



Federated Farmers of New Zealand

Submission to the Horowhenua District Council on the Draft Annual Plan 2017/18

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**SUBMISSION TO THE HOROWHENUA DISTRICT COUNCIL ON
THE DRAFT ANNUAL PLAN 2017/18**

To: Horowhenua District Council

Name of submitter: Federated Farmers of New Zealand
James Stewart
Manawatu/ Rangitikei Province
President

Contact person: Kristy McGregor
Regional Policy Advisor

Address for service: Federated Farmers of New Zealand
PO Box 945
Palmerston North, 4340

Mobile: 027 551 1673
Email: kmcgregor@fedfarm.org.nz

This is a submission on the following proposed plan – Horowhenua District Council Draft Annual Plan 2017/18.

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

The specific provisions of the proposal that the submission relates to and the decisions we seek from Council are as detailed on the following pages.

Federated Farmers wishes to be heard in support of this submission. Our preferred hearing date is the middle of the day/early afternoon on Wednesday 3rd May.

SUBMISSION TO THE HOROWHENUA DISTRICT COUNCIL ON THE DRAFT ANNUAL PLAN 2017/18

INTRODUCTION

1. The Manawatu/Rangitikei Province of Federated Farmers welcomes this chance to submit on the Horowhenua District Council Draft Annual Plan 2017/18.
2. We acknowledge any submissions made by individual members of Federated Farmers.
3. Federated Farmers is focused on the transparency of rate setting, rating equity, levels of service for key responsibilities and both the overall and relative cost of local government to agriculture. We submit to Annual Plans and Long Term Plans through-out New Zealand. We also submit on central government policies that affect local government revenue and spending, with the aim of ensuring that local government have the appropriate tools to carry out their functions.
4. We commend the Council on providing a mechanism for community engagement through the provision of this Annual Plan, despite the fact that consultation on Annual Plans where there is not a significant deviation from the Long Term Plan is no longer a requirement. We are pleased to see that after our calls for consultation and transparency last year, the need for consultation with the community has been noted.

SUMMARY OF RECOMMENDATIONS

- That Council will make a concerted effort to reduce debt levels.
- That Council will lead the discussion on expenditure by assessing and prioritising current and planned expenditure and then discussing these options with the community.
- That rates increases are reduced to be no higher than the level of inflation and Council endeavours to prioritise expenditure with the view to decrease unnecessary costs.
- That Council carefully consider the above options for minimising the impact of the rating valuation spike on rural properties.
- That the further develop means to make for a fairer and more equitable rating system.
- That example rates are continued to be provided so readers are able to see what each contribution to particular rating mechanisms and can compare rates between property types.
- That the rates calculator is continued to be provided for landowners to examine their proposed rates.
- That Council should only use the general rate where there is a correlation between a ratepayer's property value and the benefit they receive from the expenditure, or the amount the ratepayer contributes towards the need for the expenditure.
- That Council implement a full capital value rating system, with a differential for farming businesses.
- That Council meet with stakeholders including Federated Farmers, during the preparation of the Long Term Plan 2018-2028, to discuss options and what this might look like in the Horowhenua District.

- That a separate differential category for properties used primarily or solely for farming is established, within a capital value rating system.
- That targeted rates are used where there is a direct link between who receives the benefit and the activity.
- That targeted uniform charges are used when everyone receives the same benefit from an activity.
- That the Council introduces a Uniform Annual General Charge, and this funds activities that provide public benefit but may be too small to justify their own targeted uniform charge.
- That Council review the Revenue and Financing Policy, and include stakeholders such as Federated Farmers in this review, prior to presenting it in the Draft Long Term Plan for comment.
- That Tourism is not funded by the land value general rate. If Council wishes to continue with tourism activities, then a rate targeted at the tourism sector should be introduced as the sole funding source.
- That the above principles of the role of Council in economic development are noted.
- That Economic Development is funded by a Uniform Annual General Charge.
- That the value of further development in the District is captured, including through necessary development contributions and rating mechanisms.
- That a conversation about harnessing growth is held as part of preparation of the 2018-2028 Long Term Plan.
- That Council engages with stakeholders on the above mentioned matters through the development of the Long Term Plan 2018-2028.
- That any proposed spending on shared pathways is funded through a targeted rate or Uniform Annual General Charge, with each ratepayer contributing the same dollar amount.
- That should there be appetite for heritage incentives, these are funded through a targeted rate or Uniform Annual General Charge, with each ratepayer contributing the same dollar amount.
- That should heritage incentives be introduced, they only apply to buildings scheduled within the District Plan, and apply through the waiving of RMA consenting fees.
- Federated Farmers submits that the term minimal is defined within the document.
- Federated Farmers submits that the proposed process for decision making is retained.
- Federated Farmers submits that comprehensive engagement occurs even when only selected members of the community are affected.
- Federated Farmers submits that the Council continues to engage stakeholders in a meaningful way.
- Federated Farmers submits that the Council retains the acknowledgement of communities of place and communities of issue.
- Federated Farmers submits that the Council retains use of the International Association of Public Participation spectrum.

- Federated Farmers submits that the Council will be flexible in shifting the nature of engagement upon feedback garnered through consultation.
- That Council review the significance criteria for engagement in light of the above mentioned scenario, so that where there will be an increase in expenditure or rates consultation on the Annual Plan will occur.

FINANCIAL STRATEGY

Debt

5. Federated Farmers is concerned by Council's increasing levels of debt. Council's debt for the 2017/18 year, in the Long Term Plan was expected to decrease by \$2.48 million. Instead, in the Draft Annual Plan 2017/18 it will increase by \$5 million. That is a \$7.48 million increase in one year.
6. This kind of increase in debt is not sustainable. While Council claims it is operating within its debt affordability benchmark, this is not the sort of debt that leaves scope for further sustainable borrowing should there be a significant but unforeseen requirement for expenditure over the next few years.
7. Debt increases are reasonable for capital expenditure, providing that the assets have a long life and debt is kept within limits. At the same time, debt should not be used as an alternative to the Council and the community making hard decisions around what areas of expenditure are a priority now, and which can be deferred.
8. Council needs to find cost savings to keep expenditure in check. It is unlikely the community will specifically identify, let alone agree on, specific areas of expenditure which should be cut back. We consider it is Council's responsibility to lead this discussion by assessing and prioritising current and planned expenditure and then discussing these options with the community. The current increases in debt cannot be maintained throughout another Long Term Plan.

Recommendations:

- That Council will make a concerted effort to reduce debt levels.
- That Council will lead the discussion on expenditure by assessing and prioritising current and planned expenditure and then discussing these options with the community.

Rates Increases

9. Over the past few years ratepayers have experienced rates increases well above the rate of inflation, whether it is expressed as the consumer price index (which is of primary importance to ratepayers) or the local government cost index. This places considerable burden on ratepayers.
10. For the 2017/18 year, rates will make up 72% of Council's total revenue against a national average of 59.69% (Statistics New Zealand, *Local Authority Statistics: December 2010 quarter*.) This is one of the highest levels of rating reliance in the country, and is evidence for the need of more user charges and the retention of development contributions as an alternative funding mechanism to rates.
11. We remind Council that the incomes of ratepayers will in no way increase to the same extent as the proposed increases in rates, with the implication that the costs Council is imposing on its ratepayers will squeeze out other areas of expenditure, whether this is investment in businesses or putting food on the table.

12. We believe there is a strong argument for a re-assessment of Council businesses and service delivery with a view to cutting back operating expense significantly. Operating expenses for community services are continuing to increase, and these are areas, amongst others, where spending needs to be reined in. Subsequently we recommend rates increases over the life of the plan be kept to within the Local Government Cost Index.
13. Federated Farmers notes that the expected rates increase has been revised from an increase of 7.72% signalled in the 2015-2025 Long Term Plan, to an increase of 5.64% in this Draft Annual Plan 2017/18, dependent on the outcome of consultation. This is encouraging, however there is still work to be done to keep rates increases to a minimum.
14. Federated Farmers notes that the Consultation Document clearly outlines that this will differ between properties, as a result of the revaluation undertaken last year and the ten-year plan to amend differentials of the General Rate. We are pleased that Council has recognised this within the Document, particularly when some of our members are experiencing significant rates increases this year.
15. When we look at the rating impact on the example properties, as provided within the Supporting Documentation, we see that rural properties will experience, on average, an increase of 9.5%. A rural property with a land value (after revaluations) of \$3,010,000 will see a rates increase from \$6,803 to \$7,542. A rural property with a land value of \$6,871,000 will see a rates increase from \$16,780 to \$18,485. This is 9.5% and 9.6% respectively. Feedback from our members suggests that they will see their rates increase, in some cases for a block of bare land, see a 50% increase in rates for the 2017/18 year.

Recommendations:

- That rates increases are reduced to be no higher than the level of inflation and Council endeavours to prioritise expenditure with the view to decrease unnecessary costs.

Revaluations

16. It appears that these increases have been exacerbated by the impact of property revaluations which will take effect from the start of the new rating year on 1 July 2017. Rural land owners with large properties seem to be particularly impacted, when looking at the rates for residential properties in the town centres, whom are experiencing increases in the vicinity of three to six percent. This is despite the fact that rural landowners may not have actually done anything of note to develop their property, however the increase will be based on sales within the area. Of course with the Horowhenua District Council utilising a land value based rate, any increase in land value directly affects the contribution a land owner will pay.
17. It is not just the Horowhenua District Council which is experiencing a revaluation and resulting spike in farm values. We have been working with Councils around the country who have recognised the issues with the revaluation. During annual plan seasons we have identified the following options for Council to consider:
 - Cut back on spending plans, so reducing the overall rates increase. This will reduce rates increases faced by everyone (but won't have a relative impact on rural rates versus those paid by other ratepayers).
 - Changes to rating policy, including making greater use of the uniform annual general charge (to the extent the 30 percent cap allows), making changes to targeted rates, and introducing a differential on the general rate. Such measures would result in large reductions in the proposed increases for rural and semi-rural properties and only small increases in the already modest increases proposed for residential and commercial properties.
 - One-off measures to smooth the most extreme impacts of revaluations, such as a 'cap and spread' approach where rates increases driven by district-wide revaluations above a threshold (e.g., 10 percent) are remitted with the foregone revenue made

up by slightly higher rates paid by all other ratepayers, or by reducing the operating surplus, or by dipping into reserves (if any available).

- Leniency around the payment of rates, especially the first quarterly instalment which is due by 20 September. This comes at a particularly difficult time for dairy farmers awaiting their first substantial milk payment which is not until 20 October.
- Ensuring rates remissions are available to landowners so that rates relief can be applied where they meet certain criteria.

18. Federated Farmers recommends that Council should carefully consider all of the above options. A mixture of these would be warranted. Federated Farmers suggests in this instance, that the significant increases of rates are all the more reason that Council needs to engage in a review of their Revenue and Financing Policy to make for a fairer and more equitable rating system, in the lead up to the 2018-2028 Long Term Plan. Further, we encourage Council to continue to keep rates increases to a minimum and look to maximise efficiencies where possible.

Recommendations:

- That Council carefully consider the above options for minimising the impact of the rating valuation spike on rural properties.
- That the further develop means to make for a fairer and more equitable rating system.

TRANSPARENCY

19. Transparency of rate funding sources and spending is extremely important to Federated Farmers. As a result of many years of lobbying, the Local Government Act 2002 Section 15 in Schedule 10 sets out new requirements for transparency in Funding Impact Statements. Indicative rates have been provided on page 6 of the Draft Council Financial Statements. These indicative rates demonstrate a good level of transparency by showing land and capital values, total rates contribution, and amounts for individual rating mechanisms. They also reflect a wide range of example properties with realistic values for land in the District. We thank Council for their effort in providing realistic examples.

20. Federated Farmers supports the provision of the rates calculator on the District Council website so that landowners can better understand the rating impact on their properties for the 2017/18 year. We thank Council for providing this service and hope that it will continue.

Recommendations:

- That example rates are continued to be provided so readers are able to see what each contribution to particular rating mechanisms and can compare rates between property types.
- That the rates calculator is continued to be provided for landowners to examine their proposed rates.

REVENUE AND FINANCING STRATEGY

General Rate

21. Federated Farmers considers that rating based on property value does not reflect the benefit received from Council services. It also means that high value properties such as farms are contributing disproportionately more to rates than lower value commercial and residential properties, regardless of the relative earnings and of the extent to which the property creates demand for council services.

22. Federated Farmers submits that Council should only use the general rate where there is a correlation between a ratepayer's property value and the benefit they receive from the expenditure, or the amount the ratepayer contributes towards the need for the expenditure.
23. The Council already makes excellent use of targeted rates, and Federated Farmers considers that the Council should introduce a uniform annual general charge to lessen the reliance on the land value general rating mechanism.

Recommendation:

- That Council should only use the general rate where there is a correlation between a ratepayer's property value and the benefit they receive from the expenditure, or the amount the ratepayer contributes towards the need for the expenditure.

Capital Value Rating

24. Compared to land value, rating on capital value achieves a better connection between services received and costs than land value. In recent years, the value of land has become highly elevated at the same time as the running costs of councils have increased, and it is not practical, just, or sensible to rate on land value. At the extreme, land value rating results in the strange situation where a large industrial operation on a rural block that generates dozens of truck movements every day pays the same rates a neighbor with an equivalent area of undeveloped land.
25. Federated Farmers is aware of opposition to changes from land value to capital value rating in some districts, but note that it is no longer ethical or sensible to rely on land value to set rates because the costs of running the councils have increased with inflation, additional roles and duties, population growth, and reduced financial support from central government. Under these circumstances, the price distortions introduced by land value rating become excessive.
26. Federated Farmers submits that Council needs to implement a full capital value rating system. We propose with a capital value rating system, the introduction of a differential for farming businesses to distinguish commercial operations from farming properties. Federated Farmers would be happy to meet with Council during the preparation of the Long Term Plan 2018-2028 to discuss options and what this might look like in the Horowhenua, drawing on our experience of working with Councils in other areas.

Recommendations:

- That Council implement a full capital value rating system, with a differential for farming businesses.
- That Council meet with stakeholders including Federated Farmers, during the preparation of the Long Term Plan 2018-2028, to discuss options and what this might look like in the Horowhenua District.

Differentials

27. The following comments are provided as food for thought on a change to the rating mechanisms. Federated Farmers believe that differentials and targeted rates are a constructive means to achieve both transparency and equity in a funding system limited to rates and charges on property. When relying on property value rates we believe that differentials are necessary.
28. Under a land value rating system, large rural properties may pay a disproportionate share of rates in return for benefits reaped. This has resulted in the necessity of creating a rural differential, to reduce the inequality for rural landowners.

29. Using a capital value rating model has the advantage of ensuring that the improvements on a property are incorporated in the rates assessment. Demand on most council's services tends to be generated by more intensively developed properties rather than bare land. There is a clear trend across local government toward the adoption of capital value as a rating basis.
30. Federated Farmers appreciates that a move to capital value may in fact result in an increase for the rates bills of some of our members who have made significant capital investment into their property. However, we believe these concerns are best addressed through a differential on farming properties (discussed further in the next section). As a general comment, capital value rating system is a better (albeit still imperfect) way of accounting for the relative demand each property makes of Council's services and infrastructure, when compared to a land value based rate; with the caveat that further rating tools (particularly intelligent use of targeted rates and uniform charges) also need to be appropriately utilised.

A Differential for Farming

31. When designing the business rating category, or differential, it must be acknowledged that farming business are distinct and unique from other businesses. The total value of the productive assets of a farm are almost entirely captured in its capital value, compared to a standard commercial operation, which tends to be valued based on other aspects (for instance, goodwill) which are not 'rateable'. Nor does the relative capital value of a farm correlate to the relative demand that farm places on Council's assets, or the relative benefit received from Council services, compared to an urban based commercial operation. Finally, Farming businesses are also homes, and the place in which farmers raise their children.
32. It is noted in the Council's summary of the Advantages of Capital Value, it is suggested the price paid for business properties is usually linked to the rental income or economic return derived from the business enterprise and to the use of Council services the property is likely to need.
33. Federated Farmers would expect that Council has gone through a process to establish the relative benefit received from the activities of businesses categorised in the business rating category. This exploration would have concluded that a \$5,000,000 farm on the outskirts receives less relative value from particular activities than a \$5,000,000 urban commercial operation. A farming property will also receive less economic return per square metre than derived from a commercial operation. Yet the proposal for an undifferentiated capital value based system ignores this reality.
34. Without a differential system, any activity that is funded through the capital value of the property is likely to result in a large contribution of rates from farming enterprises, regardless of the incidence of either relative benefit or relative ability to pay. Without a differential on rural properties, farms would simply be penalised because they happen to rely on large amounts of land to generate their income.
35. Federated Farmers is also concerned that without a differential for farming properties farm values will continue to increase, while commercial and residential properties depreciate, resulting in farmers paying greater than their share of rates based on their value. The current rural differential that capped the contribution of farming properties to 25% of the general rate and 35% of the roading rate relieved this concern.
36. Federated Farmers proposes a separate differential category, within a capital value rating system, for properties used primarily or solely for farming. There are many Councils rating with a Capital Value system that retain differentials particularly for farming properties, for this reason. These include District Councils such as Westland, Queenstown Lakes, Invercargill, Christchurch, and Dunedin.
37. Councils generally increase the amount commercial operations pay with a multiplier differential (of 1.9 or 2.5) while reducing the amount farmers pay through a reducing

differential (0.9, 0.7 or 0.5). It is rare for there to not be a differential for the farming community compared with other businesses in the district. Federated Farmers appreciates that there may be concerns from the Commercial community in respect to the differential applied to this sector. Federated Farmers would support the Council engaging a robust assessment of the relative benefit received from activities funded through the general rate, and the appropriate level of differential needed to reflect the lesser relative use of Council activities by the farming sector. However, based on an assessment of Council's current targeted rating and uniform charges, and an assessment of the level of differential applied in other areas, we would support a differential in the range of 0.8.

38. The introduction of a differential for farming properties would result in three differentials: Business, District Wide, and Farming.

Recommendation:

- That a separate differential category for properties used primarily or solely for farming is established, within a capital value rating system.

Targeted Rates

39. Federated Farmers supports the Council's use of targeted rates as a funding mechanism for a range of activities. Funding these services on a user-pays basis means that there is a direct link between benefits and funding sources. The great strength of targeted rates, whatever their basis, is the fact that they are transparent by appearing as a separate line item on the rates demand and being reported separately from activities funded by the all purpose general rate. This makes it easier to compare the cost of the service to a farm as compared to an urban business or residential property.

40. Targeted rates are an appropriate mechanism to fund activities and services that provide a direct benefit to certain communities. The Council employs targeted rates on capital value for roading, and for urban rating units, targeted rates based on capital value for stormwater. Targeted rates through fixed charge of a uniform amount are also used for various services such as Library services and Community Centres, Representation and Community Leadership, Aquatic Centres (Swimming Pools) and Solid Waste Disposal.

41. The great strength of targeted rates, whatever their basis, is the fact that they are transparent by appearing as a separate line item on the rates demand and being reported separately from activities funded by the all-purpose general rate. This makes it easier to compare the cost of the service to a farm as compared to an urban business or residential property.

42. Federated Farmers continues to support the introduction of a targeted rate for stormwater for urban rating units. Stormwater is an urban cost that subsidises the expense of curbing, guttering, grates and stormwater pipes in town. Farmers do not use stormwater infrastructure, and therefore we support the rationale of the Council in shifting this cost to urban ratepayers whom utilise the infrastructure.

Recommendations:

- That targeted rates are used where there is a direct link between who receives the benefit and the activity.
- That targeted uniform charges are used when everyone receives the same benefit from an activity.

Uniform Annual General Charge

43. Federated Farmers encourages maximum use of uniform annual general charges and targeted uniform charges. When these mechanisms are utilised every ratepayer pays the same amount for the public good services of council. Higher use of uniform annual general

charges reduces reliance on the property value general rate as a funding mechanism, and flattens the distribution of rates bills between high to low value properties.

44. The Draft Annual Plan 2017/18 does not provide officially for a uniform annual general charge, instead using targeted rates to fund specific activities, and capital value general rates to fund the balance. Federated Farmers recommends that a uniform annual general charge should be introduced so that Council can rate for services that provide an equal or indistinguishable amount of benefit across ratepayer groups.
45. There is a legislative cap on use of UAGC at 30% of rating revenue. Without an official UAGC, this leaves Horowhenua District Council scope to fund activities through the UAGC. Where the benefit received or the contribution to the cost of the activity has no correlation to property value, or where the activity does not provide any specific benefit to any particular ratepayer groups, should be included in the UAGC calculation. We have provided some suggestions of these below.
46. Some activities such as Representation and Governance are recognised by the Council to have a 100% public good benefit in that all residents can participate in democracy and so these are funded by a targeted uniform charge applied on a SUIP (Separately Used or Inhabited Parts) basis. Targeted uniform charges are also used for Rooding, Stormwater, Libraries, Representation and Community Leadership, Solid Waste and Swimming Pools. Federated Farmers agrees with the Council that this is a fair way of ensuring that rating is fair and reflects the equal access the whole district has to these activities.
47. Federated Farmers has identified some other activities that are considered to provide a high level of public good, which could be funded by a uniform annual general charge, or by a targeted uniform charge, as opposed to the general rate from which they are currently funded:
 - Emergency Management in the Community Support group is reported to have public benefit, and everyone benefits from access to resources, support and welfare and recovery measures, in the event of a fire or a Civil Defence emergency. People with high value properties will not benefit more from these activities even though they will be contributing more through the land value general rate.
 - Reserves and Beautification acknowledges that as reserves can be used by anyone and any charge or fee would limit accessibility and participation, the general rate is the most appropriate method of funding passive reserves. Not only do farmers have their own open space on their rural properties, but they are contributing more via the capital value general rate to provide open space for everyone. Libraries are funded by a targeted uniform charge in recognition that everyone has equal access, even if they do not actually use the library themselves. A similar justification can be used for recreation reserves and funding shifted from the land value general rate to a flat fee per property.
 - Sports Grounds are funded by the land value general rate, with the exception of fees and charges. The Council reasons that sports grounds cannot be self-funded by fees and charges because it would risk impacting on use and participation and accessibility by the public. However, there is no link to use of, or access to, sports grounds being determined by land value rating as it is proposed to be funded, rather everyone has the same opportunity. Therefore, a uniform charge would be more appropriate.
48. While these activities have been reported as being small cost and therefore not being justified for a separate rating mechanism, cumulatively they will add up and impact ratepayers who have high property values such as primary producers and rural landowners. The introduction of a formal uniform annual general charge would allow all these activities which only require

relatively small amounts of funding to be rolled together under the uniform annual general charge so that all ratepayers contribute the same.

49. We ask Council to review the Revenue and Financing Policy, including the UAGC and targeted rates in the 2018-2028 Long Term Plan, in order to make the Horowhenua District Council rating system fairer and more equitable. We expect the Council to include stakeholders such as Federated Farmers as it reviews its Policy, and prior to presenting it in the Draft Long Term Plan for comment.

Recommendations:

- That the Council introduces a Uniform Annual General Charge, and this funds activities that provide public benefit but may be too small to justify their own targeted uniform charge.
- That Council review the Revenue and Financing Policy, and include stakeholders such as Federated Farmers in this review, prior to presenting it in the Draft Long Term Plan for comment.

VISITOR INFORMATION & ECONOMIC DEVELOPMENT

50. Visitor Information and Economic Development is reported to receive 100% funding from the land value based general rate. Federated Farmers is pleased to see that Visitor Information has been separated from Economic Development as per our submission to the 2015-2025 Long Term Plan.

Visitor Information

51. Federated Farmers has concerns that land value based general rating which is paid by all ratepayers is being used to fund a particular industry. Farmers in their own right are successful and economically viable enterprises. Farmers pay industry levies to promote the output of their business and they should not be placed in a position where they are required to fund the support and promotion of other businesses.
52. Federated Farmers disputes that tourism provides a public benefit, and we consider that tourism should not be funded by general rates. While tourism income provides *indirect* economic benefit to all ratepayers, so too do other industries that fund their own promotion, like farming. The distribution of economic benefit resulting from tourism is not evenly spread among the community, and nor should the costs of promotion. Tourism promotion is not a public good service and should not be funded as such.
53. Core services were defined by Rodney Hide when he was Minister of Local Government as: “transport services (roading, footpaths and public transport); water services (water supply, sewage treatment, stormwater and flood protection) and public health and safety services (refuse collection and regulation of nuisances)” (Cabinet Office (2009) *Improving Local Government Transparency, Accountability and Fiscal Management* EGI Min (09) 6/10, p.4)
54. However, Federated Farmers would not oppose a rate targeted at businesses that would directly benefit for the funding of tourism-related expenditure, instead of using rates collected from all ratepayers for an activity that provides unequal benefits.
55. The Tararua District Council has introduced a rate targeted at the industrial/commercial sector for the purposes of funding tourism promotion; we recommend that the Horowhenua District follows their lead. The Long Term Plan reports that the benefits of tourism are difficult to assign to any one industrial group, but we assert that benefits are clearly directed at accommodation, hospitality and attractions businesses.

56. The land value general rate should not be used to fund tourism, as this means that farmers and other land owners are paying to prop up an industry that does not provide them with direct benefit.

Recommendation:

- That Tourism is not funded by the land value general rate. If Council wishes to continue with tourism activities, then a rate targeted at the tourism sector should be introduced as the sole funding source.

Economic Development

57. Federated Farmers supports economic growth and improved social and economic wellbeing in the Horowhenua District. We support strategies for increased investment, job growth, skill growth, income growth and an enhanced reputation for the District.
58. Federated Farmers sees that Council has a role in Economic Development, however believes this should be at a reasonable cost for ratepayers. Federated Farmers supports the Council's involvement in initiatives such as the Regional Growth Strategy, Central New Zealand Agribusiness Strategy to build the strength of the region in agribusiness.
59. We see Council's role as an enabler rather than a provider, which is referred to on page 785 of the Supporting Information, Council Activity Statements, in that economic development is realising the District's economic potential over the coming years.
60. Federated Farmers notes that expenditure on economic development will increase from \$537,000 forecast for 2017/18 in the Long Term Plan, to \$915,000 in this Draft Annual Plan. Federated Farmers members were both surprised and concerned by this significant increase at first glance. Upon better understanding the Economic Development role played by Council our members are more content with the expenditure in this area. The Economic Development team needs to ensure that their work is better communicated with the community and other business owners.
61. However, effectively the question being asked by this increase in expenditure is what role should Council have in economic development? *what role should Council play in economic growth?* This is a question of great interest to Federated Farmers. We provide the following comments on our view of local government's participation in economic development activities in the Manawatu/Rangitikei region. These comments reflect the feedback we have provided to both Rangitikei District Council in their development of the Rangitikei Growth Strategy, the Manawatu District Council as they prepared their Economic Development Strategy, and Horizons Regional Council as they considered their role in economic development, particularly the Regional Growth Strategy. These principles are:
- That ongoing and sustained economic development outcomes result from the effective operation of the private sector. While there is a role for local government in promoting, providing and/ or enabling economic development at the local level, any such involvement should balance the risk that Council may crowd out private sector development and innovation, or simply result in a transfer of funding from ratepayers to commercial operations. Where local government involvement does not achieve this balance, the result is restricted, not better, economic development.
 - It is critical that Council's role in economic development is clearly defined and based on who is best placed to deliver the desired outcomes in the most effective and efficient manner. In many instances it is likely that Council's optimal role will be simply to coordinate the development of a shared vision for the Horizons region and act as a forum for discussion, without stepping into the role of private enterprise.

- From Federated Farmers perspective, Council's key roles include providing an appropriately enabling resource management framework, and infrastructure, including roading and telecommunications, to ensure that agricultural production is enabled. In some instances there may be a need to provide coordination and assistance, where scale and a lack of industry or sector coordination are material issues for the economic development of the region.
 - Federated Farmers supports Council's efforts to recognise and reflect local economic strengths and comparative advantages through local economic development initiatives. We believe this will be a critical factor to the success of the strategy. Agriculture is vital to the District's economic prosperity. Central government has identified the region as a potential area for investment. Federated Farmers believes it is important the District harnesses opportunity from the government's intention to double agribusiness exports from the Manawatu-Whanganui region by 2025.
 - We encourage Council to play a facilitative role in economic development listening to and addressing the concerns of primary producers and rural communities and developing solutions to address these concerns, particularly in respect to potential resource management issues and/or regulatory costs imposed on the sector. For instance we believe Council has a critical role in supporting business through keeping rates to an acceptable cost and having an effective and efficient consenting process.
 - This facilitative role includes providing easy access to Regional Plan rules, consents, infrastructure plans and connections, information, statistical and demographic data. There may be circumstances where Council has a role in introducing collaborative partners for cluster type activities but this extends only to
62. We want the Horowhenua District needs to capture the full value of the development in the District, and as noted above, this should not be all about facilitating business growth but require the work of the policy and planning team will be critical to ensure that any development in the region is in keeping with the vision for the District and enables farming to continue to be a viable industry, not crowded out by housing development.
63. Federated Farmers advocates that the expenditure on Economic Development would be best funded through a Uniform Annual General Charge, rather than through the general rate, reflecting the whole of community benefit.

Recommendations:

- That the above principles of the role of Council in economic development are noted.
- That Economic Development is funded by a Uniform Annual General Charge.
- That the value of further development in the District is captured, including through necessary development contributions and rating mechanisms.
- That a conversation about harnessing growth is held as part of preparation of the 2018-2028 Long Term Plan.

WHERE TO FOR 2018 & BEYOND

64. Federated Farmers notes mention within the consultation document of a number of issues that Council will be considering in the lead up to the development of the 2018-2028 Long Term Plan. These include the Roads of National Significance – Otaki to North of Levin, and potential growth related changes to the District Plan.

65. Federated Farmers would like to signal to Council through this submission that we are very keen to be a part of these conversations, particularly where planning and decision making is likely to occur around future development and growth of our residential areas. Of course this directly affects the farming sector when proposals to increase the size of residential areas are being canvassed.
66. Federated Farmers has raised in our above comments on the Revenue and Financing Strategy the need to discuss capital value rating as a fairer and more equitable means of rating. Federated Farmers would like a full capital value rating system to be back on the table, and would be happy to engage in further meetings with Councillors and Council staff over the coming months to discuss what this might look like.

Recommendations:

- That Council engages with stakeholders on the above mentioned matters through the development of the Long Term Plan 2018-2028.

CHANGES FROM THE 2015-2025 LONG TERM PLAN

SHARED PATHWAYS

67. Federated Farmers notes the proposal to develop a shared pathway network in the District. This will begin in 2017/18, developing share pathways within parks and reserves, between such parks, and connecting local towns. Council is proposing to spend either \$100,000 or \$250,000 on this project.
68. Federated Farmers notes the three options presented within the Consultation Document. Farmers already pay a considerable amount towards parks and reserves, sports grounds; recreational facilities the community enjoys. Federated Farmers is opposed to spending on shared pathways from the general rate, not matter what figure is allocated. Funding this project through the general rate would mean farmers contributing significantly more than someone who lives in town, who will have greater access to the pathways. While it may only seem a small amount now, it appears that Council is intending to grow the expenditure for share pathways over the coming years, through consultation on the 2018-28 Long Term Plan.
69. Federated Farmers submits that projects such as shared pathways, if desired by the community, should be paid for by a targeted rate or Uniform Annual General Charge. This should be a set amount where all ratepayers contribute equally to the costs. If such an arrangement cannot be reached, Federated Farmers opposes spending on the development of the shared pathways network.

Recommendation:

- That any proposed spending on shared pathways is funded through a targeted rate or Uniform Annual General Charge, with each ratepayer contributing the same dollar amount.

HERITAGE INCENTIVES

70. Federated Farmers notes Council's intention to introduce heritage incentives for owners of heritage buildings. This is proposed to recognise the public good element of protecting sites of historical significance.

71. If heritage incentives were to be introduced, Federated Farmers would want to see that there would be a clear criteria developed for the use of these funds, including sharing the benefits between multiple owners of heritage buildings. It should also only apply to buildings that are included in Schedule 2 of the District Plan.
72. It appears the method for funding these heritage incentives has not been determined. Possibilities could include a discretionary fund where Council allocates funding; one where consent costs are waived; or alternatively, where rates remission is granted to owners undertaking work. Federated Farmers suggests Council consider waiving the costs of a resource consent fee, however owners would still be required to pay rates and building consents.
73. As per our submission on the shared pathway network, this should be funded through a targeted rate or Uniform Annual General Charge. This should be a set amount where all ratepayers contribute equally to the costs. Federated Farmers oppose the use of the general rate to fund heritage incentives, which would see rural landowners funding a much greater proportion of the incentives.

Recommendations:

- That should there be appetite for heritage incentives, these are funded through a targeted rate or Uniform Annual General Charge, with each ratepayer contributing the same dollar amount.
- That should heritage incentives be introduced, they only apply to buildings scheduled within the District Plan, and apply through the waiving of RMA consenting fees.

SIGNIFICANCE & ENGAGEMENT POLICY

74. The Manawatu/Rangitikei Province of Federated Farmers welcomes this chance to submit on the Draft Significance and Engagement Policy as part of consultation on the Annual Plan. Federated Farmers submitted on the Draft Significance and Engagement Policy in 2014, and again provides these submissions in the interest of supporting public involvement in decision making.
75. Federated Farmers is focused on providing opportunities for communities to have their say in matters that affect them. We encourage the engagement of communities in council decision making for policy that is responsive to community needs and interests. Effective Council engagement on key issues is a crucial factor to the success of our members, for efficient and effective local governance, and the wellbeing of the Horowhenua District.
76. Federated Farmers appreciates the drivers for change to consultation, enacted through the Local Government Amendment Act 2014. At times, consultation can be unwieldy and costly, with previous consultation requirements often resulting in large costs but little feedback or engagement from community members. We support the overall intent to provide for more flexible and effective engagement and consultation.
77. At the same time, Council's policies for engagement should reflect the fact local government decisions are made locally because there is a need for these decisions to reflect local preferences, expectations, concerns and challenges.
78. Exactly what constitutes 'effective engagement' will differ depending on the issue or issues under discussion, the perspective of the individual, the number of affected parties, and an assessment of whether the costs of consultation are justified by the significance of the issue.

We consider it would be difficult to develop significance and engagement policies which appropriately account for all circumstances.

79. As a result, we see this process as a way of providing for engagement frameworks which allow for truly effective and nuanced discussions with members of the community, in a way that recognises the importance of these discussions and relationships to Council's decision making processes and those impacted by Council decisions.

Introduction

80. The introduction to the Significance and Engagement Policy identifies a number of bodies which have a role in identifying and communicating the views of local communities on strategies, policies, plans and bylaws to the governing body, including the Foxton Community Board, Iwi Advisory Group, Environment , Economic and Environmental Portfolio.
81. Federated Farmers understands the role of a Community Board, as this is clearly defined within the Local Government Act. We are however unsure of the role of the Iwi Advisory Group, Cultural, Economic and Environmental Portfolios. Federated Farmers submits that should these groups be key to the early stages of decision making their roles be clearly defined, and communicated with the community.

Significance

82. Federated Farmers commends the Council's approach to determining significance; taking all decisions to be significant rather than requiring efforts to prove their significance in order to engage the community.
83. Federated Farmers suggests that the term 'minimal' is defined. While a decision may be considered to have a minimal effect on the community as a whole, it may have a significant impact on specific communities or interest groups within the wider community.
84. Federated Farmers supports the proposed process for decision making, including exploring possible options and weighing up the cost benefit. We particularly support the transparency of detailed information available to the public.
85. We support the Council's decision to include views already expressed in the community, including those raised in previous submissions, where there has been no material change to the issue. Considering the wide range of issues requiring decisions by Council, Federated Farmers supports the approach that it is very difficult to "forsee every possibility".
86. Federated Farmers agrees engagement needs to occur when "the impact of consequences of the decision or proposal on the affected persons (being any number of persons) will be substantial". We support the view that comprehensive engagement needs to occur even when only a select few members of the community will be affected by a proposed decision.
87. Federated Farmers supports Council's proposed procedure for determining significance. Federated Farmers supports Council's proposed list of strategic assets.

Engagement

88. Federated Farmers supports the Council's commitment to engaging with community and stakeholders in a meaningful way, and the recognition of communities of place, and communities of issue. Each community will respond to different approaches to engagement.

89. We value the continued efforts of the Council to engage stakeholders in a meaningful way, using a variety of tools and techniques to enable meaningful and timely connections that encourage feedback and participation in Council processes.
90. We support the identified principles for community engagement. Particularly relevant for the rural community are using plain language; giving people honest information in a way that suits them; involving people right through the decision making process; and give people time to think about the issues and respond to them. Federated Farmers supports the inclusion of the principle "Engage in the community by going to where people are and not always expecting them to come to Council". For interactions with members of the farming community, this could include shed meetings in woolsheds, dairy sheds and on farm locations, to enable the most effective participation from the farming sector.
91. Federated Farmers submits that the use of visual cues, particularly in discussion of issues like rate through Annual and Long Term Planning, can also be useful, and suggest this is added as a method of engagement.
92. Federated Farmers supports the inclusion of the principle "Engage in the community by going to where people are and not always expecting them to come to Council". For interactions with members of the farming community, this could include shed meetings in woolsheds, dairy sheds and on farm locations, to enable the most effective participation from the farming sector.
93. The farming and rural community is an industry with ebbs and flows of workload throughout the year. We support efforts of the council to make consultation easy by offering meeting times after hours as necessary, and also providing sufficient time to respond to submissions, particularly as farm work is seasonal and work load can make time to read and respond to proposals during certain times of the year very difficult for farmers.
94. The feedback loop between community members and Council should be continual. The door of the Council should be open for community feedback.
95. Federated Farmers recognises there will be times when urgency is required and consultation may not be able to occur. However, we are unclear by what is meant when the Draft Policy states that "if the cost of engagement is likely to considerably increase the cost of a commercial transaction to Council. In these situations Council will either not engage at all, or tailor its engagement to suit circumstances in which the decision is to be made". Federated Farmers suggests that the cost of engagement should not be a barrier to engagement, where a decision is deemed significant.
96. Where a decision is deemed significant, Federated Farmers supports the proposed approach of Council to identify and assess practicable options, quantify the costs and benefits resulting from the decision, provide detailed information accessible to the public, maintain transparent records, and take into account
97. We note the intention, where there is a matter that involves a significant decision in relation to land or a body of water, to take into account the relationship of Maori and their culture and traditions. We support this. However, we also request that the Policy is amended so as to note that where there is a decision being made with regards to land or waterbody, all affected landowners are notified and invited to participate in the decision making process.
98. We support the council's use an engagement spectrum in accordance with the International Association of Public Participation spectrum. We support that this is a iterative process, and that Council staff and decision makers will be prepared to take on community, stakeholder and resident opinions as to the extent of an issue's significance. This might mean an issue is moved from an "inform" category to a "consult" category after feedback has been received from a Council newsletter, as an example.

Recommendations:

- Federated Farmers submits that the term minimal is defined within the document.
- Federated Farmers submits that the proposed process for decision making is retained.
- Federated Farmers submits that comprehensive engagement occurs even when only selected members of the community are affected.
- Federated Farmers submits that the Council continues to engage stakeholders in a meaningful way.
- Federated Farmers submits that the Council retains the acknowledgement of communities of place and communities of issue.
- Federated Farmers submits that the Council retains use of the International Association of Public Participation spectrum.
- Federated Farmers submits that the Council will be flexible in shifting the nature of engagement upon feedback garnered through consultation.

How Annual Plans are considered within the Significance & Engagement Policy

99. Federated Farmers expressed concern last year when Council decided not to consult on their Annual Plan. We therefore, wish to discuss the manner in which Annual Plans are considered within the Significance and Engagement Policy.
100. Federated Farmers understands that under the newly introduced section 95(2A) of the Local Government Act 2002, the requirement to consult (and adopt a consultation document) does not apply if the proposed annual plan does not include significant or material differences. Over the past few years at a national level Federated Farmers has expressed concern about the discretion given to Councils, over whether or not, and how they will consult on Long Term Plans and Annual Plans.
101. Consultation on the Annual Plan, while no longer required by law, offer a critical opportunity for Council to engage with the community and reflect transparency of their operations. Without taking the opportunity to engage with the community, and ratepayers, on an annual basis, Council is reduced to engaging with the community on material matters only once every three years as part of the Long Term Plan process. This is a vast period of time and will easily lead community members to feel disconnected from Council decision making. We believe this is why when surveyed regarding their intentions to carry out consultation on the Annual Plan last year, all but half a dozen of the North Island Councils were intending to consult. Whether or not Councils had a significant or material matters, Councils identified it as an important means of engaging with their community on issues.
102. Federated Farmers raised concerns during 2016, that despite a significantly increased expenditure on a number of Council projects, it was not enough to trigger the Significance & Engagement Policy. While the specific projects that Council may have been engaging in were not, on appearances, of relevance to Federated Farmers, any projects the Council undertake that is rate funded can impact on farmers and rural landowners. This is especially the case where the project or activity is funded by the general rate.
103. Further, the broad context must be considered. In our submission to the 2015-2025 Long Term Plan, Federated Farmers highlighted concern with the increasing spend on nice to have items. We recommended that Council lead the discussion on expenditure by assessing and prioritising current and planned expenditure items and discussing these options with the community. Over the past few years, Horowhenua District Council has shown little ability to

spend within its means, and overspending has become an acceptable norm. Ratepayers have continuously worn this burden, with rate increases over the past few years well above the rate of inflation.

104. Consultation on an Annual Plan provides an opportunity for residents and ratepayers, particularly rural landowners whom are some of the largest contributors of rates in the region, to regularly contribute to decision making. Federated Farmers is unclear how the Annual Plan is placed within the Significance & Engagement Policy. Federated Farmers seeks assurance that a repeat of 206 will not occur, in that expenditure and rates increases of that nature are captured by the significance criteria and therefore warrant consultation.

Recommendation:

- That Council review the significance criteria for engagement in light of the above mentioned scenario, so that where there will be an increase in expenditure or rates consultation on the Annual Plan will occur.

ABOUT FEDERATED FARMERS

Federated Farmers is a not-for-profit primary sector policy and advocacy organisation that represents the majority of farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand's farmers.

The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

This submission is representative of member views and reflect the fact that local government rating and spending policies impact on our member's daily lives as farmers and members of local communities.


Manawatu/Rangitikei Federated Farmers thanks the Horowhenua District Council for considering our submission.




SUBMISSION FORM

ANNUAL PLAN 2017/18 CONSULTATION

Submissions can be:

 **Delivered to:**
Horowhenua District Council,
126 Oxford Street, Levin

 **Posted to:**
Horowhenua District Council,
Private Bag 4002, Levin 5540

 **Emailed to:**
annualplan@horowhenua.govt.nz

 **Completed online at:**
www.horowhenua.govt.nz/consultationdoc

 **Faxed to:**
(06) 366 0983

Submissions must be provided to Council by no later than **5:00pm on Monday, 10 April 2017**

Contact Details (You must provide your contact details for your submission to be considered)

Title (e.g. Mr/Mrs/Miss/Dr):

Full Name: Judith Anne Sayer

Name of Organisation:

Address for service:

Shannon

Post code: 4821

Telephone: 06 36 27824

Mobile:

Email:



Hearing of Submissions (please indicate your preference)

Do you wish to present your submission to Council at a Hearing? Yes No

Sign language interpretation required? Yes No

If YES then would you prefer to speak on – **Wednesday 3 May** OR **Thursday 4 May**

Would you prefer to present your submission in the – **Daytime** OR **Evening**

Note: It is not guaranteed that every submitter will get their preferred time to present.



TOPIC 1: SHARED PATHWAYS

Tick below to identify your preferred option

Option 1: Status Quo – work within existing budget	<input checked="" type="checkbox"/>
Option 2: Allocate \$100,000 to shared pathways for 2017/18	<input checked="" type="checkbox"/>
Option 3: Allocate \$250,000 to shared pathways for 2017/18	<input type="checkbox"/>

Reasons why this is your preferred option (continue on last page if necessary)

Reason why: essential to maintain status quo thus enabling to keep the standard quality of the shared pathways, with the possibility of some improvements, (with the hope of improving tourism to the Harawhenua, as well as local participation) e.g. clubs, youth. Healthy activities experiencing the great outdoors.

TOPIC 2: HERITAGE INCENTIVE FUNDING

Tick below to identify your preferred option

Option 1: Status Quo – Provide no funding	<input type="checkbox"/>
Option 2: Allocate \$50,000 per annum	<input checked="" type="checkbox"/>
Option 3: Allocate \$100,000 per annum	<input type="checkbox"/>

Reasons why this is your preferred option (continue on last page if necessary)

Money allocated should enable maintenance to existing historical buildings^{listings} as well as added new listings, allowing protection of our pioneer heritage building, adding to our tourism interests industry. To go forward in the modern world we must understand and protect our heritage.

TOPIC 3: SIGNIFICANCE AND ENGAGEMENT POLICY

Tick below to identify your preferred option

Option 1: Status Quo

Option 2: Adopt the draft Significance and Engagement Policy

Option 3: Update the draft Significance and Engagement Policy following feedback from the community and adopt it



Reasons why this is your preferred option (continue on last page if necessary)

Clearer liason with Council and the public should lead to a better understanding with less confrontation, allowing integrity and honesty, with all groups in our Society particularly now N.Z. is a multicultural society



ADDITIONAL COMMENTS

Please identify any additional comments you have on what is proposed as part of Council's Draft Annual Plan 2017/18

Foxton upgrade

Unnecessary monies spent on the upgrade of the the main street, would have been better allocated to the upgrade of the water and waste water. The health and well being of the community at large, as well as visitors to Foxton. is important.

Pensioner Housing, should remain with council to preserve statis quo, why because another provider, would need to have a rent increase to off set his ^{new} investment which I feel council is letting go a sound ^{viable} investment.

WHAT OTHER PROJECTS OR IDEAS SHOULD COUNCIL BE CONSIDERING FOR 2018/19 AND BEYOND

(refer to page 11 to see the list Council is currently focusing on. Do you agree with what we have identified? What else could we look into?)

Project

1) The Waterwheel¹ in Shannon, fundraising by Progressive Assn, has already paid for the components required for the construction at no cost to the ratepayer, we have been waiting 12yrs to be completed. When completed will be an added attraction to Shannon plus Tourism in the Horowhenua, enhancing the Horowhenua as the wonder water region in N.Z.

2) Better Toilet signage, outside convenience in Balance St, plus an indication outside possibly the Library

An additional Toilet, Te Marie park opposite the Horseman Cafe, to help relieve wary travellers in a hurry passing through, in lieu of the bush's.

Foxton Returned Services Cenotaph should remain at the present site, moving is a insult.

Privacy Act 1993

Please note that submissions are public information. Information on this form including your name and submission will be made available to the media and public as part of the decision making process. Your submission will only be used for the purpose of the annual plan process. The information will be held by the Horowhenua District Council, 126 Oxford Street, Levin. You have the right to access the information and request its correction.

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Phone to:
(06) 366 0983

Submissions must be
provided to Council
by no later than
**5:00pm on Monday,
10 April 2017**

Contact Details: (You must provide your contact details for your submission to be considered)

Title (e.g. Mr/Mrs/Miss/Dr): MS

Full Name: CHERYL TYLER

Name of Organisation: N/A

Address for service:

LEVIN

Post code: 5510

Telephone: 06 367 5301

Mobile: 0278183098

Email: cheryl.tyler@slingshot.co.nz

Timing of Submission: (please indicate your preference)

Do you wish to present your submission to Council at a Hearing? Yes No

Sign language interpretation required? Yes No

If YES then would you prefer to speak on – Wednesday 3 May OR Thursday 4 May

Would you prefer to present your submission in the – Daytime OR Evening

Note: it is not guaranteed that every submitter will get their preferred time to present.

TOPIC 1: SHARED PATHWAYS

Tick below to identify your preferred option

<input type="radio"/> Status Quo – work within existing budget	
<input type="radio"/> Allocate \$100,000 to shared pathways for 2017/18	
<input checked="" type="radio"/> Allocate \$250,000 to shared pathways for 2017/18	✓

Reasons why this is your preferred option (continue on last page if necessary)

I think we should make more of the outdoors with more walking/biking pathways to encourage people to get out more and to bring in more tourists to enjoy what we have.

TOPIC 2: HOUSING INCENTIVES FOR RENTING

Tick below to identify your preferred option

<input type="radio"/> Status Quo – Provide no funding	
<input type="radio"/> Allocate \$50,000 per annum	
<input checked="" type="radio"/> Allocate \$100,000 per annum	✓

Reasons why this is your preferred option (continue on last page if necessary)

Levin has a great history and we should embrace it more. The increase to rates is minimal but the improvements could be significant.

TOWN 3: SIGNIFICANCE AND ENGAGEMENT POLICY

Tick below to identify your preferred option

Status Quo

Adopt the draft Significance and Engagement Policy

Update the draft Significance and Engagement Policy following feedback from the community and adopt it



Reasons why this is your preferred option (continue on last page if necessary)

ADDITIONAL COMMENTS

Please identify any additional comments you have on what is proposed as part of Council's Draft Annual Plan 2017/18

I'd like to see more engagement with the community. At the moment it the squeaky wheels that get listened to. It would be good to see a proactive and visible council out finding out what the rest of the community is interested in.

WHAT OTHER PROJECTS OR IDEAS SHOULD COUNCIL BE CONSIDERING FOR
2024/25 AND BEYOND

(refer to page 11 to see the list Council is currently focusing on. Do you agree with what we have identified? What else could we look into?)

Please, please do something with the lake. What a fantastic place going to waste. We have to see walks around the lake - picnic spots - clean water an outdoor hydroslide - a cultural centre - make the place a draw card for the region.

Privacy Act 1993

Please note that submissions are public information. Information on this form including your name and submission will be made available to the media and public as part of the decision making process. Your submission will only be used for the purpose of the annual plan process. The information will be held by the Horowhenua District Council, 126 Oxford Street, Levin. You have the right to access the information and request its correction.

Tiffany Williams

From: Tephany Bennett <dougandteph@gmail.com>
Sent: Monday, 17 April 2017 5:04 p.m.
To: annual plan
Subject: ANNUAL PLAN 2017/18
Attachments: IMG_0396.JPG

Follow Up Flag: Follow up
Flag Status: Flagged

Mr
Douglas Stephen Bennett
Private submission

Tele 06 3238402
Email dougandteph@gmail.com

I do not wish to attend a hearing.

Re - Cemetery bounded by Mako Mako Street - Row 40

I make a submission to have an extensive plant growth removed from the end of row 40. This growth covers approximately 6 or 7 graves.

I suggest an allocation in the Reserves and Cemeteries section of the Annual Plan to have this creeping weed removed.

Background to this submission.

I have been attending the grave of my great grandparents (Nicholas) for a number of years and the adjoining overgrowth has been increasingly spreading in this area. I have spoken to the Council's Reserves Manager about this problem and my visit yesterday 16th April 2017 shows only a minimum of trimming on the edges has been undertaken.

I apologize for this late submission, but with my visit today, I feel this matter needs urgent consideration. On looking at the the Annual Plan Notice on your website I found that submissions closed on Monday 10th April.

I ask that this late request receives your earnest consideration.

Signed D.S. Bennett

I attach a photo of the problem.

This email supercedes previous correspondence as I had problems with the emails yesterday.