From: Chiltern Hills

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Ecan Annual Plan 2022/23 Submission 3 April 2022

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Hearing: I wish to speak

We own a dry land store stock farm of approximately 1000Ha of medium to steep hill country in Omihi, North Canterbury (which includes 30Ha of QEII covenants).

The planned overall rates rise is diabolical and if these proposed huge rate rises go through they will never come down again. I wish I could go out and come up with a wish list and get others to pay for it.

If Ecan wants to do everything on its wish list, you as Councillors, need to increase the proportion of the rate take from the UAGC. In the minutes of the Long Term Plan Deliberations meeting of 20 May 2021 it is noted that the CE undertook a review and recommended a UAGC of \$140.94 per rating unit (p12, ltem 15.2) yet the majority of Councillors voted for a charge of only \$43.49 (plus Civil Defence). This means that rural property owners disproportionally pay more in rates than urban ratepayers due to generally higher capital values. To rub salt into the wound when council staff were analysing the submissions the standard comment when submitters objected was "Council is proposing to set the UAGC at a relatively low level as capital value is considered to be a more equitable basis for a land tax principle. Council considers higher capital value properties will be generally better able to bear the cost of a proportionally higher general rate". That is grossly unfair. Many Councillors justified the vote by saying that a large increase in the UAGC would disproportionally affect lower income rating units, yet there is rates assistance through the government's rate rebate scheme.

In the interests of fairness for all, both urban and rural ratepayers, Ecan should be using the maximum allowable UAGC percentage take for rates. Property values, especially rural, do not correlate to incomes and ability to pay. More items should be funded by UAGC.

Ecan staff and councillors need to seriously re-examine the current and future years budget plans to ensure that the work proposed is totally necessary and undertake reasonable cost/benefit analyses, and not just work on a wish list.

Ecan needs to seriously look at the efficiencies of its internal processes to ensure that staff work and engage honestly, pragmatically and with integrity with ratepayers. For example; several years ago Ecan covertly mapped supposed wetlands on rural properties from satellite imagery data and created a publically available database without informing landowners. Another was when the Regional Pest Management Plan was reviewed in 2017, where numerous farmers submitted on nassella stating that the annual grubbing time cut off date should be more flexible for harder hill country, but the submissions were all ignored by Ecan staff when they produced their recommendations. Due to issues that arose over the 2017 nassella season Ecan then engaged in an expensive co-design process for nassella control, when the existing rules are adequate as long as though they are enforced

pragmatically. Consenting processes, costs and delays are other issues seriously affecting rural ratepayers.

For example, our farm has been on the receiving end of heavy handed Ecan staff actions. On standing up against the actions, which included Ecan reneging on an agreement, Ecan undertaking a seriously deficient tender process involving among other things a serious conflict of interest (PWC investigated the process at ratepayers expense, costing about \$15000, but unfortunately did not examine a very suspect scoring process which resulted in the most expensive tender who provided no evidence of having undertaken that type of work, winning the tender), Ecan trying to shut down communication numerous times etc., Ecan has caused our family a lot of unnecessary stress and grief. The total cost to ratepayers of this totally unnecessary issue will be well in excess of \$50,000 to date and has still not been resolved. How many other such issues are festering away at ratepayer's expense?

Regarding Topic 3 the proposed future levy for climate change, I am not in favour of yet another levy. Ecan should be more than capable of undertaking any relevant suggested projects from within its planned budget.

There is mention of managing on farm emissions on p25 of the consultation document. The majority of on-farm dry stock farm CO2 equivalent emissions are from methane. On our farm this is about 75% using the Beef and Lamb carbon calculator. Methane breaks down to CO2 with a half-life of about 12 years, and is basically gone after 20 years. The majority of this biogenic methane is from 'recycled' carbon (grass- animal- methane- CO2-grass), it is not 'mined' carbon such hydrocarbons, coal etc. As stock numbers in New Zealand are slowly decreasing, so to are overall biogenic methane emissions. Due to the large drop in sheep and beef numbers from the late 1970's and only a significantly less increase in dairy cow numbers, the overall stock units farmed in New Zealand have decreased by about 30% with the consequent decrease in biogenic methane. Even with methane included our property is still carbon positive, ie we are sequesting more than we are emitting.

Ecan should join forces with all other regional and local councils to strenuously lobby central government that the more rules they place on local government the more money they are sucking out of the productive economy, especially pertinent in the current situation. Ecan by statute has to write numerous plans, which by the time they have gone through all the consultation stages are generally out of date, as by then new central government rules have come into force. The RMA is being reviewed and I understand that will affect all plans already written, which will be another central government cost imposed on ratepayers.

In summary:

- The percentage of rates obtained by the UAGC should be significantly increased
- Ecan needs to seriously look at its internal processes
- Ecan should not impose a further levy for climate change
- All regional councils need to pressure central government to reduce compliance costs from poorly drafted legislation

Thank you.

H R Turnbull