in over 12 years and is required to pay cost for maintenance. Agrees there is an equity issue but states that any amendment must be based on fact not anecdotal opinion, and that there are other SW matters to be addressed.	Act 2002 and the policy is adopted under the Local Government Act 2002. S.32 of the RMA Amendment Act 2017 relates to 'plans, plan changes and policy statements' as RMA charges.
Clapperton, Malcolm and Rae	43	States no evidence is provided that it is smaller landowners who rely on SW. Submitter is a smaller land owner who does not use SW therefore does not believe this to be true. Majority of the time water in their race is not fit for human or animal consumption (submitter has provided photos). Submitter regularly cleans on the race which becomes dirty from nearby agricultural use. On two occasions, a family member has contracted E.coli from the cleaning of the race. Concerned any increase would not be fair.	This race may be suitable for consideration for closure. – <i>A Guthrie.</i>
Currie, Russell	241	<ul> <li>Joined Springfield water supply in 1981 so that Methven main could be closed off, and agreed with the Council that the farm did not need to pay rates on the Methven mains. As time has gone on these rates have been charged. Submitter had not worried about that until now due to the proposed increase.</li> <li>Submitter believes race should be closed down or they be paid for land use.</li> <li>States that no water races are being used between the hills and the RDR so it would be cost saving and water saving if an agreement was made from the RDR to supply stock water down country.</li> </ul>	Officers are investigating the issues raised and will provide more information to Council in due course. Given the time which has elapsed since the original agreement, we may or may not be able to report back at the deliberations.
Cullimore, Heather and Ian	53	Mill Creek runs through 100m of property. Does not support proposed change as creek seems to be for stormwater with little stock usage. States it is an unfair system as they have no use for the Creek and	It is noted that races that provide for other values/benefits may be more difficult to close. – <i>A Guthrie.</i>

Submitter Name	Page number	Summary	Staff comments
		preference is to have it closed. Would be looking at nearly a 10x increase in water rates.	
Cunneen, Paul HEARD	55	Had historical dispute with Council regarding stockwater (detailed in submission) and has since been unhappy about paying a stockwater rate. Has about 100m of race and states they will be paying about \$6 per metre.	Noted.
Cushnie, Angela HEARD	56	Value of SW race should be looked at in terms of biodiversity and enhancement of mahinga kai. Submitter quotes local Kaumātua "just because they are man-made does not give us the right to take them away."	Recognition of the differing values of the race network is an integral part of any evaluation of race closure. This is to ensure that races with high cultural and ecological / biodiversity values are retained and appropriately protected. – A Guthrie
Daley, Bernard	58	Supports status quo as already on a scheme providing enough water. Not fair to charge \$600 per title. Doesn't use race 95% of time.	Noted.
David	59	States they have a lifestyle block and Council can take away race as cost is high for a few metres of race.	Noted.
Deery, Cliff	238	Does not support as has alternative water source. Would prefer to not have a race at all and thinks an increase would be unfair. States that it is unfair to pay for providing the ability for properties downstream to receive water. Says that if the proposed option is a fairer system then they shouldn't be charged.	Noted.
Dobbs, Loretta	60	Questions why a user pays option has not been considered. Currently pays \$400 per year for an unused race. Also has to pay for a digger to clean (\$1000) as water ranger demanded it be cleaned. States the reason it is clogged up is due to poor management from Council during heavy rainfall events.	It would be extremely difficult to implement and maintain a user pays approach for the stockwater activity. – <i>A Guthrie.</i>

Submitter Name	Page number	Summary	Staff comments
Doody, Pauline	61	Submitter's race is 50m and is not used but pays each year to have it cleaned. Contacted water ranger many times as race has been dry but heard nothing. Objects to paying \$600 per year for something unused. Has kept a folder of information on communications from Council regarding SW over the years and requests a response to feedback as is unhappy with situation.	Noted.
Dyke, Micheal	63	Supports race being closed down therefore opposed to \$600 charge.	Noted.
Everest, Phillip HEARD	65	Fairest option may be Option 2 but needs to be incentive to use alternative supply. Per metre rate is too severe if not using the race. Suggests a differential based on if water is used or not. Flat rate for all properties plus an increased rate for those that use the races.	Noted.
Ewer, Bernadette and Robin	67	Strongly objects to an increases and would prefer race to be closed.	Noted.
Federated Farmers of New Zealand (Elisha Young-Ebert)	127	Agrees with Council that cost needs to be more equally shared amongst those with SW races. Proposal reduces the burden of SW rates, particularly for larger commercial farms who draw no benefit. Submitter generally observes the SW network is largely inefficient and know of many farmers who do not allow their stock access to available SW as contamination is socially unacceptable. This means most of the existing network is underutilised.	Noted.
Feiss, Margaret	68	Doesn't agree with a 700% increase. Has a limited income therefore a move from \$90 to \$600 is major. Race length is less than 100m. Sees the increase as revenue collecting and unfair.	The intention of the proposed rating changes is to reallocate rating revenue rather than collect more. – <i>A Guthrie.</i>
Fowler, Ian	69	Not happy about extra charges as race is in front of property and not used. Submitter has to pay for it to be maintained.	Rateable properties that abut races located in the road reserve typically incur the stockwater rate. – <i>A Guthrie</i>

Submitter Name	Page number	Summary	Staff comments
George, Peter HEARD	70	Supports status quo as has 420m of unused race which is unreliable. Strongly opposes change given cost.	Noted.
Gilpin, Hamish	73	Supports status quo.	Noted.
Girvan, Robert	74	Suggests Council assist farmers/small farms off the system and eventually shut it down.	The cost of providing any "assistance" would have to be borne by general ratepayers as it may be considered highly inequitable to assist people to leave the service and have those costs borne by those remaining on the service. – A Guthrie
Gould, Virginia	75	Does not want the race as the few stock they have are serviced by wells. Race could easily be diverted through neighbour's property.	Submitter could apply to realign race but would require the written agreement of the other property owner to construct the new race on their property. – <i>A</i> <i>Guthrie</i>
Gray, Geof and Marilyn	239	Endorses the intention behind proposed changes, however believes that the proposal does not address the primary issue. Does not use race and therefore does not support proposed changes resulting in an increased charge. Calls on ADC to implement a user pay system to ensure fairness and equity in charges related to stockwater.	
Handley, Carolyn	77	Opposes any change to rates as is on a lifestyle block only requiring around 200m of race. States assistance is rarely required from Council as does not rely on race for water for stock. Submitter lives close to large farms who use the race (and would obviously welcome a reduction in rates) and feels these farms should pay for using the race. States race is often polluted from dairy cows. Does not believe they should pay for a service they do not want. Supports a user pays system but states in this case non-users are being forced to pay for users. States that if rates go up they will contact Council for any small problem with the race, rather than deal with it themselves as they do currently.	Noted.

Submitter Name	Page number	Summary	Staff comments
Harper, Bruce HEARD	79	Requests closure as race is not on their property.	Rateable properties that abut races located in the road reserve typically incur the stockwater rate. – <i>A Guthrie</i>
Harper, Philip	81	Prefers option three.	Noted.
Harrison, Sheryl	82	Strongly supports status quo. Has found the SW unreliable and dirty so changed to using RDR. Would be very unhappy to pay \$600.	Noted.
Hewitt, Terence	84	Submitter states they were surprised to be paying for Mill Creek as a water race as it is a natural watercourse not a SW race. They have never used Mill Creek as a SW race. Have fenced and planted banks to aid biodiversity and aquatic values. Council once conducted maintenance of Mill Creek in 2008 with a digger which left remediation work to be done (at a cost of \$1500 to submitter). The increase would be 715% for their 118m of race. States the increase may be unlawful under s.36 of the Resource Management Act 1991. Taxing a property because it has a natural waterway has no precedence in NZ.	There are a number of examples where waterways are utilised as functioning parts of the stockwater network. Other examples include Lagmhor Creek in Tinwald and many drains in the Hinds area have a similar dual function aspect. – <i>A Guthrie</i> It is officers view that s.36 of the RMA does not apply as rates are set under the Local Government (Rating) Act 2002 and the policy is adopted under the Local Government Act 2002. S.36 of the RMA Amendment Act 2017 relates to 'plans, plan changes and policy statements' as RMA administrative charges.
Hitchcock, Caroline and Morten, Richard	138	Lives on a small block in rural Hinds with 197m of race. Uses very little water - some to chickens and sheep. Happy with status quo and thinks increase of over 500% is unacceptable. Unfair to charge more.	Noted.
Hoekstra, Fred	85	States there is no fair way of dealing with SW if people who do not want creeks have to pay for maintenance, fencing etc. Submitter is aware of one property downstream who uses the race, but 5-6 properties above who do not. If the property who did use the race was subject to the full cost they would agree it is not worth it and may find	It would be extremely difficult to implement and maintain a user pays approach for the stockwater activity. – <i>A Guthrie.</i>

Submitter Name	Page number	Summary	Staff comments
		an alternative. Submitter referenced comment made during the Zoom meeting where everyone must pay for the library but makes the point that SW is a much larger cost and has the nuisance of requiring maintenance (unlike the Library). Preferred option is to make the users pay, and second option would be to have a charge per ha of every rural property.	
Hunter, Jeremy	90	Deeply concerned over proposed changes. Has a property which is .4 hectares. In the last 15 years, Council has not assisted with maintenance of race. Race has been dug out which causes it to require significant maintenance. Submitter must pay for disposal of rubbish after floods. Two neighbouring properties also have around 30m of race which is unused. The \$600 charge would increase submitter's rates bill by 33% each year. Council should find some other way to charge as there will be 841 people unhappy with the increase (according to Council's figures). Submission includes photos.	Noted.
Hydes, Darrell	94	Supports Council's proposed option as thinks it is a fairer way of charging given farms with long lengths of race have to pay a lot and are using little if any water. Also values races for bees, firefighting, stormwater drainage and environmental values.	Noted.
Jackson, Jonathon	97	States the races should be cut off as people need to get their own water as the races should be fenced and the system is too unreliable for stock.	Noted.
Jefferson, John	98	Fenced off race of 132m just inside road boundary provides no benefit to submitter's property. Illogical that a charge is being imposed for something not used/wanted.	Noted.

Submitter Name	Page number	Summary	Staff comments
Kinvig, Douglas	100	Objects to paying for SW when there is never any water in the race on Grahams Rd property. States they have spoken to Council about there never being water but they never get back to them.	Noted.
Kok, Bridget HEARD	102	Thinks there is an anomaly as not all races are equal. One race on property has a reliable supply of water and the other does not. Has had issues when contacting Council. Does not support paying more.	Noted.
Kuipers, Timothy	104	Has less than 10m of race which is unused. Contributing \$600 is unfair for people in similar situations. Supports preferred option if there was an exception for people in similar circumstances, such as a certain sized property or length of race being exempted.	There may be merit in providing a rating exemption for properties where there is a very small length of race running through the property. – <i>A Guthrie</i>
Lamont, Nicola	105	Has no stock and a fully fenced waterway on property which is of no benefit. Race is approximately 6m with half being inaccessible due to driveway. Currently pays minimum charge therefore states \$600 would not be fair unless given the option to have this removed. Suggests Council consider exemption for properties with less than 10 metres of fenced, unused race.	There may be merit in providing a rating exemption for properties where there is a very small length of race running through the property. – <i>A Guthrie</i>
Lowe, Alistair and Bernadette	108	Race occupies 160m but submitter has other sources of water. It is not fair to increase charges when the race are not used - whether the race is being used or not should be a major factor in deciding how to charge.	It would be extremely difficult to implement and maintain a user pays approach for the stockwater activity. – <i>A Guthrie.</i>
Lumsden, George <mark>HEARD</mark> (tentative)	110	States Council needs a policy to replace existing schemes.	Council has outlined the future approach to stock water races in its Surface Water Strategy and the process for race closure is set out in the water race bylaw. – <i>R Mabon</i>

Submitter Name	Page number	Summary	Staff comments
MacDonald, Neil	113	Has 300m of fenced race on a piece of leased land. Does not use the race but does pay for it be cleaned therefore does not want to pay more. Would prefer it to be discontinued.	Noted.
Malcolm, Mark HEARD	114	Thinks status quo is fair and that smaller properties will be penalised under either of the two other options.	Noted.
McCormick, Paul	116	Has a dried up creek in front of property, has not seen water in there for eight months. No stock on property therefore no use. Against any charge and invites Council to view the race.	Some races which have been confirmed as only remaining open to provide a stormwater or drainage benefit may ultimately be better classified as a drainage structures. The process to declare a drainage district, which is required, is quite complex, involving elector polls etc. <i>-A Guthrie</i>
McEwan, Donece and Raymond	117	Does not have a water race on property but is charged for a ditch which runs along Methven Highway (284m). Water is not required but submitter does maintain. Ditch is deep and fast flowing, and is a traffic hazard where there have been several accidents and a death. Preference is to have some of the water diverted to the north Ashburton River and a pipe to take remaining water to Domain and Mill Creek.	This is a main race and also supplies water for the Mill Creek. It is part of 20km network supplied from the Winchmore Intake. – <i>A Guthrie</i>
McIlroy, Bruce and Philomena	122	Does not use the race and states it is hazard as people harvest watercress. States the benefit of the race is to fill the Ashburton Domain pond therefore should not be charged for it.	This is a main race and also supplies water for the Mill Creek. It is part of 20km network supplied from the Winchmore Intake. – <i>A Guthrie</i>
Millar, Maurice and Shirley <b>HEARD</b>	132	Property is 3 hectares with 85m of race. Option 2 has implications which have not been properly considered and cost increase is unfair. It will not achieved desired outcome. Will increase rates by 700%. Submitter has to maintain race and does not need or want it. Closure of races will not be possible where there are mains. The rationale is flawed as justification is based on the workload generated by small	It is noted that races that provide for other values/benefits may be more difficult to close. – <i>A</i> <i>Guthrie.</i>

Submitter Name	Page number	Summary	Staff comments
		landholdings. However, evidence is anecdotal should not be used to justify a 700% increase in rates. If Option 2 is adopted then suggests a smaller minimum charge, or a series of graduated steps for properties containing short sections of SW race.	
Morrison, Alistair HEARD	134	All races should be closed, failing that people who want them should pay or all rural ratepayers share cost.	Noted.
Morrison, Christopher HEARD	136	Has Mill Creek running through property - no more than a stormwater drain. Their stock do not use the drain. Occasionally there are fish but regularly die from contamination. Also polluted with plastic waste and/or froth from stormwater. Requests Council pay them for the privilege of the unwanted 'sewer' travelling through their property.	It has to be acknowledged that there is more work to do to ensure that direct discharges to Mill Creek (managed by Council) are not contributing to incidence of trash and contaminants entering the waterway. Notwithstanding that, there are significant challenges maintaining water quality in heavily modified urban waterways. – <i>A Guthrie</i> .
Mowat, Elaine and Gavin	141	Objects to paying more when they do all the upkeep. Imperative race stays open for flood drainage.	Some races which have been confirmed as only remaining open to provide a stormwater or drainage benefit may ultimately be better classified as a drainage structures. The process to declare a drainage district, which is required, is quite complex, involving elector polls etc <i>A Guthrie</i> .
Neill, Dale and Richard	143	Submitter makes extensive case referring to various Council report including the Opus 2012 Stockwater Report, noting:	Noted.
HEARD		If the charging model must change, then any new structure must be based on fact, not anecdotes. Refers to Council report where it was detailed that officers believe it is smaller properties who rely on SW.	
		In order to apply a fair charge, council must clearly understand the current use of water provided by the race system.	
		In the absence of the above and considering the current economic climate, submitter supports retaining the status quo.	

Submitter Name	Page number	Summary	Staff comments
		Submitter notes the increase would be significant for many, and for them would be a 14-19% increase in total rates. For other submitters it appears to be a 40% increase.	
		Submitter points out that Council recently decided to reduce the total rates increase from 4.88% to 2.5% in light of Covid. The SW changes would increase rates for many to a larger amount.	
		Any options other than the status quo would mean at least 25% of their rates bill would be for SW. Any ratepayers having to pay 25% for one service, such as the library, are likely to be aggrieved.	
Neumann, Ian and Judith	146	Owns a small lifestyle block with own water source therefore does not want to pay for a service not used.	Noted.
Olley, Christopher	148	Status quo should remain until Council has a better understanding of where the water is going and who benefits.	Noted.
		Questions if Trustpower contribute to costs for MAR given they are using water that is consented as SW as per the RDR consent.	
		Those who have bores for domestic and cow shed supplies may not take water from the race, but directly benefit from MAR. Why should they not be charged?	
		Questions why a flat charge of \$600 per block should apply regardless of land area.	
		States BCI are keen to get access to more water for irrigation. Previous mayors have discussed selling off some of the stock water allocation.	
Paterson, Alan and Mary and Pike, Chris	150	Does not use SW race as it is inaccessible to stock due to the drop off therefore does not support paying \$600 for this.	Noted.
Pearce, Mike and Taylor, Helen	152	Does not have stock and would prefer not to have SW race. Used as an aesthetic feature.	Noted.

Submitter Name	Page number	Summary	Staff comments
Pinfold, Colleen and Giles	154	Option 1 is acceptable for the current level of service (supply is unreliable).	Noted.
		Option 2 is blackmail and does not fairly charge.	
		Any increase in charges requires a guarantee of constant water supply.	
		Race is currently unreliable and removal of trees has been required for maintenance.	
		The benefits of SW have been gradually reducing over the years (no water).	
		Council needs to be more proactive in race closures.	
		Questions what will happen to stormwater system if race is closed.	
		Suspects Council staff are not making an effort to supply SW at every opportunity.	
		Suggests only charging for days that water is supplied but acknowledges the administrative (e.g. \$1.75 per day on the basis of \$600/365 days=\$1.64).	
		In summary, does not mind contributing to cost of service but totally opposed proposed cost structure.	
Preston, Michael	157	Would prefer race to be shut as it is unused.	Noted.
Price, Selwyn	159	States there are many reasons why we have SW races - only one is to provide water for stock.	Noted.
HEARD		ADC has a duty towards environmental well-being.	
		Horrified to hear more than one councillor state all races should be closed ASAP as this is disrespectful of the work of the surface water advisory group.	

Submitter Name	Page number	Summary	Staff comments
		Q&A session - submitter thought it was farmer Brown not Mayor Brown speaking. Clear and distinct farming lobby on Council to discriminate against smaller properties in rural areas. Current charging system needs a complete overhaul.	
Procter, James and Lynley	162	Would prefer to pay nothing as haven't used the race in 21 years yet have to pay for cleaning etc.	Noted.
Protheroe, Stefan	164	Only uses a small amount of water (a few buckets) to fill trough. Stream provides good flooding capability. If paying \$600 per year expects regular maintenance and cleaning by Council. Thinks it is very unfair for the increase from \$90 to \$600.	Noted.
Ralston, Mary	166	Current system is fair given small properties do not generate a lot of income. Large properties have a greater ability to pay.	Noted.
Reith, Jane	167	Wants to advise Council they do not need/want the race and are not willing to pay.	Noted.
Reveley, Peter	172	<ul> <li>Questions if ratepayers should be when the only time there is water is when there are high flows and floods. Ashburton Domain and Tinwald Domain both use SW therefore if the races are closed they will have to be funded by the Domain rate. Submitter raises questions for Council:</li> <li>How much do the domains pay towards consent, delivery and maintenance?</li> <li>Present balance of SW account? (Should current ratepayers pay off old debt?)</li> <li>What stage are fish screens at?</li> <li>What stage is the irrigation piping SW trials at?</li> </ul>	The Domains noted are non-rateable and do not currently pay stockwater rates. We are continuing our efforts to avoid having to install fish screens at the required intakes through the closure of the relevant intakes. The Cracroft Intake changes is an example of the proposed approach. The stockwater provision trial through ALIL infrastructure has commenced. A second potential trial through BCI is still being worked through. – <i>A</i> <i>Guthrie.</i> Current ratepayers often pay older debt – principle of inter-generational debt, with multiple ratepayers

Submitter Name	Page number	Summary	Staff comments
			getting the benefit of the work that was funded by the loan. – <i>R Sparks</i>
Richmond, Lawrence	174	Objects to a further charge in rates as does not see how a larger property is subsidising a smaller property in terms of SW service.	Noted.
Rissman, Daphne	176	States they have a private water supply to service paddocks and troughs which can be connected if needed.	Noted.
Roberts, Mark <mark>HEARD</mark> (tentative)	178	Has 30m of race with very few stock. The increase would be 85% which, submitter argues, is to subsidise large properties who use the races. Does not agree this is user pays.	There may be merit in providing a rating exemption for properties where there is a very small length of race running through the property. – <i>A Guthrie</i>
Robinson, Mark HEARD	180	Submitter makes an extensive case for why the proposal should not proceed through detailing their experience with three properties with SW race. Argues the proposal is unfair to both smaller and larger properties. Suggests Council invest resources into coordinating widespread closure of races and understand how various operators allocate and provide water. Submitter has 40 years experience in SW and says that increasing to \$600 will not achieve the desired outcome.	Noted.
Rollinson, Linda	185	Supports full race closure. About to be charged double for something they do not use. Assumes Council must make a profit as the revenue is \$1million. Only people using the race should be charged as per drinking water.	It would be extremely difficult to implement and maintain a user pays approach for the stockwater activity. – <i>A Guthrie.</i>
Saunders, Kenneth	187	Concerned that the proposal beneficial to only a small group of users which the SW system is intended for. Faces an increase from \$109.48 to \$600 for a small property. States that going about hitting everyone with a common fee is what you would expect from the communist government running the country but not what should be done in	It is noted that races that provide for other values/benefits may be more difficult to close. – <i>A</i> <i>Guthrie.</i>

Submitter Name	Page number	Summary	Staff comments
		Ashburton. Submitter notes concerns with the Council use of the Seafield SW system where it is used as a dumping source for stormwater.	
Scott, Annette and Trevor <b>HEARD</b>	189	Does not rely on race for SW. Preference is to have race closed. However, supports Option One if the race must run through the property.	It is noted that races that provide for other values/benefits may be more difficult to close. – <i>A Guthrie.</i>
Seay, Ann and Timothy	190	Supports status quo.	Noted.
Sell, Karen and William HEARD	191	Does not use the race and states Council has no easements or rights of way for carriage of the water across their property. Does not support increases given race is not used. Option 2 is a significant increase and would increase their overall rates by 39%. States Council has no knowledge of who actually uses the races and provides no evidence to justify a change in the system.	ADC legal counsel has confirmed ADC does not need to have an easement or anything official on the title. The LGA and the bylaws ADC makes under this Act, allow Council to construct and maintain stock water races on private property.
Seque, Sheryl and Simon	196	Has around 150m of race totally fenced. Does not use race as has own well. Does not believe the quality of water in race is suitable even for animals to drink. Strongly object to any increase in costs given the race is not used or wanted.	Noted.
Shirley	197	States it is time a meaningful discussion/action was developed for water races as there has been a lot of dithering on this issue. Has two properties side by side so would be paying \$1200 for something not required.	If any properties are considered <b>contiguous</b> for rating purposes; that may reduce the number of minimum charges applicable. – <i>A Guthrie</i>
Simpson, Brian	198	Echoglen farms SW race (Hinds) is approx. 2,500m. Race is considered an eyesore and requires continued maintenance from spraying and requiring digger (2 days per year, cost of \$2,000) Submitter refers to requirement to keep waterways free from stock.	Noted.

Submitter Name	Page number	Summary	Staff comments
		Would like race to be closed for good to enable replanting program on farm.	
Sloper, Deborah	200	Pays over \$1500 per year for water which is not supplied. Farm below them does not require SW and is the end of the SW line therefore finds it hard to fathom why they should pay for something not used. Supports user pays for SW - if you use it then you pay for it.	Noted.
Smith Aluminium Limited (Murray Smith)	202	Supports status quo as water is not being used.	Noted.
Smith, Grant HEARD	205	Doesn't use the race and states is legally required to fence swimming pool yet the race is a hazard for children.	Noted.
Smith, Ronald	206	Questions what the proposal is for properties with SW race that is unused - will Council get rid of it?	Noted.
Sprott, Alister	208	Has applied with two neighbours to have two races closed. This is being held up by one neighbour. If the race is not closed, submitter wants neighbour to pay for the 4.5km of race passing through farm as it is not needed given they have no stock.	Noted.
Stewart, Susannah and Amos, Matthew	210	Recently purchased a 20 acre property. Most paddocks have water supplied by well and trough - a large portion of the race is inaccessible due to an existing laneway and conduit (photos provided with submission). Submitter considers the proposed increases unfair given the inaccessibility due to the conduit which is there to service other properties.	Noted.
Stivens, Harold and Sheryl <mark>HEARD</mark> (tentative)	212	Requests Council reviews stance on SW races as historic waterways with biodiversity values for the District.	Ecological values of water races are acknowledged in the Surface Water Strategy and form part of the criteria for race closure <i>Strategy &amp; Policy Team</i>

Submitter Name	Page number	Summary	Staff comments
		Questions if there is evidence that smaller landowners get the most benefit.	
		Making the races so unaffordable that landowners look to other options will potentially destroy the freshwater values of races.	
		Submitter refers to issue with bees and Longbeach School in 2018 where landowners began divesting races away from the natural channel they had flowed.	
		Landowners purchasing land know they contain SW races. Notes Selwyn Council has no recognised freshwater values contained in water races.	
Submitter, Anonymous 1	5	States it is unfair for people who do not want races on their properties. Larger properties should pay more if they have more race.	Noted.
Submitter, Anonymous 2	6	States the increase for small block holders will be 250-600%. Questions what additional service will be provided given they already look after the race themselves. States the proposal only gives a discount to farmers, who are the real users of the water.	Noted.
Submitter, Anonymous 3	7	States that ifs cost is increased by \$500 for an unused race they will insist race is diverted as the rate rise for people with small amounts is extortion. Asks if the Council are making decisions on rumours.	Submitter could apply to realign race but would require the written agreement of the other property owner to construct the new race on their property. – <i>A</i> <i>Guthrie</i>
Submitter, Anonymous 4	8	Feels it is unfair to charge smaller landowners for water which is not clean and no guaranteed supply. Uses the water for home supply and sometimes has muddy water coming out of taps.	SW is not being provided for human consumption as it can be unsafe to drink. – <i>A Guthrie</i>
Submitter, Anonymous 5	9	Supports status quo	Noted.

Submitter Name	Page number	Summary	Staff comments
Submitter, Anonymous 6	10	Supports Council's proposed option as states that every property shares the cost of an essential service with larger properties contributing more than smaller.	Noted.
Submitter, Anonymous 7	11	States that the per metre rate should be for water that is actually on the owners property.	Noted.
Sweetman, Colin	214	<ul> <li>Property is Residential D. SW race is not utilised and no intention to use in future.</li> <li>Happy for race to be closed.</li> <li>Believes a 550% increase is patently unfair.</li> <li>Smaller property owner views are likely to be overridden by Council therefore seeks a fairer system for those who don't use the water.</li> <li>Supports user pays and accepts that while the race is there they will have to make a contribution to pay even if not used (like the Library but the Library costs far less than \$600 per year)</li> <li>Suggests a base charge for SW such as the status quo or a maximum of \$200 per property.</li> <li>Option 2 is not fair for all users.</li> </ul>	Noted.
Tait, Allan	216	Submitter provides extensive detail on history of stock/surface water in Lower Hinds/Lowcliffe area. States Council needs to be aware of the potential problems that could be caused by indiscriminately closing races in the Lower Hinds / Lowcliffe area simply because they were not required for stock water. Believes it would be inequitable to continue to charge full rates for race with no water simply because the race is on the property. Suggests that if landowner can demonstrate the race is fully fenced, and not used for stock then Council should remit the water rates for that property.	Noted.

Submitter Name	Page number	Summary	Staff comments
Tait, Maurice and Tracy	219	Has SW race which is unused and only runs through property to service others. Does not agree that small lifestyle block owners should subsidise other properties as in Options 2 and 3.	Noted.
Thompson, Graeme	220	Supports proposed option as requires SW for horses and fire control. Happy to pay \$600.	Noted.
Todd, Jacqueline	221	Submitters SW race runs through six properties to deliver to one farm who does use it. This farm has access to Lyndhurst Water Scheme and ALIL. Frustrated that they have to pay for SW when they have invested in their own system. Would prefer race was closed down, as would vast majority of land owners. Best option would be to propose closing the scheme to see who actually wants and will pay for the water.	Noted.
Trost, Graham	223	Supports status quo as SW race is less than 100m and not much stock. The other options would severely compromise the financial viability of small stock numbers. Does not agree with extra payments.	Noted.
Trott, Heather	225	States the race next to property is incapable of carrying water and has been for several years yet they are charged. The race is not required as well water is used. Requests they are not charged for this anymore.	Noted.
Turney, Robert	226	Supports option three (equal charge to all properties).	Noted.
Vessey, Roger	227	Supports status quo.	Noted.
Wallace, John	228	States status quo is best option when there are people who do not want the races paying for them but have to pay for maintenance when someone down the line wants them.	Noted.
Walsh, John <b>HEARD</b>	229	Does not require SW therefore does not support any option.	Noted.

Submitter Name	Page number	Summary	Staff comments
Whillans, David	231	States the current system is unfair as they have a reticulated trough system and three separate water race lines through the property to supply other properties downstream.	Noted.
Williams, Mihaela	233	Supports status quo.	Noted.
Williams, Richard	234	<ul> <li>Has only 117.3m of race and pays minimum charge. The increase under proposal would be \$490 and this unfavourable as the race has not been used, and is located on the roadside (therefore may not be within the boundary). Submitter understands the other users of the race to be Mill Creek residents and the Domain. Requests responses are given to specific questions as detailed in submission regarding:</li> <li>Annual maintenance cost of race versus actual rates.</li> <li>Whether Ashburton township residents with race running past their boundary pay rates for SW, and if not why do they not pay for maintenance of the Domain race?</li> <li>Other options considered for getting water from the Ashburton River to the Domain.</li> </ul>	Noted.
Woods, Christopher	237	Prefer to have races ajoining property switched off as they are not used but submitter must hire a digger each year to maintain. Races are now too deep for stock to use so are fenced off. Interested in whether their property would see an increase or reduction under the proposal.	Noted.

### 2. Solid Waste Collection

Council consulted on extending the boundary of solid waste collection to include 162 extra properties in the Willowby, Laing's Road, Melrose Road, Chertsey, Rakaia, Methven and Lake Hood areas.

Submitter Name	Page number	Summary	Staff comments
Baldwin, William <b>HEARD</b>	15	Supports as it encourages better use of contractor.	Noted.
Bird, Alan	30	Supports as currently pays for rubbish removal.	Noted.
Bowler, Angela	31	Brings recycling into town as needed therefore does not support extra cost and requests Council use the money going to bins towards grading the road.	Noted.
Brown, Philip HEARD	32	Does not support as is happy to dispose of waste personally (lives in Rakaia). States that if the scheme goes ahead they will bulldoze the Council provided bins and drop them off at the recycling centre.	Noted.
Brown, Rachel and Mark	33	Lives on Barkers Road, Methven and requests their address is included in Solid Waste Collection as the truck passes by their property.	Noted.
Burridge, Dennis	35	States Council in the past stated it would have nil waste within a year. States some people put out an overfill of bins each week but they only put a bin out every 5-6 weeks, therefore subsidising others. Supports a user pays system.	Noted.
Durham, Jonathan	62	Supports (in particular Willowby block).	Noted.
Girvan, Robert	74	Does not support as states should be opt in/out.	This service is not economic to provide on an Opt In/Opt Out basis. – <i>C Goodwin</i>
Green, Suzanne	76	Supports (does not live in proposed areas).	Noted.
Horne, Gregory and Lynette	87	Does not support as manages recycling through Longbeach school collection area. Does not want additional financial burden in post Covid times.	Noted.

Submitter Name	Page number	Summary	Staff comments
Kelly, Grahame	99	Supports proposed extensions as long as charges are served on properties benefitting.	Noted.
Kinvig, Douglas	100	Does not support as too expensive.	Noted.
Kok, Bridget HEARD	102	Ambivalent - (lives on Grahams Road). Would use it if there but not happy if SW rates go up as well this could result in a \$1,000 year increase.	Noted.
Liemburg, Hendrik and Yvonne	107	Happy with taking own waste to refuse park (submitter lives on Garatan Road).	Noted.
Lowe, Alistair and Bernadette	108	Does not support (lives on Fords Road) as house is a long way from roadside and happy using the recycling station at Willowby. States their neighbour also feels the same. Questions if bins can be towed with a bungy cord.	Noted.
Malcolm, Mark HEARD	114	Supports (does not live in extension area).	Noted.
McIlroy, Bruce and Philomena	122	Supports as hopefully this will stop dumping of rubbish.	Noted.
Mulligan, Lal	142	Supports more solid waste collection for rural and states Council needs rules around rural disposal of rubbish as burning of rubbish in holes is a 'no no'.	Noted.
Neumann, Ian and Judith	146	Does not require service and thinks service should be opt in/out.	This service is not economic to provide on an Opt In/Opt Out basis. – <i>C Goodwin</i>
Pierce, Alistair and Elaine	153	Does not support Willowby block extension as uses the local recycling station and anything else is taken to the dump. Cost would be more than dump cost. Green waste bin not big enough therefore would still	Noted.

Submitter Name	Page number	Summary	Staff comments
		incur green waste cost at dump. Wheelie bins in 100km area would add risk for blind corners.	
Price, Selwyn HEARD	159	Supports (does not live in proposed areas).	Noted.
Pritchard, Jonathan	161	Does not support as does not produce much waste therefore feels the increase in cost would be significant. Also states it would be difficult to drag the bin down a 330m shingle road (lives on Fords Road).	Noted.
Schmack, Brent and Fleur	188	Does not support as recycles at Longbeach School with a couple of trips to tip each year. \$232 cost is not acceptable.	Noted.
Smith, David	203	Does not support as lives close to Longbeach School and does not require this service.	Noted.
Submitter, Anonymous 5	9	Does not support the proposed extension (however no address provided so not clear which area this submitter is referring to). Feels it would be unsafe to have large wheelie bins on road side and increase chance of accidents.	Noted.
Submitter, Anonymous 7	11	Supports to provide collection for areas of new developments.	Noted.
Vessey, Roger	227	Does not support extension.	Noted.
Walsh, John <b>HEARD</b>	229	Does not support as utilises Longbeach School recycling.	Noted.
Wilson, Andrew	236	Already has recycling at the corner of road and doesn't need other bins so would not use service and not happy to pay extra cost.	Noted.

### 3. Elderly Persons Housing

Council consulted on introducing a general rate component for EPH, therefore EPH would be 0-30% general rate and 70-100% fees and charges. This would include rental increases of around \$10 per week.

Submitter Name	Page number	Summary	Staff comments
Baldwin, William HEARD	15	Supports proposal and states all have a duty to support housing -being transparent will keep ratepayers informed.	Noted.
Beavan, Rod HEARD	21	<ul> <li>States lack of full information and confused reasoning. Questions if other alternatives have been considered. Makes extensive case detailing historical process for Council communicating with tenants regarding issues with EPH including: <ul> <li>2017 consultation on EPH Policy – Council staff presentation at Balmoral Hall to discuss proposed policy changes, rent and goal to use 25% of income towards rent. Submitter is concerned the issue of using reserve funds was not raised at this time.</li> <li>Questions if the letter dated 1/7/20 and the letter of 17/6/19 are connected. (If so, when did consultation take place?)</li> <li>Assumes the issue of reserve funds has arisen in the last 12 months as this was not referred to in the letters regarding rental increases.</li> <li>Submitter has not received any notification of rental increases for this year and states this must mean the issues raised by Council with underfunding must be getting worse.</li> <li>Refers to the Guardian article (2/7/20) where Cr Braam discusses EPH. Submitter states it raises the following questions: <ul> <li>Why change funding before discussion (on future of EPH)?</li> <li>What is current balance of reserve funds?</li> <li>What is the estimated cost of upgrading units?</li> </ul> </li> </ul></li></ul>	<ul> <li>There are 2 issues surrounding Elderly Housing for Ashburton District Council <ul> <li>i. how Council will manage Elderly Housing going forward and</li> <li>ii. how will Council fund the operation of its Elderly Housing Portfolio. Depending on which model of management Council chooses there will be a need for funding of the operation and this policy sets out how this will be achieved in the future.</li> </ul> </li> <li>Council undertook a review of the Elderly Housing portfolio in order to keep rents at a reasonable level. Council has drawn down on reserves to address revenue shortfalls for a number of years. However, since 2017 legislation surrounding Landlords 'obligations have changed dramatically which has placed a greater demand on financial reserves. These reserves will be depleted in 2 years with the effect that current rental policy will not</li> </ul>

Submitter Name	Page number	Summary	Staff comments
		<ul> <li>How was the general rate component determined? (i.e. how did Council come to the \$2 of \$90 per year for all ratepayers?)</li> <li>What does 'around \$10 per week' rental increase mean?</li> <li>Would the ideal be to have rentals the same for everyone, single and double units?</li> <li>How will the balance of the reserve fund be increased?</li> <li>Submitter suggests Council form a working group to review ownership, management and funding options, consult with the community and investigate fully.</li> </ul>	generate sufficient income to meet the maintenance and refurbishment required. A 20 year plan has been outlined for the replacement and refurbishment of units with the proposed policy change providing income to sustain this plan. The letter of 17/6/19 refers to investigating options for the management which is still being looked at and tenants will be consulted as part of this investigation. The letter of 1July 2020 refers to this policy. The legislation surrounding tenancies and Covid 19 is such that it would be difficult for Council to have any rental increase for tenants this year and this will also place a strain on the reserve. I cannot comment on the article in the Guardian as this as it was stated was Cr Braam's personal opinion. <i>C. Windleborne</i>
Durham, Jonathan	62	Supports preferred option.	Noted.
Everest, Phillip HEARD	65	Supports preferred option given Council already has the buildings. Important to keep them up to standard as tenants have contributed to the community over their working life.	Noted.
Federated Farmers of New Zealand (Elisha Young- Ebert)	127	Suggests funding shortfall would be better met by UAGC than general rate as EPH is a discrete social activity and the cost should be equally shared. Should be consideration for a modest increase in rent and	Noted.

Submitter Name	Page number	Summary	Staff comments
		assessment on how that can help meet the shortfall but accepts if the assessment shows that rents would be unaffordable.	
Gilpin, Hamish	73	Supports preferred option.	Noted.
Girvan, Robert	74	Suggests Council take a mortgage/loan for repairs and progressively increase rent to cover this cost.	Noted.
Haven Housing (Jackie Girvan)	83	Submitter's organisation is interested in discussion with Council regarding the future of EPH.	This is currently taking place. <i>C. Windleborn</i>
Kelly, Grahame	99	Thinks a 50-50 split between options 1 and 2 - a moderate increase in rent and less of a general rate component. States annoyance with having 52 years to ensure they can provide for themselves while others end up being subsidised because they haven't made an effort.	Noted.
Kok, Bridget <b>HEARD</b>	102	Thinks Council should be responsible for some social housing.	Noted.
Lowe, Alistair	108	Suggests government support to fund upgrades and rent support through WINZ.	Noted.
Lynne	112	Opposed to ratepayers subsidising units when the means testing doesn't seem adequate and rents are under market value.	Noted.
Malcolm, Mark HEARD	114	Questions if this is core Council business and why ratepayers should subsidise others rent when it is the job of government services. Notes rental need upgrades and every possible means should be explored, including selling them.	A project of Elderly Housing Management is currently being undertaken. <i>C. Windleborn</i>
McGee, Rodger	120	Supports preferred option.	Noted.

Submitter Name	Page number	Summary	Staff comments
Mulligan, Lal	142	Council should leave community housing to private sector, particularly given lack of maintenance of current stock.	Noted.
Neumann, Ian and Judith	146	Does not support as thinks EPH should be funded by the government not the community.	Noted.
Overend, Robert	149	Supports proposed option as not all have equal opportunities in life and all deserve residential respect.	Noted.
Price, Selwyn HEARD	159	States Council has a duty under the Local Government Act to the social well-being of all residents. Current EPH standard is poor and ADC must get these up to liveable standard or provide new housing. Disappointed to hear comments from a committee chair in the media suggesting the proposal was a fait accompli.	Noted.
Smith, Ronald	206	Does not think the wealthy should pay - should be one rate for everyone.	Noted.
Vessey, Roger	227	Supports status quo.	Noted.

#### 4. Wastewater

Council consulted on grouping wastewater schemes so that everyone connected pays the same regardless of location (around \$420 per connection)

Submitter name	Page number	Summary	Staff Comments
David	59	Does not support either option as has their own wastewater system.	Noted.
Durham, Jonathan Gilpin, Hamish	62 73	Supports preferred option.	Noted.
	15		
Lynne	112	Supports option one (status quo).	Noted.

Submitter name	Page number	Summary	Staff Comments
Shirley	197		
Vessey, Roger	227		
Malcolm, Mark HEARD	114	If option two is administered, it is unfair because all properties are of a different size, thus having different amounts of wastewater to dispose of.	Council wastewater networks are not used for the collection and disposal of stormwater, where loadings can vary according to property size and impervious surfaces. Wastewater volumes comes from residential uses like toilets, bathing and food preparation and business uses that require water e.g. car washes. – <i>Strategy &amp; Policy Team</i>
Overend, Robert	149	Requests Council comment on why some new dwellings have Council approved soakage pits. These should not have to pay full wastewater rates.	Noted.
Smith, Ronald	206	Does not think wastewater should be charged in line with drinking water as \$350 overall would be enough.	Noted.
Williams, Mihaela	233	Supports option one (status quo).	Noted.

#### 5. Boundary changes – Lake Hood and changes to Water Supply and Wastewater

Council consulted on extending the boundary at Lake Hood to include the Village Green subdivision; and amending the group Water Supply and Wastewater boundaries to reflect new service areas and encompass future development.

Submitter Name	Page number	Summary	Staff comments
Baldwin, William <b>HEARD</b>	15	Supports boundary changes.	Noted.

Submitter Name	Page number	Summary	Staff comments
Durham, Jonathan	62		
Green, Suzanne	76		
Methven Community Board (Dan McLaughlin) <b>HEARD</b>	124		
Malcolm, Mark HEARD	114	Supports boundary changes for Lake Hood.	Noted.
Price, Selwyn HEARD	159	Supports on the proviso that when the properties are built they pay an urban rate like Lake Hood.	Noted.
Smith, Ronald	206	Supports as long as it is user pays.	Noted.
Vessey, Roger	227	Does not support.	Noted.

#### 6. EANC

Council consulted on using rates to support EANC to a greater extent, shifting to 60-80% UAGC and 20-40% fees and charges.

Submitter Name	Page number	Summary	Staff comments
Everest, Phillip HEARD	65	User pays should exist in part. The EANC is meeting a need in the community so suggests looking at relativity of cost per session between court users and pool users. Affordability could be an issue after Covid. Suggests encouraging outdoor exercise to support health of community.	Noted.

Submitter Name	Page number	Summary	Staff comments
Girvan, Robert	74	EANC should be self-funding.	Noted.
Methven Community Board (Dan McLaughlin) <b>HEARD</b>	124	EANC should remain as 60% UAGC and 40% fees and charges.	Noted.
Smith, Ronald	206	Thinks EANC should be UAGC 20/40 and fees & charges as 60/80.	Noted.

# 7. How rates are charged

Various changes proposed to EPH, Memorial Halls and Reserve Boards, Reserves and Campgrounds, Cemeteries, EANC, and Regulatory Services. Funding ranges proposed for many activities.

Submitter Name	Page number	Summary	Staff comments
Gilpin, Hamish	73	Concerned about move back to targeted rate for Methven community pool and reserves board. Does not see this as sustainable for community as it is not only Methven ratepayers that benefit from these facilities.	Noted.
Kelly, Grahame	99	User pays should be used where appropriate. Pensioners use facilities very little so why should they pay. When determining council policies it should be remembered that many are on a fixed low income.	Noted.
Lumsden, George <mark>HEARD</mark> (tentative)	110	Suggests a full review of rates system.	<i>Strategy &amp; Policy</i> The review of this policy has followed an in- depth process (first principles review) which

Submitter Name	Page number	Summary	Staff comments
			can be considered a full review of the rates system.
Malcolm, Mark HEARD	114	Believes Council has a moral duty and financial ability to maintain EANC, Memorial Halls and Reserve Boards, Community Services, Regulatory Services, Environmental Health and Youth Council. Supports boundary changes for Lake Hood.	Noted.
Methven Community Board (Dan McLaughlin) <b>HEARD</b>	124	States Methven hot pools should be included in the wastewater, solid waste and business amenities. Questions the reason for listing Methven Community Pool under MCB. Community Grants and Funding should be 100% UAGC as it benefits all in district. Memorial Halls and Reserve Boards - unfair to use targeted rate when everyone benefits. Suggests extending the Methven 'urban' rate to include other Methven ratepayers as many of them are users (to help with funding).	Opuke Thermal Pools & Spa will be included on the wastewater network if it is connected to the network. It will pay a rate for waste collection and business amenities if it falls within the targeted rating area. If not, Council would have to change the area boundary. Methven Community Pool and the Methven community board share a similar area of benefit, hence the same rating area is used to fund both activities. Support for community grants & funding change is noted. Submitter appears to favour a larger rating area boundary for the Methven Memorial Hall and Reserve Board. Submitter should provide more information on their preferred boundary. – <i>R Sparks</i>
Mt Hutt Memorial Hall Heritage Centre (Martin Nordquist)	139	As Board Chairman, requests reinstatement of \$25k targeted rate for Mt Hutt Memorial Hall. Revenue stream through the targeted rate must continue given the reliance on rental income and user charges.	\$20,000 was reinstated for the 20/21 year, but no set amount is explicitly provided for in the proposed R&FP, this will be addressed through the LTP budget process.

Submitter Name	Page number	Summary	Staff comments
Retirement Villages Association Of New Zealand (John Collyns) HEARD	168	Submitter makes an extensive case for Council create a special "Registered Retirement Village Rate" to more clearly reflect residents' ability to pay and actual consumption/use of Council services/amenities. Using Lochlea RV as an example, approx. \$2,640 per annum is charged in rates per unit. However, the ratio of residents to dwellings in retirement villages in Ashburton District is 1.24 which is less than half the standard ratio. Residents in aged residential care place less demand on roading infrastructure as they make fewer trips on average than other residents. Submitter proposes a range of differentials to be applied for registered residential villages.	Differentials add administrative complexity, which would need to be taken into account. Would also increase the rates for all non- retirement village ratepayers, Council would need to decide if this was fair and equitable. Retirement village ratepayers are also eligible for rates rebate. <i>R. Sparks</i>
Smith, Ronald	206	Regulatory Services should be fees and charges with nothing on rates. Should be no general rate for something we don't use. Argues for more user pays.	Noted.

#### 8. General

Submitter Name	Page number	Summary	Staff comments
Brown, Philip HEARD	32	Submission process Thanks Council for submission process and states sometimes Council dreams up schemes with no consultation.	Strategy & Policy Noted.
Hydes, Ian	95	<b>Roading</b> States Line Road from Methven to Cairnbrae is in a serious and dangerous condition - should be ripped up and resealed properly.	Noted – this is not a matter that can be addressed through the R&F Policy, but this comment will be passed onto the Roading Team.