

Response ID	5657262
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Are you submitting on behalf of an organisation, association or community group?	Yes, I'm submitting on behalf of an organisation, association or community group
Name of organisation, association or community group	Whiterock Consulting Ltd

Supporting your submission

Anyone can make a submission. All submissions will be considered by Council in accordance with our submissions policy before they make a decision.

You can upload documents to support your submission. Please make sure each page includes your name. The maximum file size is 200MB	https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/7b4383253dc8b561d798cb47c2e4292b15a734ae/original/1713389163/2005e8d53f69b0fe50437e7ffdcccd3d_F_Ambury_LTP_submission.docx?1713389163 See Upload File 1 section.
You can upload documents to support your submission. Please make sure each page includes your name. The maximum file size is 200MB	See Upload File 2 section.
If you would like to give feedback via a video, add a link to YouTube or Dropbox file below	See Upload File 3 section.
If you wish, you can also come to talk to Council about your submission at public sessions that are known as 'hearings'. Do you want to speak to Council about your submission at the Long-Term Plan hearings?	Yes
Please provide your phone number so we can contact you to schedule a hearing time	0274804883
Which age category are you in?	

Environmental Regulation and Protection

We are Canterbury's environmental regulator. We are responsible for managing natural resources including air, soil, water and land. We work with mana whenua, stakeholders, and communities to promote the sustainable management of these natural resources, and protect and enhance the health of our natural environment.

Question	Answer
We are proposing three options for funding our Environmental Regulation and Protection services. Please indicate which option you prefer	
Tell us more about the option you chose. What would you support and what would you suggest we change or do differently for Environmental Regulation and Protection?	

Targeted rate for Christchurch district biodiversity

We are proposing to fund more work to improve indigenous biodiversity outcomes in Christchurch and Banks Peninsula through a new targeted rate to properties in those areas.

This would be in addition to the work already funded through the existing regional rate. \$1million for this additional work is already included in Council's preferred option for Environmental Regulation and Protection services.

This equates to rates of 72 cents per year per \$100,000 of your property value.

If there is sufficient support for this new targeted rate, Council could decide to include this targeted rate regardless of whether Option 2 is ultimately accepted.

Question	Answer
Do you support this new biodiversity targeted rate?	
Tell us more about why you support / don't support this biodiversity rate?	

Community Preparedness and Response to Hazards

We support the community to be prepared for, and be able to respond to hazards, and to be prepared for changes in the natural environment.

Question	Answer
We are proposing three options for funding our Community Preparedness and Response to Hazards services. Please indicate which option you prefer	
Tell us more about the option you chose. What would you support and what would you suggest we change or do differently for Community Preparedness and Response to Hazards?	

Targeted rate for Selwyn district for river resilience

We are proposing a trial in the Selwyn district to carry out additional flood and river resilience activities.

Existing schemes do not change.

The cost for this additional work will be through a targeted rate to all properties in the Selwyn district. \$200,000 for this additional work is already included in Council's preferred option for Community Preparedness and Response to Hazards. This equates to rates of \$7.08 per rate-paying property in Selwyn district in 2024/25 (Year 1).

Question	Answer
Do you support a new river targeted rate in Selwyn?	
Tell us more about why you support / don't support this river rate	

Public Transport

We provide urban bus services within the Canterbury region, and ferry services in Christchurch.

We do this because public transport increases accessibility, connects communities and contributes to significant environmental benefits such as reduced greenhouse gas emissions, better air quality, and improved travel times across the transport network.

Question	Answer
We are proposing three options to fund Public Transport services. Please indicate which option you prefer	
Tell us more about the option you chose. What would you support and what would you suggest we change or do differently for Public Transport?	

Fees and Charges schedule

In order to make our consent-related costs more transparent, we are proposing a move towards a fixed-fee approach for some of our consenting work.

There are a number of benefits to this for our community including certainty of invoice amount, more timely invoicing, removing the need for a deposit and standard site visit costs will be built in.

Question	Answer
Do you agree with this new fees and charges proposal?	
Tell us more about why you support / don't support this approach. What would you support and what would you suggest we change or do differently?	

Uniform Annual General Charge / Uniform Annual Charge (UAGC/UAC)

UAGC/UAC are flat charges that are applied at the same amount for every property, no matter the value of your property. We currently charge ratepayers \$54.49 (in the 2023/24 year) for a range of services funded by UAGC or targeted UAC. This income represents approximately 8% of the total amount of money we collect from rates.

Council's preferred option is to set the UAGC and UAC charges to approximately 8% of total rates each year of the Long-Term Plan. This means as rates rise in the future, the value of the UAGC/UAC component of rates will also rise.

Question	Answer
Which Uniform Annual General Charge/Uniform Annual Charge	

(UAGC/UAC) rate increase would you support?	
Tell us more about the option you chose. What would you suggest we change or do differently?	

Strategies and policies

Question	Answer
We'd value your feedback on any of these strategies and policies	
Tell us what you think about the Financial Strategy	
Tell us what you think about the Revenue and Financing Policy	
Tell us what you think about the 30-Year Infrastructure Strategy 2024-54	
Tell us what you think about the Engagement, Significance and Māori Participation Policy	

Upload File 1.

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I completely agree with Andrew's email. I am disappointed to have missed the consultation period for the proposed changes to the consenting fee structure and would also be happy to discuss why the proposed new 'fixed fee' is not suitable and in my opinion will result poorer outcomes to the environment. My main concern is around a property owners ability to afford to upgrade a failing wastewater system where a consent is triggered by the upgrade. If it is too expensive then they will look to alternative options to create a 'cheap fix'. This is often digging a new boulder hole.

I am also concerned that clients who engage suitably qualified and experienced engineers like Andrew and I will not benefit from our long experience in the industry and detailed reporting, design and assessment of effects on the environment. Our consulting fees are higher than designers with less experience. The Australian/New Zealand standards requires on-site wastewater designers to be 'suitably qualified and experienced' but there is no formal definition around this and the Canterbury Regional Council has no register of suitably qualified and experienced designers or means of confirming if a design has been undertaken by a suitable qualified and experienced designer. This results in people with varied, or no experience, presenting designs and preparing poor quality consent applications.

Regards,
Fiona

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