

2024-2034 Long-term Submissions

Submitters to be heard

**SUBMISSION BY MERIDIAN ENERGY LIMITED TO THE DRAFT
ENVIRONMENT SOUTHLAND REGIONAL COUNCIL 2024–2034 LONG
TERM PLAN AND THE RATING REVIEW 2024 STATEMENT OF
PROPOSAL**

To: **Chair & Councillors**
Environment Southland
Private Bag 90116
Invercargill

consultation@es.govt.nz

Name: Meridian Energy Limited

PO Box 2146

CHRISTCHURCH

Attention: Andrew Feierabend

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Meridian Energy Limited (Meridian) makes the following submissions on the consultation document "Investing in Southland Whakangao ki Murihiku" including the supporting Rating Review 2024 Statement of Proposal and related financial documentation for the 2024-2034 Long - term Plan as set out in the **attached** document.

Meridian would like to be heard in support of its submission.

For and behalf of Meridian Energy Limited



Signature

Dated this 6th day of May 2024

Submission by Meridian Energy Limited to Environment Southland on the Rating Review 2024 Statement of Proposal

Overview

- 1 Meridian Energy Limited (Meridian) is a limited liability company listed on the New Zealand Stock Exchange, with 51% of the company owned by the New Zealand Government.
- 2 Meridian's core business is the generation, marketing, trading, and retailing of electricity and the management of associated assets and ancillary structures in New Zealand.
- 3 Meridian owns and manages the Manapōuri Power Scheme (**MPS**) which is located in the Waiau catchment within the Southland Region. There are three primary components of the Power Scheme: the power station located in the West Arm of Lake Manapōuri, the Te Anau Lake Control Structure located at the outlet of Lake Te Anau, and the Manapōuri Lake Control Structure located at the confluence of the Mararoa River and the Waiau Arm of Lake Manapōuri.
- 4 On average, the MPS contributes approximately 13% of NZ's annual electricity generation, approximately 5000 GWh.
- 5 Each component of the MPS is separately valued for rating purposes. They have a combined capital value of \$872 million. The Manapōuri Power Station makes up \$776 million of that value.

Submission

- 6 The MPS has the highest capital value of any rateable asset in the region. This means the proposed flood protection infrastructure rate based solely on capital value disproportionately impacts on Meridian. In other words, based on the MPS's high capital value, Meridian would be required by this proposal to fund a large proportion of this regional rate.
- 7 The change from the previous catchment-based approach to a region-wide rate using capital value as the tool for calculation is permissible. However, any rate must still be fair and equitable, and must reasonably apply the criteria of the applicable legislation, including consideration of how exacerbators and benefitters pay. In this regard, Meridian seeks two decisions from Environment Southland. These are:
 - (a) To reflect the disproportionately high capital value of the MPS assets, Meridian seeks application of a differential of 0.50 as an electricity generator, or other differential factor that creates a level of

reasonableness, transparency, and equity between industry contributors to the rate.

- (b) That the funding raised adequately provides for the proper maintenance of the Waiau Catchment with respect to river management and erosion control.

Reasons

- 8 The Rating Review 2024 Statement of Proposal consistently identifies that the proposal is to create a new flood protection infrastructure rate based on capital value to replace the existing 140 catchment rates. The consultation document consistently identifies that the 140 existing catchment rates will be discontinued. Page 18 of the Statement of Proposal states:

'As the flood protection infrastructure rate replaces the current 140 catchment rates we will cease collecting these rates.'

- 9 Other consultation material repeats the core message consistently that the proposal replaces existing rates. Meridian relies on the public statements regarding this proposal. It is unequivocal that catchment rates will be discontinued and that this proposed region-wide rate would not be applied in addition to the existing catchment rates. Meridian supports discontinuing collection of catchment rates as part of this proposal. Meridian also supports all financial reserves acquired from a catchment to be spent in that catchment in future.
- 10 This is important to Meridian because if the Lower Waiau catchment rate were still to be collected and the region-wide rate were to be applied in addition, Environment Southland would be seeking to collect rates twice for the same work. That would amount to double dipping and be unlawful and invalid. Meridian has no issue in principle with moving the basis of rates collection to a region-wide rather than a catchment-based approach. There are possible efficiencies for Environment Southland to do so.
- 11 However, Meridian's support is based on ensuring there is provision of a funded work programme in the Waiau Catchment that ensures river fairway maintenance and erosion control works. Meridian is aware the Council has developed a works programme for erosion management in the Lower Waiau River but has been reluctant to give effect to it. It is imperative this work programme be appropriately funded in the Long-term Plan via the new rating policy.
- 12 Currently Meridian pays a contribution in relation to the Lower Waiau catchment in accordance with an agreement entered into between

Environment Southland, Federated Farmers and ECNZ (now Meridian) in 1996 when the MPS was last consented. The new proposal will effectively replace the rating basis applicable and pursuant to that agreement. It cannot be both.

- 13 Because of the MPS's disproportionately high capital value, Meridian seeks application of a differential of 0.50 as an electricity generator, or such other differential factor that creates a level of reasonableness, transparency, and equity between industry contributors to the rate. This is needed to reduce its proposed rate to a more appropriate level to reflect the MPS's high contribution to the overall region-wide rate from a facility which is remote from the rest of the region, and which is not otherwise a region-wide exacerbator or benefiter from the rating activity. Even after applying a 0.5 differential, the MPS would still be required to make a substantial contribution to region-wide flood protection work. It is also noted that over the life of the Long-Term Plan the proposed flood protection infrastructure rate increases as the works programme is increased.
- 14 In the absence of such a differential, the MPS is disproportionately contributing to the region-wide flood protection work. Without a differential, bare capital value distorts this because the MPS is the highest capital value rating unit in the district.
- 15 Meridian wishes to be heard in support of its submission.
- 16 Thank you for considering this submission.

Waiau Catchment Liaison Committee

SUBMISSION TO ENVIRONMENT SOUTHLAND ON THE PROPOSED 2024 LONG TERM PLAN

Preamble

1. This submission presents the position of the Waiau Catchment Liaison Committee on key aspects of Environment Southland's Long Term Plan (LTP) as they are likely to impact on the lower Waiau catchment.
2. This submission focuses on the:
 - a. The unique position of the catchment where the generator (Meridian Energy Ltd) permanently diverts from the catchment around 95%¹ of the natural flow from the lower Waiau River for the purpose of hydro electric generation through its west Arm Power Station and discharges the spent water as a contaminant² into Doubtful Sound.
 - b. The 1990-1996 Waiau Working Party consultation process and the resulting 1996 suite of resource consents for the Manapōuri Power Scheme³.
 - c. The specific resource consent that allows the damming and diversion of the lower Waiau River⁴.
 - d. The contemporaneous drafting of the Waiau Agreement 1996⁵ between:
 - Environment Southland
 - The Waiau Community (represented by Federated Farmers Southland)
 - The then owner of the Manapōuri Power Scheme, ECNZ, but now Meridian Energy Ltd
 - e. The execution of the Waiau Agreement 1996
 - i. creation of the Waiau Special Rating District
 - ii. the annual (CCI indexed) annual contribution from the Generator to fund the annual works programme and provision for the creation of reserves
 - f. The implications of the rating changes proposed within the LTP for the on-going management of the Lower Waiau River within the purview of the Waiau CLC and within the terms of the 1996 Waiau Agreement.

Waiau Agreement 1996 – how it works

3. The Waiau Agreement became operational upon the creation of the Waiau Special Rating District and once that District had accumulated rates of at least \$10000pa.

¹ Cite Environment Court evidence – See schematic of the MPS Appendix 1

² Cite Environment court transcript of evidence -

³ See ABF Feierabend Evidence to the Environment Court on behalf of Meridian Energy Ltd

⁴ Resource Consent 96022 – attach full wording – Appendix 2

⁵ Waiau agreement 1996 – Appendix 3

The District was established through the inclusion of the following existing catchment rating schemes:

- a. Sharpridge
- b. Orauea
- c. Fenhem
- d. Lillburn

4. Once the rates target had been achieved the first annual contribution to the works programme overseen by the Waiau Catchment Liaison Committee, was released by the Generator to fund the agreed works.
 - i. Maintenance of an effective flood channel in the Waiau riverbed from the Mararoa Weir to the River's mouth
 - ii. Maintenance of the berm fence (which runs from Te Waewae Bay to the Mararoa Weir⁶).
 - iii. Maintenance of the corridor through which the the berm fences pass in a state free of undesirable plants.

Southland Regional Rates Structure

5. Within the whole of Southland the following targeted rates are land value based
 - Land Sustainability
 - Biosecurity
 - Catchment (various including drainage)
6. The lower Waiau catchment has all of these land value rates.
7. The rates which fall under the heading "Catchment" rates are specifically the drainage rates applying to
 - Sharpridge
 - Orauea
 - Fenham
 - Lilburn
 - Clifden
8. These are the rates which comprise the "local share" of the Waiau Special Rating District which was established under Clause 7.3 of the 1996 Waiau Agreement (See Appendix 3).
9. Should the basis of rating change, as proposed under the LTP, from Land Value to Capital Value, and the Waiau's Catchment Rates be merged into a Region-wide

⁶ The Mararoa Weir is also know as the MLC – the Manapōuri Lake Control structure. It is sited immediately downstream of the confluence of the lower Waiau River and the Mararoa River. Through the operation of the flood gates within the MLC, Meridian Energy Ltd is able to divert waters of the Mararoa River into either Lake Manapōuri or the lower Waiau River and to elevate the level of lake Manapōuri.

“Flood Protection and Infrastructure” Rate, we are concerned that the purpose of the Waiau Special Rating District would have changed. That change would be sufficient to undermine the validity of the Special Rating District as provided for within the 1996 Waiau Agreement. As such, the LTP rating proposals as they apply to the lower Waiau catchment, would undermine the funding mechanism which has provided for the annual works programme on the lower Waiau River since 1996 and has allowed through careful oversight of the programme of works by the Waiau CLC, the accumulation of \$1.4 million in disaster reserve and \$0.8 million in a special projects fund.

10. That outcome, we submit, would be to the significant detriment of the on-going management of the lower Waiau River, and is an unintended consequence of the LTP proposals which must not be allowed to occur.

An Alternative Rating and Reserves Prescription

11. The equity argument in favour of a change in rating basis from Land Value to Capital Value in a general sense is compelling. However in the case of the Lower Waiau catchment, the unintended cost would be too great. Instead we recommend to Council that while the current consenting provisions for the MPS remain and with them the 1996 Waiau Agreement remains valid the current Land Value basis of rating for the Drainage rates which comprise the Waiau Special Rating District, should remain unchanged.
12. Further we recommend that the reserves accumulated through the levying of each of those constituent drainage rates should remain within the purview of those local areas and the accumulated disaster reserve and the special projects fund must remain separately identified and accounted for under the purview of the Waiau Catchment Liaison Committee.

Catchment Liaison Committees and accumulated reserves

13. In common with other Catchment Liaison Committees (CLC). The Committees' purposes are to
 - a. approve annual budgets and operations programs,
 - b. advise on capital works activities
 - c. otherwise discuss rating and all other matters affecting river works and drainage.

The CLCs' provide a pivotal connection between Environment Southland (ES) staff and the catchment communities the CLCs serve.

14. The Waiau CLC has these functions ⁷ . In addition, the Waiau CLC provides a formal structure within which the three parties to the 1996 Waiau Agreement can represent their specific interests.
15. The Environment Court⁸ determined that CLCs were committees of Council. We are never-the-less concerned that the proposed in the LTP, the proposed Policy - Financial Reserves , section 3 – Principles and Objectives, does not explicitly require Council to have regard to the process by which reserves were accumulated nor consider the purpose for which the reserves exist. Instead the Principles and Objectives appear to provide Council with *cart blanche* in the use of all reserves held by it, provided the tests of prudence, transparency and accountability are met.
16. We submit that with respect to reserves accumulated by local communities for a specific purpose, those monies are effectively held in trust by Council on behalf of that specific community. It is that relationship that is missing from the draft LTP – Financial Reserves Policy.

Recommendations

17. The specific recommendations from the Waiau Catchment Liaison Committee on Environment Southland's proposed Long Term Plan are that the Hearing Panel:
- i. Note that the Waiau Agreement 1996, which provides in excess of \$420,000pa to fund the annual works programme on the lower Waiau River, will be voided, should the proposed Capital Value Rating basis be extended to include the constituent drainage rating districts that provide the local share required under the 1996 Waiau Agreement, for the Waiau Special Rating District.
 - ii. Recommend to Council, that the basis for the drainage rates which together constitute the Waiau Special Rating District should remain as Land Value, for as long as the current resource consent framework for the Manapōuri power Scheme remains.
 - iii. Recommend to Council that the accumulated reserves of the drainage rating areas (listed in paragraph 7) together with the Waiau Catchment Liaison Committee's Disaster Reserve and the Special Projects Fund, should not form part of the regional reserves, but should continue to be separately identified within the Council's finances, to ensure that the terms of the 1996 Waiau Agreement are complied with;
 - iv. Recommend to Council the propose LTP policy on Financial Reserves should make explicit the linkage between the communities

⁷ See the Waiau CLC current works programme and reserves positions – Appendix 4

⁸ Hassen: 26 November 2018, reference

which have accumulated the reserves and the purposes of those reserves.

Peter Baker

Paul Marshall

Co – Chairs

Waiau Catchment Liaison Committee.

Appendix 1 – Waiau FMU and the Manapōuri Power Scheme Schematic

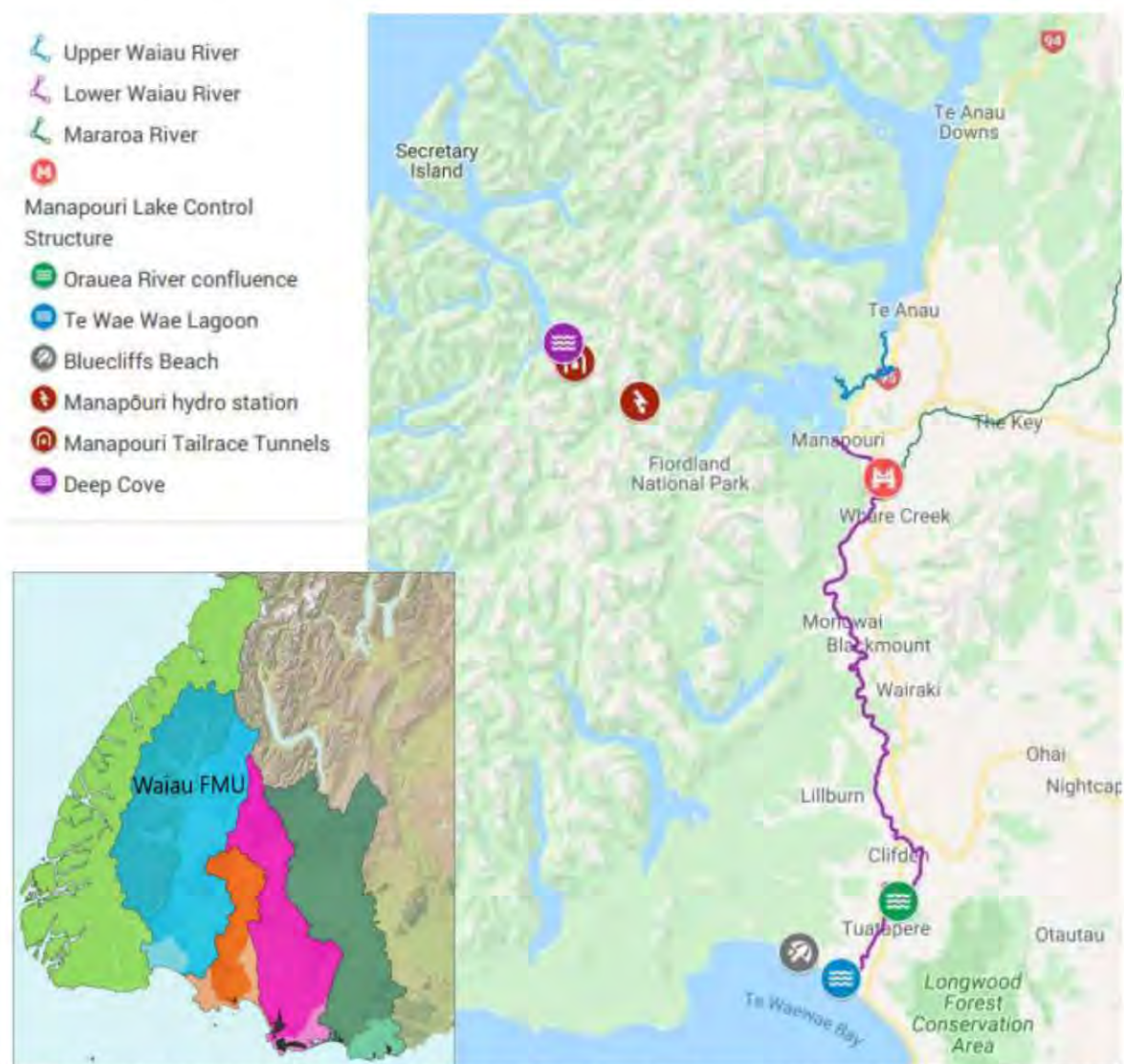


Figure 2: The Waiau Catchment, showing the geographic locations of the various components of the Manapōuri Power Scheme. Note that FMU is Freshwater Management Unit (source: WRG Submission on the NPSFM 2020).

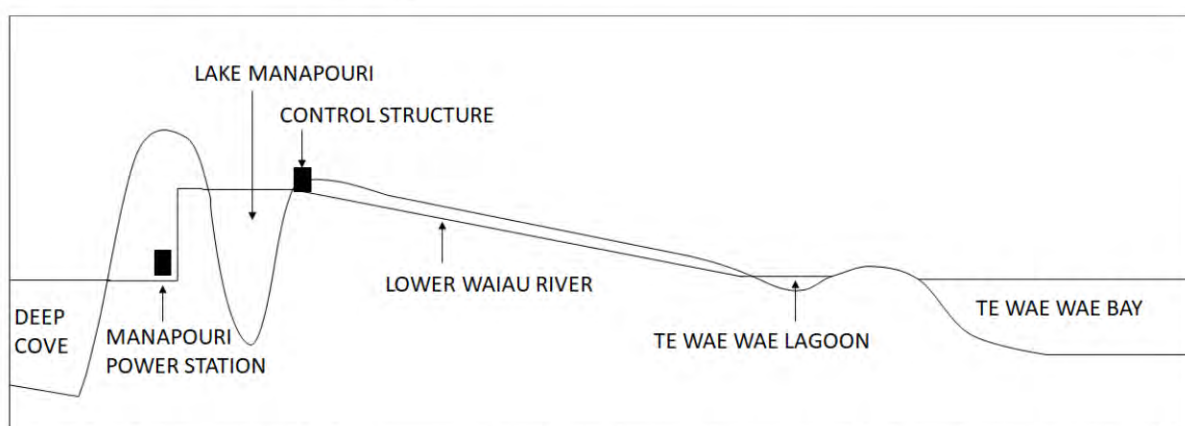


Figure : A schematic of the Manapōuri Power Scheme (source: WRG Submission on the NPSFM 2020)

Appendix 2 – Resource Consent 96022



Application No: M289-005
Consent No: 96022

Cnr North Road and Price Street
(Private Bag 90116)
Invercargill

Telephone (03) 211 5115
Fax No. (03) 211 5252
Southland Freephone No. 0800 76 88 45

Water Permit

Pursuant to Section 105(1) of the Resource Management Act 1991, a resource consent is hereby granted by the Southland Regional Council to **Meridian Energy Ltd** (the “consent holder”) of P O Box 2454, Christchurch from 19 December 1996.

Please read this Consent carefully, and ensure that any staff or contractors carrying out activities under this Consent on your behalf are aware of all the conditions of the Consent.

Details of Permit

Purpose for which permit is granted:	To dam and divert the waters of Lake Manapouri and the Waiau and Mararoa Rivers by means of a structure (with a crest level of 179.25 metres above m.s.l.) near the confluence of the Waiau and Mararoa Rivers, and to dam and divert the waters of the Mararoa River to an artificial diversion channel
Location	- site locality - - map reference - - receiving environment - - catchment -
Legal description of land at the site:	River bed
Expiry date:	28 November 2031

Consent Amended

Conditions amended on August 9, 2000, November 6, 2002, 30 August 2004, 25 February 2011 and on 25 July 2012, as follows:

Schedule of Conditions

1. Operating Guidelines

The Consent Holder shall comply with Guidelines for the operation of Lake Manapouri contained in the Manapouri-Te Anau Development Act (Operating Guidelines) Notice 1992 gazetted in the New Zealand Gazette dated 29 April 1992 or any subsequent

amendment thereof or substitution therefore (the "Gazetted Guidelines"), except in exceptional natural circumstances, or where life or structures are endangered, as provided for in Section 4(A)(2) of the Manapouri-Te Anau Development Act 1963.

2. Minimum Flow

Except as provided for in conditions 2.1, 2.2, 3.1 and 3.2 the Consent Holder shall maintain, in the river downstream of the structure, a flow not less than 12 cubic metres per second (cumecs) between 1 May and 30 September, not less than 14 cumecs during October and April, and not less than 16 cumecs at all other times.

2.1 At times other than provided for in condition 2, 3.1 and 3.2, a minimum flow of not less than 6 cumecs shall be allowed for three 10 hour periods, between 1 March to 31 August in any one year only for the purposes of sill lowering at Gate 2 of the Manapouri Lake Control Structure.

2.2 Condition 2.1 shall expire and cease to have any effect from 1 September 2008.

3. Exceptions to Minimum Flow Condition

3.1 During the first twenty four months following the date of the grant of consent, the Consent Holder shall not be obliged to comply with Condition 2 but shall, subject to Condition 3.2 provide the flows in Condition 2 to the extent possible within the constraints imposed by the existing gate sill level, the Manapouri lake levels and the flow in the Mararoa River.

3.2 During the first twelve months following the date of the grant of the consent, the Consent Holder shall not be obliged to comply with Conditions 2 and/or 3.1 for such period or periods as are necessary or requisite in order to carry out such works within the stilling basin downstream of the gates as are necessary to enable compliance with the conditions of this consent.

4. Review Clause

At seven yearly intervals from the date of granting, the Council may review the results of all investigations carried out in accordance with Condition 12.

Within 3 months of completing these reviews and/or within 6 months of receiving a report or recommendation that a review take place from the Waiau Working Party, the Council may, in accordance with any Sections 128(1)(a) of the Act, serve notice that it intends to review Conditions 1 to 10 of this consent to deal with any significant adverse effect on the environment which may arise from the exercise of this consent which was not foreseen or reasonably foreseeable at the time of granting, and which it is appropriate to deal with after the results of monitoring have been received.

5. Mararoa Turbid Water

Whenever water in the Mararoa River has a turbidity greater than 30 NTU at the site referred to in Condition 7 the Consent Holder shall discharge from the lake control structure a flow no less than the flow in the Mararoa River measured at the same time.

6. Native Fish Pass

The Consent Holder shall, within two years of the date of grant of this permit, on the Manapouri Lake structure, install, operate and maintain a native fish pass designed and constructed following consultation with the Director General of Conservation and Trustees of Te Waiau Mahika Kai Trust.

7. Records

Within three months of the date of grant of consent, the Consent Holder shall measure and record the turbidity levels and flow of the Mararoa River at "Cliffs" (or such other suitable site as is agreed with the General Manager, Southland Regional Council), at a frequency of not less than once every 60 minutes and shall supply the correlated records to the Southland Regional Council annually.

8. Recreational Flows

The Consent Holder shall release a flow of not less than 35 cumecs for a period of 24 hours, on the fourth Sunday of each month between October and April inclusive or such alternative dates as are agreed with the Southland Regional Council, into the river below the Manapouri Lake Control Structure for recreational purposes provided that any of these two flows may be increased to not less than 45 cumecs as required by the New Zealand Jet Boat Association Southland Branch for specific events.

9. Other Flows

The Consent Holder shall release the following additional flows immediately below the Mararoa Weir, as follows:

One flow per year of not less than 150 cumecs of 24 hours duration during the period March to May inclusive and one further such flow during the period September to November inclusive each year. These flows will be released only if necessary to ensure the mouth of the Waiau River is in the opinion of the General manager, Southland Regional Council, sufficiently open to enable the passage of migratory fish during these periods and the Gazetted Guidelines can be complied with by the release of such flows.

10. Mararoa Trout/Fish Pass

The consent holder shall design, in consultation with the Southland Fish and Game Council, and within three years of the date of grant of the consent, install, operate, and maintain, an effective fish pass which allows the upstream and downstream passage of brown and rainbow trout at the Manapouri Lake Control Structure.

11. Erosion

The Consent Holder shall:

- (a) take such precautionary measures which the General Manager, Southland Regional Council may require to prevent damage from erosion which is likely to occur as a result of the exercise of this permit; and
- (b) make such remedial repairs which the General Manager, Southland Regional Council may require to remedy damage from erosion which occurs as a result of the exercise of this permit.

12. Monitoring

The Consent Holder shall implement the monitoring programme agreed with the Southland Regional Council and attached as Appendix 1 and shall supply a copy of the results to the Council annually.

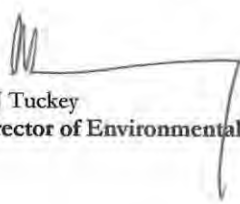
13. Charges

The Consent Holder shall pay to the Southland Regional Council the following user charges which are fixed under Section 36 of the Act:

- (a) an administration charge; and
- (b) a compliance monitoring charge.

User charges are payable, in advance, on receipt of invoice on the first day of July each year.

for the **Southland Regional Council**


W J Tuckey
Director of Environmental Management

Appendix 3 – Waiau Agreement 1996

THIS AGREEMENT dated

1996

PARTIES:

1. ELECTRICITY CORPORATION OF NEW ZEALAND LIMITED a duly incorporated company having its registered office at Wellington ("ECNZ")
 2. FEDERATED FARMERS SOUTHLAND INCORPORATED (with its successors and assigns called "the Farmers")
 3. THE SOUTHLAND REGIONAL COUNCIL (with its successors and assigns called "the Council")
- (together called "the parties")

BACKGROUND:

1. ECNZ operates the Manapouri Power Station under the provisions of the Manapouri Te Anau Development Act 1963 ("MTADA"), and the Resource Management Act 1991 ("RMA").
2. Section 4(1)(a)(i) MTADA provides that ECNZ shall have full power and authority to erect, construct, provide, use and operate all works, appliances and conveniences which may be necessary or requisite for or in relation to the utilisation of water power from the water resources of Lakes Manapouri and Te Anau, and the Waiau and Mararoa rivers and their tributaries.
3. In addition, ECNZ has the power to raise or lower the levels of Lakes Manapouri and Te Anau and the Waiau and Mararoa Rivers and their tributaries which are deemed consents to take and use water under the RMA, subject to operating guidelines, which are deemed conditions of these consents.
4. Subject to the provisos in sections 4A(2) and (5) of the MTADA, this Act allows ECNZ to carry out activities which would otherwise require resource consents under the PO, 4A. However, the RMA deems ECNZ's uses of water to be water, coastal and discharge permits which expire on 1 October 2001. The RMA requires that the application for the permits to continue these uses of water consider inter alia the avoidance, remediation or mitigation of adverse effects on the environment.
5. ECNZ is of the view that, for the renewal of permits of the scope and significance of these, a broad consultation programme is not only appropriate, but essential.

6. To that end, ECNZ initiated the establishment of the Waiau Working Party in April 1990 to study the effects of hydro-electric power generation on the environment*

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July

- 2 -

7. For a period of almost six years, the parties and other members of the Waiau Working Party have held meetings and commissioned a number of reports to consider the environmental, recreational, social, cultural and economic values and opportunities of the Waiau River catchment resource.
8. The Waiau Working Party has identified a series of provisions and conditions which they believe, if applied to the ECNZ's resource consents as conditions where legally possible and others incorporated into binding agreements ("the Agreements"), will provide recognition of the various values and opportunities and mitigate the adverse effects of ECNZ's operations and represent an acceptable outcome by retaining or enhancing the values identified while recognising the importance of the use of the resource for the generation of electricity.
9. By a Heads of Agreement dated the 16th day of July 1996 ("Heads of Agreement") those members of the Waiau Working Party consultation process who sign the document record the conditions they think should attach to ECNZ's resource consents when granted. Those conditions will then be included in a joint submission made by its signatories to the Council when it advertises the applications. The joint submission will ask the Council to adopt the agreed conditions and impose them as conditions on the grant of ECNZ's resource consents.
10. The Waiau Working Party's agreed conditions include one that seeks to prevent erosion, or remedy damage from erosion, which occurs or may occur as a result of the exercise of the permit to dam and divert the waters of Lake Manapouri and the Waiau and Mararoa Rivers by means of a structure known as the "Manapouri Lake Control Structure", as follows:

004.11 Erosion

The Consent Holder shall:

- (a) take such precautionary measures which the General Manager, Council, may direct to prevent damage from erosion which is reasonably likely to occur as a result of the exercise of this permit;
- (b) make such remedial repairs which the General Manager, Council, may require to remedy damage from erosion which occurs as a result of the exercise of this permit,

- 1 1. 11.1 By an Agreement dated 9 March 1973 the New Zealand Electricity Department (now ECNZ) and the Southland Catchment Board (now the Southland Regional Council) ("the Waiau Agreement") the Council is required, at ECNZ's expense:

- a. to conduct regular surveys and take aerial photographs to identify and evaluate channel alterations which have occurred since work on the Manapouri Power Scheme commenced; and
- b. at the request of ECNZ, any landowner, any local body, or on the Council's own initiative, to investigate and assess any matter arising from fluctuations in river flow, and identify possible remedial actions and their cost.

11.2 If ECNZ approves an action recommended by the Council through the mechanism described in 11.1.b of this Agreement, then ECNZ meets the full cost of that work unless the Agreement provides to the contrary.

11.3 If the Agreement does not require ECNZ to meet the full cost of work suggested through the mechanism described in 11.1.b then a sharing of the cost between landowners represented by the Council and ECNZ may occur, with disputes being referred to arbitration.

11.4 In discharge of its obligations under the Waiau Agreement, and as a result of other agreements entered into from time to time with landowners affected by changes in the Waiau River caused by the Manapouri Power Project, ECNZ has funded the costs of the Council in carrying out an agreed annual programme of vegetation control in the Waiau River floodway.

12. There are some values, opportunities and concerns identified by Federated Farmers Southland Inc, representing the adjoining landholders in the lower part of the Waiau River which the Farmers and ECNZ have agreed are better addressed by the provisions of this Agreement than by measures which could be incorporated formally as conditions of the resource consents. This Agreement records those matters, and the agreements reached between ECNZ and the Farmers. Those agreements recognise the importance of the use of the Waiau catchment resource for the generation of electricity, and the mitigation of effects arising from that use for farmers and other landowners in the Waiau catchment.

13. The parties intend that this Agreement and the erosion condition proposed for the resource consents as recorded in clause 10 of the background will:

- a. replace the Waiau Agreement, the 'Council and ECNZ as successors to the signatories of it declare that it will now be cancelled in terms of operative clause 8 of this Agreement; and
- b. continue to have effect (subject to clause 7.2) for a term ending on the date on which the resource consents proposed in the joint submission expire.

14. The New Zealand Electricity Department, and latterly, ECNZ, has accepted

responsibility for the loss of stock access to water occasioned by the need to fence river berms as a result of the lowering of the Waiau River.

THE PARTIES AGREE:

1. Definitions

"Adequate condition" means a fence that provides an effective barrier to stock at every point along its length,

"Agreed Programme" means an annual programme of river flood channel and berm fenceline vegetation spraying to be agreed each year by the parties. The programme shall require handspraying of vegetation along fencelines where the use of other methods would unreasonably interfere with the farmer concerned's normal farming practice.

"Fence" means a fence erected as a sheep and cattle stock barrier, whether or not continuous, and extending along the whole boundary of land contiguous to the Waiau River, and which separates the bed of the Waiau River from the land of adjoining rural land occupiers.

"Repair" means maintaining in an adequate condition and includes the obligation to progressively replace parts of fences as required.

2. The Farmers will join with other members of the Waiau Working Party in making a joint submission to the Council, consenting as effected parties, to the grant of ECNZ's resource consent applications numbers 001 to 007 (inclusive) subject to:

2.1 the conditions proposed for adoption by the Southland Regional Council on the grant of the consents as detailed in Schedule I to the joint submission; and

2.2 the terms of this Agreement.

3. ECNZ will ask the Council to grant its resource consent applications numbers 001 to 007 (inclusive) subject to:

3.1 the conditions agreed and listed in Schedule I of the joint submission; and

3.2 the terms of this Agreement.

4. This Agreement is subject to and conditional upon the Heads of Agreement not being avoided by any of the parties to that Agreement in terms of clauses 5 or 7 thereto.

5. If the Heads of Agreement are avoided pursuant to clause 5 or clause 7 of that Agreement, then:

- 5.1 this Agreement shall be at an end and be of no effect;
- 5.2 the parties shall be relieved of further performance of the obligations undertaken by them under this Agreement;
- 5.3 none of the parties shall have any claim against any of the others arising from any action taken in anticipation of this Agreement enduring; and
- 5.4 the Waiau Agreement shall be revived and shall continue to have effect between ECNZ and the Council according to its terms.

6. Further Agreements

- 6.1 ECNZ shall, provided the Heads of Agreement are not avoided by any of the parties to that Agreement in terms of clauses 5 or 7 thereto and the consents sought are granted:

- a. fund the reasonable costs of the Council in carrying out an agreed programme of annual spraying of vegetation in the Waiau River flood channel from below the Mararoa Weir to the mouth of the river for the purpose of maintaining the efficiency of the flood channel in passing floodwater;
- b. maintain, or fund the maintenance of the fences between the Mararoa Weir and the mouth of the Waiau River erected as a consequence of the Manapouri Power Project in a stock proof condition, and will repair those fences when damaged by flooding, slips or trees falling; and
- c. ensure the Agreed Programme, and the work needed to maintain the fences, shall be detailed in a three year rolling plan to be agreed by the parties. The plan will require that any work not undertaken in any year shall be performed in the following year and financial provision for the same shall be carried forward and added to that succeeding year's work programme.

- 6.2 The parties record to avoid doubt that approximately 100 kilometres of fencing was erected as a consequence of the Manapouri Power Project; and

- 6.3 For the avoidance of doubt, nothing in clause 6 shall require ECNZ to maintain berm fencing on land owned by it (unless the maintenance of any particular length of

fence has been specifically agreed in an annual programme under this Agreement) or on the Tuatapere town floodbank.

7. 7.1 This agreement will continue in force for a term expiring on the date the resource consents referred to in the joint submission expire. If consents in substitution are granted under the Resource Management Act 1991 then the parties will negotiate in good faith the extension of the terms of this agreement on such terms as are then appropriate and the dispute resolution provisions of clauses 9.1 and 9.2 shall apply to the negotiation of such an extension of term.

- 7.2 The obligations of the parties under this Agreement shall be suspended if a special rating district for the Waiau catchment is established for the purpose of discharging the obligations of ECNZ under this Agreement.

7.3 If a special rating district is established for purposes including:

- a. the maintenance of an effective flood channel in the Waiau riverbed from the Maroroa Weir to the river's mouth; and
- b. the maintenance as defined in this Agreement of the fences erected as consequence of the Manapouri power project; and
- c. the maintenance of the corridor through which the fences pass in a state free of undesirable plants;

and once rating income from landowners exceeds \$10,000.00 per annum then ECNZ shall pay to the Council on behalf of the land occupiers represented by the farmers:

- d. the sum of \$200,000.00 a year annually (to be adjusted as provided in clause 7.5 of this Agreement); and
- e. an additional sum at the rate of \$1.00 for every dollar of rates collected from ratepayers in the special rating district.

- 7.4 The Council shall ensure that any money received under this agreement, after payment of all usual administration expenses and lawful charges, is first applied for the purposes set out in clause 7.3 above. Any surplus may be accrued as a capital fund for disaster relief in the Waiau catchment or for such other lawful purposes as the special rating district notice may allow.

- 7.5 All the sums payable under this Agreement shall be increased from year to year by the multiplier the Works Construction Cost Index published from time to time by Works Consultancy Services Limited declares is needed to maintain the purchasing power of money in 1996 dollars. The Index will take effect from 1 July

1996. If Works Consultancy Services Limited ceases to calculate and publish the Works Construction Cost Index then such alternative index shall be used as Works Consultancy Services Limited shall nominate.

8. This Agreement shall be in substitution for the Waiau Agreement which shall cease to have force and effect from the date upon which this agreement comes into force as a result of the grant of the resource consents, upon which event both the Council and ECNZ shall be relieved of further performance of their obligations under the Waiau agreement, and neither party shall have any claim against the other.
9. 9.1 In the event of any dispute arising between the parties in respect of or in connection with this Agreement, the parties shall, without prejudice to any other right or entitlement they may have under this Agreement or otherwise, explore whether the dispute can be resolved by use of the alternative dispute resolution technique of mediation. The rules governing such techniques shall be agreed between the parties or as recommended by the New Zealand Law Society or as selected by the Chairman of the New Zealand Chapter of LEADR (Lawyers Engaged in Alternative Dispute Resolution).

9.2 In the event the dispute is not resolved within twenty eight days of written notice by one party to the other of the dispute (or such further period agreed in writing between the parties), either party may refer the dispute to arbitration under the provisions of the Arbitration Act 1908 or any Act passed in substitution thereof. The arbitrator shall be agreed between the parties within 10 days of written notice of the referral by the referring party to the other or failing agreement appointed by the President of the New Zealand Law Society. In either case, the arbitrator shall not be a person who has participated in any informal dispute resolution procedure in respect of the dispute.
10. Where the land of any farmer contiguous with the Waiau River or one of its tributaries or the profitability of the farm formed by such land is detrimentally affected by erosion caused by the exercise of resource consents held by ECNZ then ECNZ undertakes to negotiate in good faith with the landowner to find measures to mitigate and compensate the effects of such erosion on that farm.
11. Any notice given under this Agreement shall be in writing and delivered or transmitted as follows:
The Company Secretary
Electricity Corporation of New Zealand Limited
Rutherford House
23 Lambton Quay
P O Box 930
Wellington
Telephone: 04 472 3550 Facsimile: 04 473 7091

The Secretary
Federated Farmers Southland Incorporated
70 Forth Street
P O Box 176
Invercargill
Telephone: 03 218 2869
Facsimile: 03 218 2868

Southland Regional Council
Regional House
Cnr Price Street & North Road
Private Bag 90116
Invercargill
Facsimile: 64 3 215 8081

9

SIGNED by the parties on the date set out above.

SIGNED for
ELECTRICITY CORPORATION OF
NEW ZEALAND LIMITED by:

Director} Authorised Person

) X _____ Director
) _____
) _____
) _____
) X _____

Witness: _____

X

Name: _____

Occupation: _____

Address: _____

(Witness required only if deed signed other than by two directors)

SIGNED for
FEDERATED FARMERS
SOUTHLAND INCORPORATED by:

) X _____ Director
) _____
) _____
) _____
) X _____ Director/Authorised Person



Witness: X

Name: _____

Occupation: _____

Address: _____

\\jkg\docs\236(F)
29 July 1996

29 July 1996

or
THE SOUTHLAND REGIONAL

) X _____
) _____
) _____
) X _____



(Witness required only if deed signed other than by two directors)

SIGNED for

COUNCIL

by:

Witness: X Name:

Occupation: _____

Address: _____

(Witness required only if deed signed other than by two directors)

30th April 2024.
Waiau Catchment Liaison Committee.

To
Chair and Councillors of
Southland Regional Council. (ES)

Catchment Liaison Committees (CLC) provide a pivotal connection between Environment Southland (ES) and the Southland's catchment communities. The Committee's purpose is to approve annual budgets and operations programs, to advise on capital works activities and to otherwise discuss rating and all other matters affecting river works and drainage with ES staff.

In this submission the second of two on the LTP we address concerns we have more broadly associated with the proposed Flood Protection and Infrastructure Rate.

In our view, insufficient time has been allowed for public consultation. Submissions close on 6th May and insufficient time has been allowed for discussions within catchments on the implied loss of autonomy, revenues and reserves. Rather than supporting Catchment Liaison Committees (CLC) the proposed rating changes along with the active review of the Terms of Reference create a sense of uncertainty around the future role of CLC's.

More time is needed to address the above concerns and in general the whole process seems very rushed.

The proposed rates increase for the FY24/25 year are unacceptable and we urge council to embrace fiscal responsibility at a time the Reserve Bank is vigorously trying to contain inflation. One approach council might adopt would be to defer for 12 months the proposed 'Flood Protection and Infrastructure Rate'. This would have the effect of lowering the proposed rates rise for FY24/25 and give time for Central Government to clarify its intentions around the 75% contribution that council need to make the proposal work. It would also afford council the time necessary to consult widely with affected communities.

We point out that our communities (Council's ratepayers) are under significant stress from cost of living, poor commodity prices and increases from insurance and interest costs. In our opinion council's consideration of the LTP should be grounded on the affordability of rates proposed. The LTP mentions neither rates affordability nor the consequences on the community of the very large increases in debt the LTP proposes. The Waiau CLC oppose the borrowing of \$73m by 2034 as proposed by council. Borrowing the funds will in reality insure "Intergeneration Debt."

We support the proposed funding of Biosecurity and Land Sustainability by way of a regional capital value rate. (General rate)

Yours sincerely

The Waiau CLC Chairs

Paul Marshall and Peter Baker

Submission to Southland Regional Council Long Term Plan 2024-34

The Future is Rail

c/- Dave Macpherson, saveourtrainsdunedin@gmail.com

Phone: +64 21 477 388

Email: info@allrailways.co.nz

Facebook: <https://www.facebook.com/groups/sotnz/>

Website: <https://allrailways.co.nz>



1. The Future is Rail was established in 2022

- a) It is a nationwide network of groups and individuals supporting passenger rail in New Zealand.
- b) We will harness widespread support for passenger rail, to ensure local and national authorities have passenger rail services (and other rail initiatives) firmly on their agenda.

2. The proposition to Southland Regional Council for the 2024-34 LTP

- a) That the three Regional Councils on the Main South Line (railway line south of Christchurch running from Christchurch to Invercargill) contribute in Year 1 of the Plan by funding
 - i) a scoping study on the re-establishment of a scheduled passenger rail service between Christchurch and Invercargill
 - ii) a scoping study to outline the possibilities of future commuter rail services in the Dunedin and Christchurch areas
- b) The purpose of the scoping studies be to develop a project outline of both types of services, including projected timelines and funding streams/sources that can then be considered by relevant communities, governments and government agencies.
- c) That funding sought for the scoping studies be split evenly between Southland/Otago and Canterbury, charged as a targeted rate to properties within 10kms of likely railway stations, totalling \$172,000

- i) **Southland Regional Council**
 - Invercargill & Gore, 25,000 properties
 - One-off targetted rate of \$0.80 in 2024/5
 - yield = \$20,000 approx

- ii) Otago Regional Council – primarily Dunedin urban area, Oamaru & Balclutha
 - 55,000 properties in catchment
 - targeted rate of \$1.20 in 2024/5
 - Yield = \$66,000 approx
 - iii) Canterbury Regional Council – Funding sought \$86,000
- c) That 51% subsidy be sought jointly by the three Councils from Waka Kotahi/NZTA, from whichever transport initiatives/transport planning/public transport 'pot' of funds seems appropriate. If successful, this will have the effect of halving the contributions sought from regional ratepayers in the three regions, although it is acknowledged that such an approach cannot be relied on to be successful in the current climate.

3. Why should passenger rail be supported?

- a. Passenger rail can deliver on the key regional objectives:
 - i. An enhanced, efficient & accessible mode choice provision
 - ii. A safer form of inter-regional & inter-community transport
- b. It builds affordable connections between communities in our Regions
- c. Passenger rail is the ONLY significant transport mode choice that is not currently offered in our Regions
- d. There is no need for major new infrastructure, as services would be on the existing rail network, which can accommodate both freight and passenger services with reasonable timetabling
- e. Passenger rail has a low carbon emission profile, compared with private, and other forms of public, transport
- f. Inter-regional passenger rail services - when offered as an alternative in the North Island and overseas (eg Australia) – are popular
- g. Investment in modern railcars, or even refurbished rail carriages (eg North Island), can be an efficient means of offering passenger rail
- h. Moderately fast railcar services operate on the same track gauge in Japan (pictured) and Australia

4. What benefits are specific to the lower South Island?

- a. The Main South Line, Christchurch-Dunedin-Invercargill, connects communities comprising 650,000 population
- b. Passenger rail services, on existing lines, provide connections between major urban areas such as Dunedin, Invercargill and Christchurch, and with many rural centres along the network (eg Gore, Balclutha, Oamaru, Timaru, Ashburton).
- c. Commuter routes, such as Mosgiel-Dunedin, and Rolleston-Christchurch are becoming congested, sometimes severely, and railcar-type commuter rail will use existing infrastructure to bypass – and lessen the need for expansion of – existing major road networks.

5. Not one dollar of major Government infrastructure funding proposed for the Main South railway line route

- a. In the Coalition Government's recent announcement of major transport infrastructure projects, not a single dollar has been proposed for the route Christchurch-Dunedin-Invercargill.
- b. With approximately 12% of the New Zealand population in our area, and a major portion of the tourist industry travelling through our area, the Government has short-changed Southland, Otago and Canterbury.
- c. The Regional Council, by advocating for Government support for the initial investigation of passenger rail services in the area, will provide the Government an opportunity to start redressing the transport funding imbalance.

6. What could a *Southerner* timetable look like?

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7. Recent passenger rail developments in NZ

- a. Contracts to buy new hybrid trains for Capital Connection & Wairarapa Connection (Manawatu, Wairarapa & Wellington)
- b. Expansion of successful Te Huia service between Hamilton & Auckland
- c. City Rail Loop in Auckland (underground connection for Metro services)
- d. Northern Explorer (Auckland-Wellington) service again stopping in Taumarunui
- e. Study into central North Island service connecting Te Huia & Capital Connection (Hamilton-Palmerston North)
- f. NOTE: these are ALL in the North Island

8. Targets for CO2 & other greenhouse gas emissions

- a. Environment Southland: net zero CO2 emissions by 2050
- b. Dunedin City Council: net zero emissions of carbon dioxide and other greenhouse gases by 2030 (except methane)
- c. Otago Regional Council: cannot find
- d. New Zealand Govt: (supported by new National-led Govt) net zero CO2 emissions by 2050
- e. **It's not enough just to have a policy – what actions will ensure this?**

9. We have asked the Otago-Southland Regional Transport Committee the following:

- a. That the RLTC agree, by insertion into its Regional Land Transport Plan, to include 'Passenger Rail' as a future transport mode to be provided within the regions, and connecting to Canterbury.
- b. That the RLTC agree, by insertion into its Regional Land Transport Plan, to:
- c. conduct a study into the feasibility of an inter-regional rail service from Dunedin-Christchurch, funded via the public transport system
- d. Work with Canterbury Regional Council to achieve this.
- e. That the study inform future Public Transport plans for the Otago and Southland regions
- f. *[RLTC submission attached to this submission]*

We wish to speak in person (possibly via Zoom/Teams) in support of this submission.

Dave Macpherson

On behalf of 'The Future is Rail'

c/- SaveOurTrainsDunedin@gmail.com

021-477 388

Save Our Trains

Submission to
Otago/Southland
Regional Transport Committee
Regional Land Transport Plan Review 2024



The Future Is Rail.

Ōtepoti-Dunedin

Save Our Trains Ōtepoti-Dunedin

➤ Established August 2023

- A group of Ōtepoti/Dunedin residents promoting & supporting passenger and other rail initiatives in the Dunedin area, in the South Island, and nationwide.
- Part of a nationwide network of groups and individuals supporting passenger rail in New Zealand.
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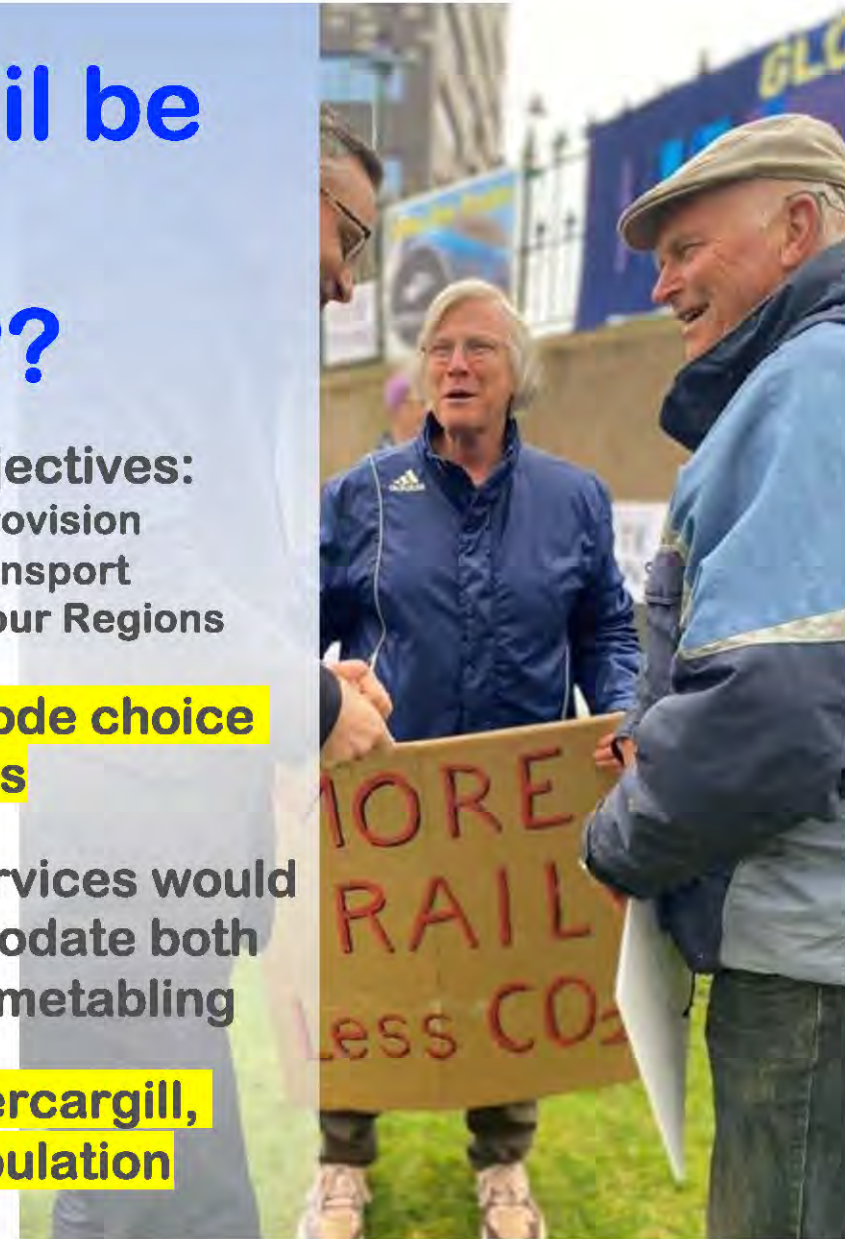
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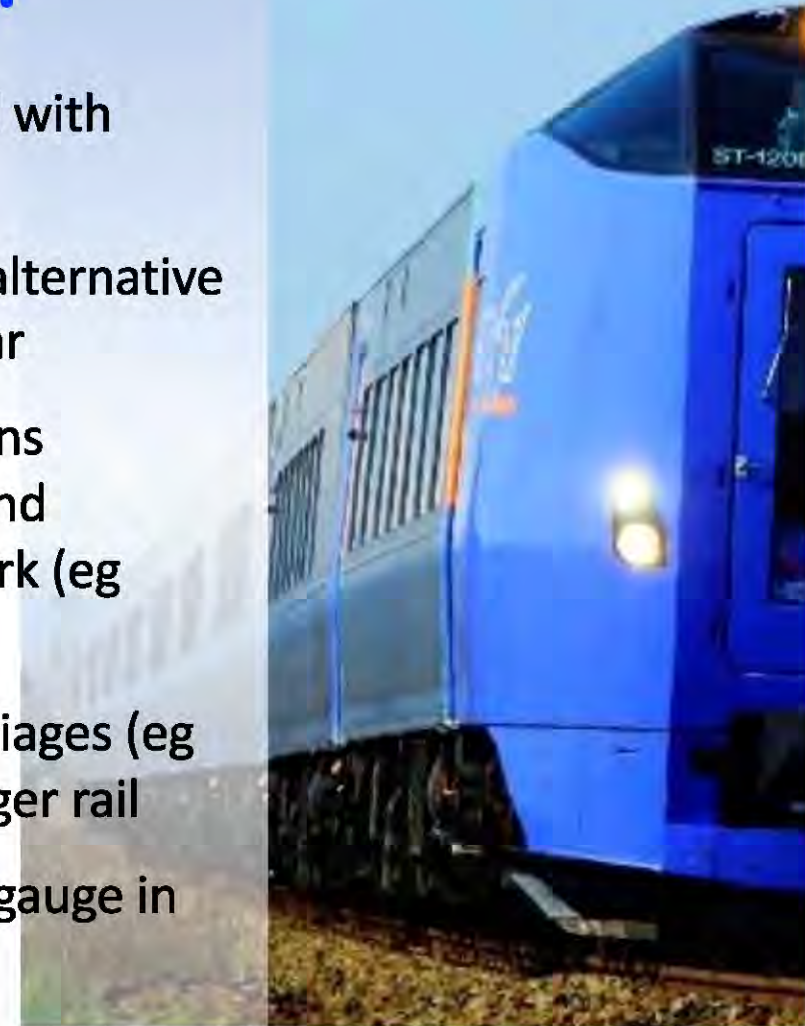
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- Moderately fast railcar services operate on the same track gauge in Japan (pictured) and Australia



What *The Southerner* service could look like

- Indicative timetable & stops based on 1990s Southerner – could be faster with new trains
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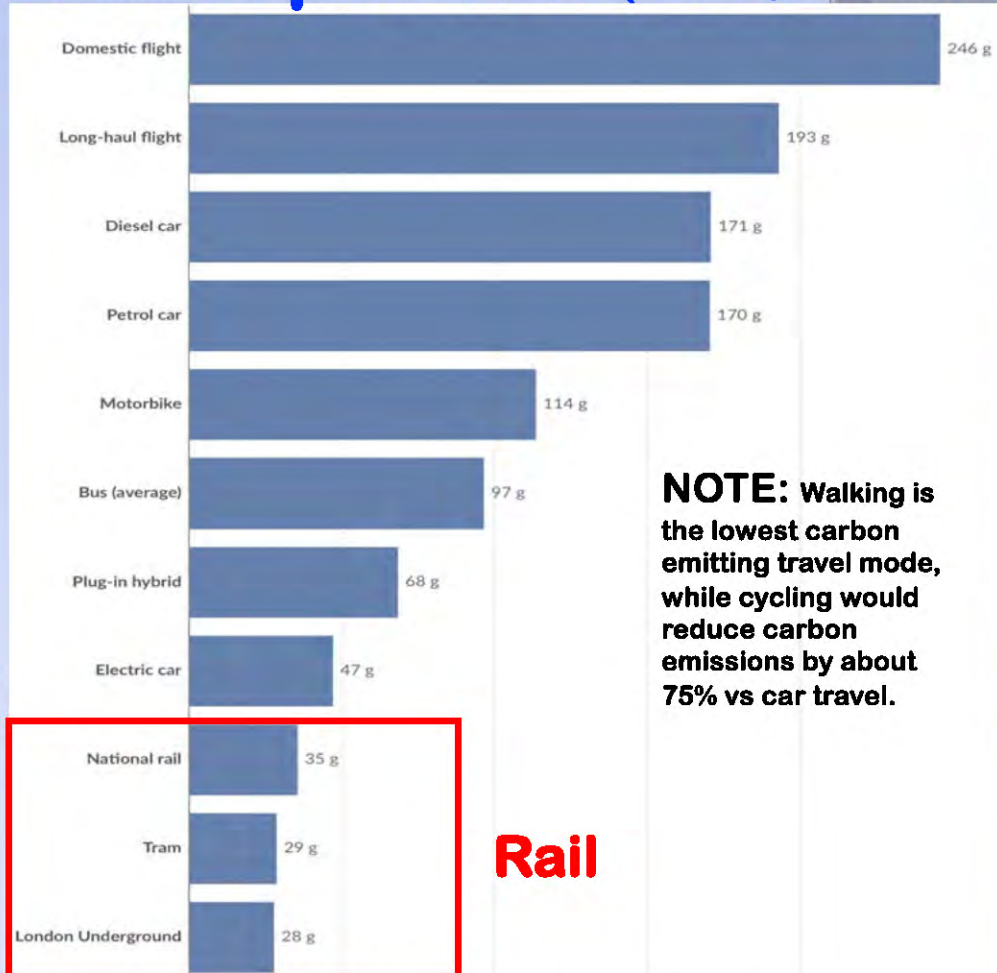
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NOTE: Walking is the lowest carbon emitting travel mode, while cycling would reduce carbon emissions by about 75% vs car travel.

Rail

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Submission to
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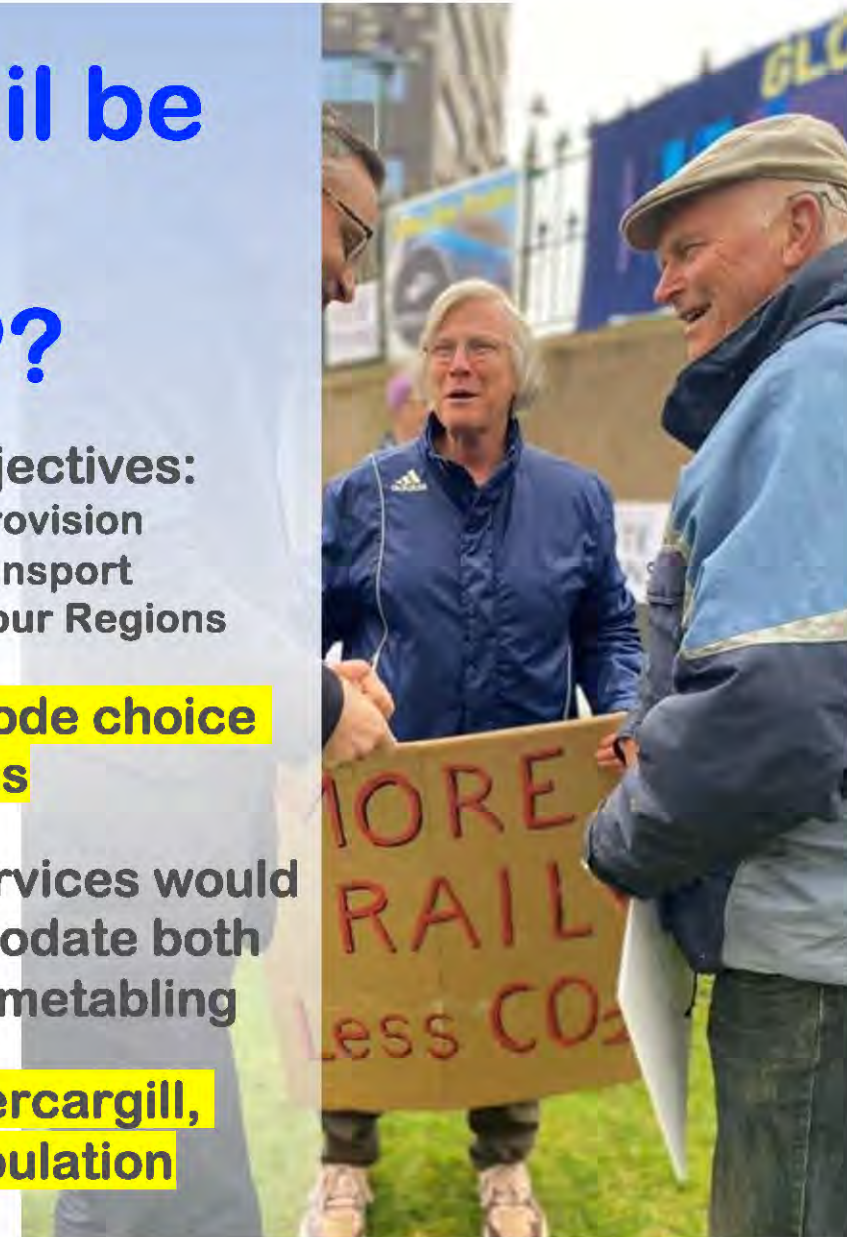
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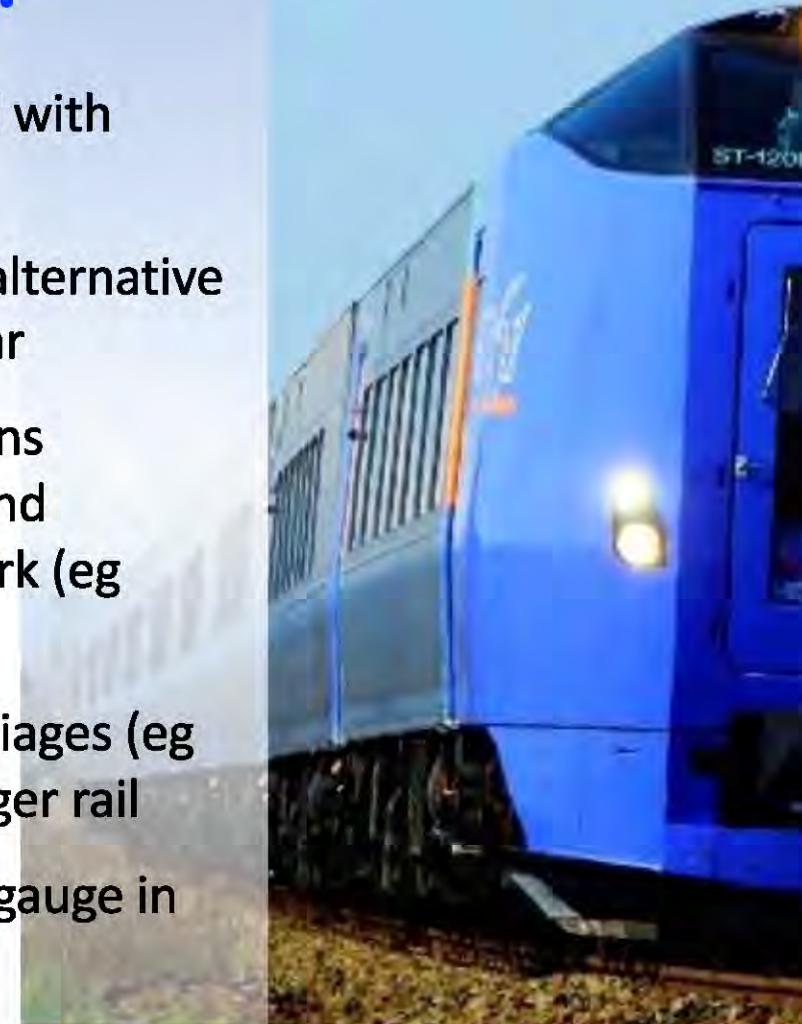
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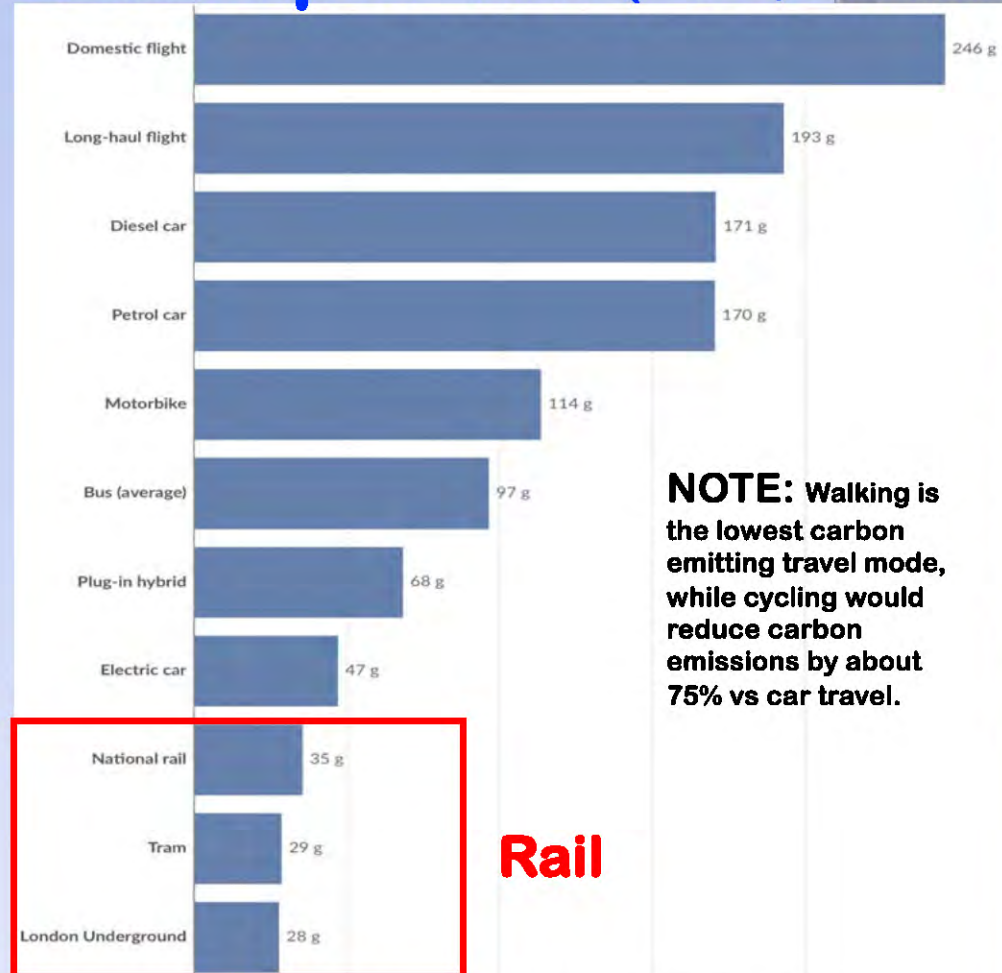
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Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

Do you support our preferred option
or do you have another view?

Investing in flood protection infrastructure

Due to the challenges of Southland's ageing flood protection network and a changing climate resulting in more severe and enduring weather events we are proposing increased and ongoing investment in the region's flood protection infrastructure and river management to increase community resilience.

Preferred option: Increase operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Infrastructure Rate (see Revenue and Financing Policy Statement of Proposal on Rates – www.es.govt.nz).

This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☐

Another option/view

Do you have any further feedback?

- ①. Rates - Everyone needs more time to process and decide whether Capital Value is best and fairest for Southland or maybe land area would be a better option. There definitely needs to be a change I think a years delay in making this decision will benefit everyone. Open and honest discussion.
- ② \$2.3m per annum. I'm not sure the timings right with Inflation we don't need to feed the fire anymore. More homework needs to be done can't just keep topping up funds (Rates) with out looking at the bottom line (you will never have enough under your system).

Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

continued from 1st page.

③ Rates collected must stay in there area's
All documents I have read about are one pool
Te Anau rivers and area's not mentioned once.

Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.



Yes



No

Please note: Upon request, we are legally required to make all written or electronic submissions available to the public, including the name and address of submitters, subject to the provisions of the Local Government Official Information and Meetings Act 1987. If you consider there are compelling reasons why your contact details and/or submission should be kept confidential, please contact the Council at the address below to make your request known.

Contact details

Name: Barry Taylor

Organisation (if representing): Te Anau CLC

Organisation role: Chair

Postal address: 960 Te Anau Northern Highway

Postcode: 9672

Email: jen.bba@extra.co.nz

Phone: 03 249 7053

Signature: [Signature]

We can receive your feedback in a number of ways:



Mail
Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840



Delivery
Environment Southland
Cnr North Rd & Price St
Invercargill



Online
www.es.govt.nz



Email
consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally



6 May 2024.

SUBMISSION TO ENVIRONMENT SOUTHLAND – LONG TERM PLAN.

The Mataura Catchment Liaison Committee-CLC provides a vital connection between Environment Southland (ES) and the Mataura Catchment Community. Its purpose has been to approve annual budgets, operations programs, advise on capital works activities and otherwise discuss rating and all matters affecting river works and drainage.

The current ES Long Term Plan (LTP) process raises significant concerns that the Mataura CLC wants to address to Council and inform ratepayers. Our theme today is CONSERVATION and how understanding CONSERVATION will replace the need for the Flood and Infrastructure Rate.

Introduction: Insufficient time was allowed for reasonable public consultation and ES seems happy to sacrifice their reputation and take accusations of incompetence and intentional delay “on the chin”, but that in turn reflects on staff who deserve better leadership. It looks like a calculated ploy to deflect submitters from the LTP contents and its impact on ratepayers?

Issues in the LTP are:

- **Revenue, Finance and Policy changes.** You can now see what happens when you insert the Funding and Rating review in the middle of the LTP. The first should occur a year ahead instead we have a dogs breakfast. Perhaps that was intended.
- **Rating changes:** We agreed only to the change to Capital Value rating across all expense items.
- **We are blind sided by regionalising stop-bank structure maintenance expense,** flood-warning, depreciation and admin expenses and removing them from the CLC budgets.
- **We separately oppose the raising of an extraordinary Flood Maintenance and Infrastructure Rate.**
- **LTP budget changes include extraordinary increases during the life of the LTP;** Inflationary effect on rates (4.5%) is largely unavoidable. But the enormous hike in (a) flood planning and infrastructure expenses (14%), (b) monies commandeered from leasehold reserves (4%), (c) the consequential (\$73 mill) debt, and (d) significant staff increases, have not been well communicated or come with the obligatory detail in the LTP for ratepayers to fully understand.
- Not mentioned in the LTP but it is our prediction, a half of you Councillors will be dead by 2035-the end of the LTP period, so those in that group have limited time to look in the mirror and ponder this legacy you encumber on Southland's ratepayers and ask yourselves “did you get it right”? No, you haven't - so no you didn't!

1. The Mataura CLC supports the shift to Capital Value rating. It is a positive move to spread the rating burden.

(a)The existing old classification rating system has been an impediment to expanding budgets into water quality and conservation, because budgets were confined to River Works and Drainage in A-E class areas. Larger budgets under the classification system would impact the A-E class ratepayers disproportionately. CV rating will allow more funding, especially to the voluntary Community Catchment Groups - CCG's, involved in a wide range of activities: riparian planting, erosion prevention, wetlands, improved water quality, to name a few.

(b) The Mātaura CLC's initiative of grants to CCG's is an example of energising local conservation projects, to tap into the CCG's expertise and experience, and potentially will be the game-changer to achieve "slow the flow" objectives for a fraction of the cost of this Flood Infrastructure Rate.

(c) ES moved quickly to impose nutrient limits and farm-management plans on dairy farmers, 15 years ago, but have been asleep at the wheel when it came to hill and high country development. ES had an opportunity to adopt policies and ensure; riparian strips adjacent to waterways were left undisturbed, wetlands retained, vulnerable land retired, promote water storage and actively facilitate pest and weed control and extermination, all with the objective to "slow the flow" an idea that has done the full circle and gaining traction again. It is simple, logical and least cost.

This is CONSERVATION 101 and it should be half ES's work.

2. Regional rates vs Catchment Rates. The removal of structure maintenance and other items, out of CLC's budgets signals to us the intentional erosion of CLC's responsibilities and input. It is Local Government after all or does ES want to be more detached from ratepayers? At the time of writing this submission, requests how rates might look if left alone have been unanswered, making it frustrating to comment other than it looks fishy!

It is becoming clear however, the whole change in rating and funding is a money-grab to relieve Waihopai (Invercargill) from it's rating responsibilities and remove it from its duty to fund its own contingencies. It is a misappropriation of all CLC reserves, and ratepayers will be swamped in debt for the benefit of Waihopai/Invercargill? Mātaura is self sufficient. Oreti and Waiau too. What other conclusion is there? A classic case of bullying and it is not fair or right. Why then is there not even a hint of a price on the Waihopai detention dam?

3. Flood Maintenance and Infrastructure Rate. The current catchphrase is "nature based climate adaption solutions" yet the quantifiable work in the LTP emphasises stop bank work of \$2.3mill at Lumsden and \$3.5mill at Winton and an uncoded detention dam project on the Waihopai. Maybe \$10 mill of work, but \$50- 60 mill higher debt. Is this a joke? More detail is necessary? **No one should be rated to write blank cheques to ES. We oppose the new rate.**

4. LTP budget changes include: increases of 43% in revenue, increase of 286% in debt, and budgets based on the presumption the Gov't will tip in \$125 million in Government grants that aren't yet committed.

At the same time Managed Funds will rise from \$30 mill. to \$48 mill. Are we financing some Ponzi scheme? Good on you for having investments but don't run up huge managed funds, and increase debt at the same time paid for by ratepayers. Investment income should supplement rates. Stop listening to consultants and interests that contribute nothing in rates. Pay attention to us.

5. The LTP has no comment on the affordability of rates and huge increases in debt when ratepayers are under significant stress from costs of living, commodity prices, higher insurance and interest payments. ES misreads their mandate putting cultural as a primary pillar of the LTP, ahead of Southland's economy, the environment and the social impact of rates increases. Ratepayers struggling to pay existing rates have absolutely no capacity for rates increases.

You have lost your way. Ratepayers are subordinate to those interests that enjoy rates remissions or pay no rates yet have privileged rights akin to that of the power of veto. How insulting can you be not to consult CLC and r/payers on F/plain mgmt.P30. When ratepayers revolt we will be with them.

3.

6. The Financial Reserves Policy lacks clarity on the ownership of Reserves; Special Reserves, Rating District Reserves, Leasehold land Reserves, the unequal disbursement of LINZ funds, and we mention too the Matura Flood Reserve and the Gravel Monitoring Fund. The commandeering of leasehold and other reserves without explanation to CLC's is not accepted and not good faith practice.

The old objectives are clear how Leasehold Land Reserves were managed and we have it here:

1. To fund natural disaster damage for the leasehold areas.
2. To fund approved capital works and major maintenance programs within the catchment the leasehold land is situated.

ES fail to acknowledge that reserves administration up until now rests with the CLC,s and ES together, not ES alone.

The Financial Reserves **policy owner** must remain with the CFO and the CLC's, together and be confirmed as such.

Matura Catchment is self-sufficient if reserves we know are ours are left where they belong. They can be used for the residual stop-bank contingencies on the Matura river in Gore and elsewhere. Matura has no need for more debt.

5. Structure: ES have Freshwater Management Areas, that with minor adjustments will serve as a template for Catchment Community Boards.

Promotion of a COMMUNITY structure for the catchments has advantages:

- The Election of Local Board or Community Boards on 3 yearly cycle.
- Members bound by codes of conduct, modified Terms of Reference and generally managed like existing TLA Local Boards/Community Boards.
- To provide an improved structure for whole catchments (FMU's).
- To strengthen and formalise the relationship with existing and emerging catchment groups.

The Local Government Act recognises Local Boards and Communities*(My ref: Local Government Act 2002, Sec 48, Sub Part 1A and Sub Part 1B), which provides a ready made structure for establishment, functions, duties, powers and elections.

Please-confirm the status of CLC's as **Catchment Community Boards** as defined in the LG Act.

7. General:(a) Where is any analysis of staff numbers and the justification of increases? The Plan states that some increases will be to River Management and Drainage. We suggest, the present River Managers and Catchment Supervisors have skills and experience but be allowed to do their jobs, and the liaising with DOC, IWI and Fish and Game should be the responsibility of the Catchment Operations Manager and staff further up the salary scale. This an organisation issue.

(b) On the one hand the narrative is the topical-nature based solutions-but the reality is the LTP seems only about investment in **Flood Infrastructure**. What's it going to be? **CONSERVATION** by nature based solutions or a new crippling rate and higher debt? What's it going to be-indeed?

(c) Our recent inspection at Glenaray confirmed Fish and Game people are impossible to deal with and do not understand how early intervention in river management will reduce sediment and phosphorus loss and prevent major capital costs later.

CLC's focus is on reducing sediment and phosphorus in the rivers and Fish and Game seems intent on making it worse. We are here to help, they are there to hinder.

(d) The Murihiku slow the flow project is a total waste of time and resources. How ES can justify 3 years of collaboration, learnings, feasibility studies, modelling, assessments and peer reviews to initiate basic CONSERVATION makes no sense. It smells of job protection. We are told its "high-level" like a lay-person wouldn't understand. How rich is that?

4.

Summary: Councillors - stop asking for science like it is the answer. The practical science, if you like, is CONSERVATION. It is the application of old proven principles (see attached). The information on where and how, ES has it now. More data-gathering? New innovative solutions? More meetings? More feasibility studies? More peer reviews? More reports to approve. Really!! Just do something practical instead or step back and let the Community Catchment Groups show ES how it is done. Step back and facilitate not frustrate; seek benefits over bureaucracy, encouragement before costly consents.

Decisions around river management, drainage, gravel relocation, and early intervention solutions, and slow the flow is the job of the catchment managers, works supervisors and CLC's who understand the rivers best, and won't cost \$50 mill. Ratepayers and landowners need incentivised not crippled with rates and debt.

The Catchment Operations Leader has been shown the promising work around slowing the flow in West Otago and we understand ES Staff and Board have yet to inspect the Pomahaka Watercare Project. This is CONSERVATION in practice. The half ES neglects. Good CONSERVATION is community lead. Ref below.

You Councillors can't be making decisions on this LTP without being informed on work, science based work I might add, is happening virtually on your doorstep, in West Otago.

The Mataura CLC asks ES to hit pause and delay all aspects of the Flood and Infrastructure Rate for (at least) a year, and do what previous councils have done, spend a year and take your presentation to the towns and communities impacted by the 23% rates increase. The drop-in sessions promoting the LTP were barely advertised and equally poorly attended.

More importantly, do a re-think of what ES is trying to achieve. If you slow the flood waters in the mid to upper catchments you avoid costly infrastructure capital upgrades downstream. It's that logical.

If slow the flow is the solution then the Flood and Infrastructure Rate must be put on hold. Begin to focus on all reaches of the river, and how water flows vary in a flood.

Conclusion:

Stop right now investing in infrastructure that only addresses the consequences of flooding and understand the causes.

You have it back to front.

The LTP is the accumulation of policies and strategies you all progressively approved without adequate scrutiny of the costs, or an appreciation of the impact.

This rates increase and debt proposal is outrageous, and sadly will be endorsed if you Councillors don't stop it.

You say, you didn't see this coming - well neither did we or would we vote for it!

HUGH GARDYNE - CHAIRMAN MATAURA CATCHMENT LIAISON COMMITTEE.

CONSERVATION: Conservation is a broad and diverse management discipline:
General:

- to promote soil conservation and prevent damage by flood and erosion.
- to widen, deepen, straighten or divert rivers, streams and water courses for controlling and preventing flood damage and erosion.
- to maintain and improve water quality; including fresh water, ground water and artesian water.
- to build and maintain stop-banks to protect people, assets and infrastructure.
- to ensure adequate account is taken for the needs of primary and secondary industries, water supplies of local authorities, fisheries, wildlife habitats and all recreational uses of natural water.

Community and Private Property:

- to plant trees, shrubs plants or grasses for conserving soil and preventing erosion.
- to retire land for the purpose of conserving soil and preventing erosion.
- to construct defences against water to prevent erosion; including relocation and extraction of gravel, and water storage to mitigate damage from floods.
- to encourage riparian planting on public and private land.
- to create wetlands and similar impediments to reduce flood risk and erosion.
- to prohibit or control the erection of fences or buildings that might obstruct the free flow of flood waters including on established stop banks.
- to regulate any change in land use on stop-banks; stock classes, carrying capacity, and agricultural or pastoral use.
- to refrain, for specific periods on stop-banks, from stocking, cultivating and depasturing on land any particular kind or class of stock.
- to control or exterminate rabbits, pigs, deer and goats.

- to control any noxious weeds; gorse, broom, blackberry or other plants.

Hugh Gardyne - Chairman Mataura Catchment Liaison Committee.

MATAURA CATCHMENT LIAISON COMMITTEE – SUBMISSION TO THE LTP.

NOTES:

- 1. Too much to absorb in the LTP and too little time to respond.**
- 2. Commandeering leasehold reserves and surpluses amounts to taking monies that aren't ES's, so leave them alone.**
- 3. Interfering and removing expense items; Infrastructure maintenance, admin, flood-warning etc.. from our budgets without adequate discussion or consent.**
- 4. No one, and I have tried, has received clear understandable information on what rates would be to individuals if the huge hike caused by the Flood infrastructure rate was excluded.**
- 5. Please confirm the status of CLC as Catchment Community Boards. People within ES thinks they are already, so just finish the job. We don't want paid. It's community service.**

7. Inflationary affect on rates is 4.5%, near the RBNZ range of 2-3% inflation. Everything else in ES rates increases is unaffordable.

8. What is it you want? - Slow the flow from modest manageable rates increases or \$75 million dollars of infrastructure and questionable new salaries that do nothing directly to slow any flow and solve long term challenges.

The various workshop meetings always asked the wrong question.

What is most important issue for Southland - It's the economy and conservation.

Subject: FW: ES LTP public consultation and meetings

From: Geoff Scott <dronescott1650@gmail.com>
Sent: Friday, April 26, 2024 12:31:10 PM (UTC+12:00) Auckland, Wellington
To: Nicol Horrell <Nicol.Horrell@es.govt.nz>
Subject: ES LTP public consultation and meetings

Good morning Nicol. further to our conversation this morning regarding the public consultation and breaches of the the Principles of consultation Act 2002. The differing information on websites and wording in documents. quite clearly stating two different things. The conflicting and misleading data on UAGC rates both written and verbally presented.

2002 act Principles of consultation.

In brief and confirmed by Internal Affairs. That anything that will impact on all individual stakeholders/ rate payers must be presented and/or supplied with the appropriate information. This needs to be sent to each individual stakeholder in a timely manner that allows them to process research and question all data before making a clear and fully informed consent to consult on the proposed changes . there needs to available time and process for each individual stakeholder/rate payer to contact the appropriate authority ie ES to question and receive an adequate fully informed response and too if needed for further information to be able to request further information to again have the adequate information on hand, to fully consult on the proposed documents being asked for by ES to submit on. This can be very stressful and time consuming with the very busy and stressful environment that we stakeholder/rate payers find ourselves in today. The previous and the newly elected government have made it very clear on many occasions they are very concerned about anything that impacts on our mental health and wellbeing. Your inability whether deliberate or unintentional to schedule these drop in or public meetings at inconvenient times and poorly advertised locations, not to mention when arriving at a meeting or drop in there is very limited material for us to take away and study for we the stakeholder/rate payers to consult on. I congratulate Western Southland Groundswell for organising a recent meeting at Otautau to which ES staff attended you included. When I questioned you after the meeting you said no Invercargill meeting was planned. You also said town hall meetings were a waste of time and no one attended them. I'm very sure we both had just left aTown Hall meeting that was very well attended and with many people attending from well outside their areas, I left that meeting with more questions than answers. I had lots of time to process your response and the very glossed over information I just received from the meeting. I then studied the 2002 Act for several hours when I got to my home just out of Invercargill. In the process I discovered some many breaches of the Act whether un intentional or deliberate I was left flabbergasted at the way our stakeholder/rate payer democratic rights have been removed or just ignored. I have contacted Internal Affairs several times to seek clarity on issues and have been advised that yes I am correct that breaches of the Act have been made by ES. At Waimahaka I asked [REDACTED] for a later deadline For people to obtain all the information and have fully informed Public Meetings, [REDACTED] advised me to write a letter. A brief criticism of the Invercargill Meeting. On Tuesday I rang [REDACTED] from your office at 11.35am and we had a conversation that lasted 7m 43s. during which I commented on the breaches of the act and also the action that I might need to take because of the breaches and total lack of full public consultation as outlined in the act. Which Internal Affairs verified is still the current legislation. [REDACTED] texted me back at 1.55pm. too which several text messages followed. I tried calling and left several times and left voice messages for [REDACTED] to contact me back. Still waiting because apparently [REDACTED] has now gone on leave. The phone calls were still within the working day and the last one was at 2.49pm. still adequate time for a personal reply. It's now Friday 12.22pm and still no reply. I'm sure someone must monitor or take

over [REDACTED] phone while she is not able to conduct her duties as a paid employee of ES. Nicol I could continue on but I have now spent the entire morning researching and sending this and other matters relating to the ES LTP but I have other commitments including going to check on her , as I am her principal carer. I am only asking that you delay the consultation process for 4-6 weeks from the proposed May submission date. I look forward to a timely reply. Geoff Scott

Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

Nightcaps
** Enhance wairo stream edge in McGregor park (bush walkway) with native plantings*
** More pest control (possums & ferrets) by ES staff*
Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.

☒ Yes ☐ No

Please note: Upon request, we are legally required to make all written or electronic submissions available to the public, including the name and address of submitters, subject to the provisions of the Local Government Official Information and Meetings Act 1987. If you consider there are compelling reasons why your contact details and/or submission should be kept confidential, please contact the Council at the address below to make your request known.

Contact details

Name: Wendy Joy Baker

Organisation (if representing): _____

Organisation role: _____

Postal address: 3 Lyne St Nightcaps Postcode: 9630

Email: wendyjoybaker@athleteworlds@gmail.com Phone: 0204 0890283

Signature: Wendy Joy Baker

Let us know what you think of our Long-term Plan proposals

Have your say by 5pm, 6 May 2024.

Details are available at www.es.govt.nz or give us a call on 0800 76 88 45 and we will send you a copy.

We can receive your feedback in a number of ways:

 **Mail**
Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840

 **Delivery**
Environment Southland
Cnr North Rd & Price St
Invercargill

 **Online**
www.es.govt.nz
Written, video, audio or image

 **Email**
consultation@es.govt.nz

Please call or email us if you want to make a verbal submission.

Scan the QR code to visit our website and give your feedback.

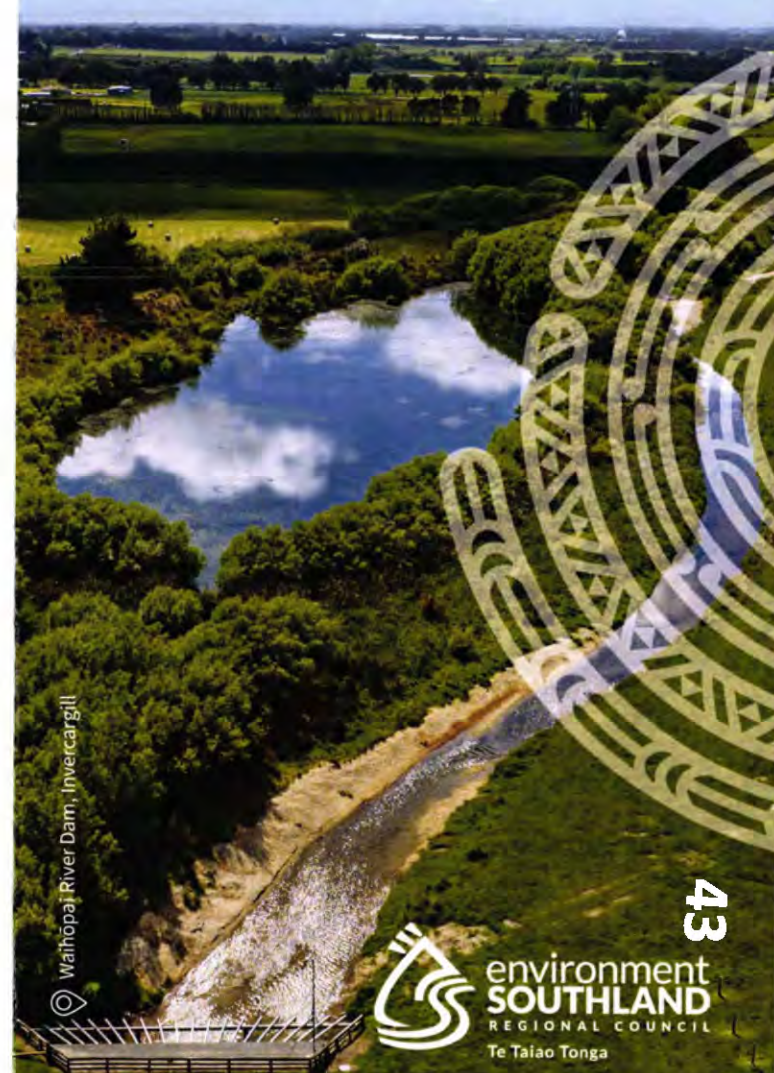


Page 60

Investing in Southland

Whakangao ki Murihiku

2024-2034 Long-term Plan Consultation
March-May 2024



Waihōpai River Dam, Invercargill

 **environment SOUTHLAND**
REGIONAL COUNCIL
Te Taiao Tonga

We want to hear from you

Tell us what you think about...

- Investing in flood protection infrastructure
- Changing the way we rate – Revenue and Finance Policy

Our draft Long-term Plan consultation document, *Investing in Southland Whakangao Ki Murihiku*, is open for submissions now.

- The Council's key proposal is for ongoing and greater investment in flood protection for Southland to improve community resilience.
- We're also reviewing the way we rate – we want to make it simpler and more equitable.
- You can also have your say on a range of other topics:
 1. Fees and charges schedule
 2. The regional climate change strategy
 3. Targeted rabbit control rate
 4. Council's shareholding in South Port NZ Ltd
 5. Infrastructure strategy
 6. Significance and Engagement Policy
 7. Representation review
 8. Financial Strategy

Investing in Southland Whakangao ki Murihiku

2024-2034 Long-term Plan
Consultation March-May 2024



Investing in flood protection infrastructure

Southland has four main river systems – Mataura, Ōreti, Aparima, Waiau – and flooding is our most likely natural hazard.

Environment Southland is responsible for flood risk mitigation and our regional network of flood protection infrastructure.

The network comprises 500+ kilometres of stop banks across the region, drainage networks, spillways, dams, tidal gates and pump stations. It is designed to engineering specifications to substantially reduce the impact of flooding on people, property and critical infrastructure such as roads, utilities, telecommunications and the airport.



Changing the way we rate – Revenue and Finance Policy

It is becoming clear that to build Southland's resilience as a community we need to look at the value our services have across the region and acknowledge that for most services, everyone benefits, whether that's socially, environmentally, culturally and/or economically.

Therefore, the Council undertook a review of funding and our Revenue and Financing Policy and thoroughly debated how we could more equitably share the costs across the region. As a result, we are consulting on a proposed change to our rating system where everyone shares in the cost of the services that benefits all.

The proposed rate increases are averages and the actual increase will be dependent on factors related to your individual property.

Make a submission

To give your feedback, simply complete the form below and on the reverse of this page. Then tear it off and drop it into our office or hand it back to one of our staff members.

Do you support our preferred option or do you have another view?

Due to the challenges of Southland's ageing flood protection network and a changing climate resulting in more severe and enduring weather events we are proposing increased and ongoing investment in the region's flood protection infrastructure and river management to increase community resilience.

Preferred option: Increase operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Infrastructure Rate (see Revenue and Financing Policy Statement of Proposal on Rates – www.es.govt.nz).

This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☐

Another option/view

undecided

Do you have any further feedback?

*I question what value
I get for the rates
paid to ES @ present?
What specific things
have ES done in
Nightsaps over the
past 7 years?*



Nightcaps



Mcgregor Park entrance , along stream,
adj Leithen St .



Needs tidy & plantings suggested
along stream.



Beautiful Bush walk.
along stream.



Needs planting & tidy up.



Needs tidy & planting

Majestic McGregor Park. (Nightcaps)

- ~ Majestic McGregor Park..with its bush walk beside the Wairio stream is so serene
.. Bellbirds sing & fantails play amongst the Oak & beech trees..(where dogs need to be on leads please)
(throughout the Park)
- ~ Yes..Majestic McGregor Park..a place to enjoy for all
Theres the playground for Kids... and campervans
.. & tourists can freedom (self contained) stay (limited)
.. & Anyone can have a picnic underneath one of the trees... so tall
- ~ Majestic McGregor Park..in Nightcaps..
is a nice place to walk..or run..or bike
.. Whether in the rain or in the sun ...
Its a special sanctuary to be respected
.. where nature should be honoured & protected
enhanced .. Thats right
- ~ Majestic McGregor Park is there to be appreciated... by everyone ... for everyone
Its a peaceful place... to connect... to reflect and to admire... natures beauty... don't forget
- ~ Yes..Majestic McGregor Park is a special place where I have trained for NZ Masters Games
... & Thus I tribute one of my four Gold medals won in 2024... to this pretty iconic N.Park... fame
- ♥ Poem written by Wendy Jay Baker - (Champion March 2024 (Athlete (40 years)



Wendy
Jay
Baker.

4
Gold
Medals
&
Certificate.

2024



Tell us what you think

79
**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

Do you support our preferred option
or do you have another view?

Investing in flood protection infrastructure

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This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☐

Another option/view

Do you have any further feedback?

I wish to make a submission regarding the flooding at Makarewa Bridge on Highway six

We have been stranded twice in Invercargill due to flooding.

I suggest That the North and south approaches be raised to prevent flooding on road

Emergency services and all traffic to the north and and West is blocked by this flooding. Wallace town Highway

Is also blocked

I believe this would be a simple solution to an ongoing problem.

Trust this submission is looked at favourably by environment Southland

E. Dunning



Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

Continue the Otto seal program. It is very successful

Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.

☐

Yes

☐

No

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Contact details

Name : Ewen Dunnage

Organisation (if representing): _____

Organisation role: _____

Postal address: 737 Dipton Mossburn road

Postcode: 9791

Email: goldenponds@xtra.co.nz

Phone: 027 268 1241

Signature: _____

We can receive your feedback in a number of ways:



Mail

Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840



Delivery

Environment Southland
Cnr North Rd & Price St
Invercargill



Online

www.es.govt.nz



Email

consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally



Tell us what you think

79B
**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

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or do you have another view?

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This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☐

Another option/view

Do you have any further feedback?

Submission regarding flooding Makarewa river bridge Highway 6

I would like to see this bridge flood free for all traffic.

Twice we have been stranded in Invercargill due to Highway 6 being flooded.

By raising both North and South approaches, flooding would be highly unlikely.

Emergency services and all traffic to the North and West is stranded as Wallacetown highway flooded also.

I believe this is a simple solution to an ongoing problem.

I trust Environment Southland agree to this submission.

Signed

Ewen Dunnage.



Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.

☐

Yes

☐

No

Please note: Upon request, we are legally required to make all written or electronic submissions available to the public, including the name and address of submitters, subject to the provisions of the Local Government Official Information and Meetings Act 1987. If you consider there are compelling reasons why your contact details and/or submission should be kept confidential, please contact the Council at the address below to make your request known.

Contact details

Name: _____

Organisation (if representing): _____

Organisation role: _____

Postal address: _____

Postcode: _____

Email: _____

Phone: _____

Signature: _____

We can receive your feedback in a number of ways:



Mail

Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840



Delivery

Environment Southland
Cnr North Rd & Price St
Invercargill



Online

www.es.govt.nz



Email

consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally



Subject: FW: 20240419 Environment Southland have your say - martin gledhill

From: martin gledhill <emgledhill@bigpond.com>

Sent: Monday, April 22, 2024 8:33 AM

To: Consultation <Consultation@es.govt.nz>

Cc: emgledhill@bigpond.com

Subject: 20240419 Environment Southland have your say - martin gledhill

Resend : River bank trees added R

Hello ES and following no implication about your work – I have some understanding.

Understanding the ever increasing pressure for media statements over actual outcomes it has been very confronting to see the change after 35 yrs is Aust/PNG, of course much much more change from 900 yrs ago.

Flood Protection – fundamental is if you choose to build in a river bed or flood zone then you deal with flood impacts. Impact obviously increased by removal of forest as allows rapid higher peak levels. Difficult subject given development, approvals, growth. Separation of coastal and inland flooding needs to be clear

Rates – my land Mossburn was chosen as safe quiet so not entirely keen to raise rates for works to protect people who made 'interesting' choices. Kind of support increases if real outcomes demonstrated

Other Topics – the big issues appear to be:

- Stoats Cats then possums pigs deer
- Extensive destruction of beautiful native beech forest (see on Google maps then Copernicus satellite etc)
- Pine tree invasion
- Farming intensity (ES dealing with for a while – difficult)
- **Long** term replace willow/poplar trees along every... river, creek & wetland by planting beech

Coastal erosion / sea level rise is part of NZ for ever ie Kaikoura rise 2m a few yrs ago, beaches and estuaries always moves.

Any environ groups to assist around Te Anau?

R

Martin Gledhill

0272161632

Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

Do you support our preferred option
or do you have another view?

Investing in flood protection infrastructure

Due to the challenges of Southland's ageing flood protection network and a changing climate resulting in more severe and enduring weather events we are proposing increased and ongoing investment in the region's flood protection infrastructure and river management to increase community resilience.

Preferred option: Increase operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Infrastructure Rate (see Revenue and Financing Policy Statement of Proposal on Rates – www.es.govt.nz).

This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☐

Another option/view

Wairau
catchment
meeting

(Ella L handed OC)



Do you have any further feedback?

I wish to submit my
submission in person.
At the Hearing.

Other feedback

Do you have feedback on the other matters raised or anything else?

- ☒ Revenue and Financing Policy
- ☒ Shareholding in South Port NZ Ltd
 - Financial Strategy
 - Climate change strategy
 - Targeted rabbit control rate
- ☒ Fees and charges
 - Infrastructure Strategy
- ☒ Significance and Engagement Policy
- ☒ Representation Review

Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.



Yes



No

Please note: Upon request, we are legally required to make all written or electronic submissions available to the public, including the name and address of submitters, subject to the provisions of the Local Government Official Information and Meetings Act 1987. If you consider there are compelling reasons why your contact details and/or submission should be kept confidential, please contact the Council at the address below to make your request known.

Contact details

Name:

Alanna Barrett

Organisation (if representing):

Under 20k income Ratepayers

Organisation role:

Hilltop community CEO

Postal address:

23 Johnston Rd

Postcode:

9630

Email:

Nightcaps

Phone:

03 280 3113

Signature:

alanna@slingshot.co.nz

alannabaret

We can receive your feedback in a number of ways:



Mail

Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840



Delivery

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Invercargill



Online

www.es.govt.nz



Email

consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally



Subject: FW: Submission. Draft LTP 2024-2034

From: Doug Fraser. <djfraser@xtra.co.nz>
Sent: Tuesday, 14 May 2024 9:07 am
To: Consultation <Consultation@es.govt.nz>
Subject: Submission. Draft LTP 2024-2034

Submission. Draft LTP 2024-2034

Doug & Jan Fraser
 Gropers Bush, RD3
 Riverton
 Ph 027 473 2180
djfraser@xtra.co.nz

We own both a dairy farm and a sheep/beef/dairy support farm in Western Southland.

We are concerned by the compounding rate increases being charged on our family business.
 See appendix for a case study analysis of rates ES charged on our modest sized dairy farm since 1999.

LTP Proposed increases on our properties.
 Gropers Bush Dairy Farm. Increase of \$475-67. Plus 13%
 Roundhill Sheep/Beef/dairy Support. Increase of \$1,333-98. Plus 38%

We are concerned by the inequities created by a valuation based rating system.

The move to reduce transparency and subsequent accountability will exacerbate the current disconnect between the relative costs imposed on our family business and that of other non farming families.

EXPENDITURE and RATES

Case study. - see appendix
 Total rates have increased 250% (10.4% per annum) from 1999 to 2023.
 If next year's proposed increase is added this becomes an increase of 294% (11.78% per annum)
 The compounding effect of huge rate increases (33% increase in general rate in 2021) becomes very evident.

Change in rates by activity 1999 to 2023
 Total % increase. Average annual increase
 General Rate. 370%. 15%
 Biosecurity. 390%. 16%
 Land Sustainability. 2533%. 105%
 Catchment. 56%. 2.3%

The plan to shift back to core business (investing in flood protection infrastructure) is understandable given the shift in focus in the past 20 years.

The huge increase in General Rate in the 2021 LTP was reported to meet the cost of Central Government demands and the upgrade of your IT system.

Resizing the business is imperative following the change in Government, and their clear message to Local Government to back up the bus on the regulatory imposts of the Labour Government.

Environment Southland must play its part in the reduction of cost to the productive sectors.

The focus since 2020 (\$18.7million) and for the next three years (\$14 million) is primarily focused to protect urban property and infrastructure.

Rural properties that make up only 11% of your rate paying properties will pay 45% of the Flood Infrastructure Rate under your current proposal.

The proposed Flood Infrastructure Rate for our Roundhill sheep/beef/dairy support farm is \$1676, despite there being no catchment works.

On our Gropers Bush dairy property has a FIR of \$1437 despite our river flats being a ponding area.

How can it be equitable when there is both urban and rural properties receiving direct benefit from infrastructure providing flood protection but you are proposing to rate them on the same capital value rate as us?

Approximately half of the \$18.7 million that has already been “invested” is to meet the costs Stead St pump upgrade.

Based on our families share of the total capital value our liability for that expenditure is \$2,662.

How can it be considered equitable when the liability for a residence valued at \$450,000 is only \$92 ?

If the principal beneficiary is identified as the Invercargill Airport, then surely the owners (ICC) and/or the passengers should be targeted to fund the pump upgrade.

Invercargill Airport Ltd (ICC) made an after tax profit of \$1.119 million in the 2023 financial year.

Passenger numbers for the year were 375,000.

If the total \$9 million was levied as a targeted rate per passenger over one year it would be \$24 per passenger, or perhaps \$5 per passenger over five years.

If the \$9 million was borrowed at 5% the annual cost to service the loan is \$1.20 per passenger.

This is more affordable and infinitely more equitable than funding it through an inequitable capital value rate which targets farmers.

The lack of accountability for the huge budget blowout for the Stead St. pump upgrade makes me very nervous of the large capital expenditure budgeted for years four to ten of the LTP.

The lack of transparency and accountability for this expenditure blowout is extremely disappointing and concerning.

How can we be confident the rural sector will not be asked to fund 45% of future cost blow outs?

A rating system that clearly identifies and targets the beneficiary is essential.

Residential ratepayers while making up 83% of the rate payer numbers only pay 47% of the total rates.

Effective use of the UAGC to its maximum of 30% of total rates (\$229) will help restore some equity in the distribution of your funding requirements.

Clearly identifying the remaining 70% on a catchment by catchment basis, together with the sector beneficiaries within individual catchments on a differential basis, will ensure transparency and accountability.

Moving away from an itemised rate demand is great step backwards.

Only once there is a clear relationship between service provision and the funding of that service will there be sound decision making regarding the type and quantity of that service and true efficiency in the service delivery.

We support the principle of establishing intergenerational equity by prudent user of debt for capital expenditure.

The massive increase in user charges needs to be reviewed.

For example an increase from \$278 to \$600 plus Lab Fee (116%) in groundwater sampling fees clearly needs governance review.

The paper reports that fees are:

“set on a cost recovery basis”,

“keep up with inflationary costs and better reflect the service being provided”

.”have sufficient time to adjust our revenue and resources”

The arguments and the outcome defy logic.

Doug Fraser
Ph 0274732180

13th May 2024

NOTE I WISHED TO BE HEARD IN SUPPORT OF MY SUBMISSION.

Sent from my iPad

Subject: FW: Appendix to my submission

From: Doug Fraser. <djfraser@xtra.co.nz>
Sent: Monday, 13 May 2024 2:19 pm
To: Consultation <Consultation@es.govt.nz>
Subject: Appendix to my submission

Please attach this appendix to my submission
Thanks
Doug

Gropers Bush Dairy Farm

157.7ha

1999 ES Rates
LV. \$670,000
CV. \$1,085,000

General Rates. CV. 391-35
Bio security Plants. LV. 55-80
Bio security Rabbits. LV. 60-60
Bio security TB. LV. 211-50
Land sustainability. LV. 20-20
Aparima. E2. 373-35
F2. 156-85

TOTAL. \$1269-65

Deduct TB Rate. -211-50
Total for comparison. \$1078-15

2023 ES RATES
LV. \$4,440,000
CV. \$6,000,000

General Rate CV. 1702-62
UAGC. 143-44
Bio security LV. 571-38
Land Sustainability. LV. 532-05
E2. 611-34

F2. 218-27

Total. \$3779-11

Increase of 250% or a average of 10.4% per annum

If add proposed rate increase for 24/25 of \$475-67 then total rate is \$4254-78.

This is a total increase of \$3176-63 over 25 years. ie 294% increase or an average of 11.78% per annum.

Note the compounding effect of the proposed change.

Change in rates by Activity 1999 to 2023

Total % increase. Average annual increase

General. 370%. 15%

Bio security. 390%. 16%

Land Sust. 2533%. 105%

Catchment. 56%. 2.3%

Sent from my iPad

Submission :Environment Southland LTP 2024-2034

Andrew Morrison

beak.lisa@gmail.com

0276644620

General Comments

Thanks for the well presented “Investing in Southland 2024-2034 “LTP Consultation Documents. I felt it gave an accurate description of the challenges of decision making that the Council is charged with, and you have presented the options for the community to consider and give feedback on.

I believe the Document was presented well splitting the major issues into the two appropriate conversations.

1. The proposed Works Programme and Budgets giving clarity to the potential rates increase.
2. The Proposed changes to the Revenue and Financing Policy.

As a responding ratepayer we need to mentally separate these conversations for context. Thank you for the way you have presented this but in general conversations I get the sense people are struggling to grasp this and may respond without grasping the importance of the latter conversation. The document and the online Rates calculator are all premised on demonstrating the impact of the acceptance of both the rates increase and also the acceptance of the move to Capital Value rating. To give complete transparency to the implications of **not supporting** the proposed capital value rating implications , I feel it would have been beneficial to demonstrate that implication also

1/ Works Programme and Budgets proposed in the 10 year LTP

There is absolutely no question that the magnitude of the proposed rates increase is staggering and should be robustly questioned.

- Firstly, **I support the focus on community protection with the Flood infrastructure programme.**
- Secondly to this statement **I believe the magnitude of the rates increase is too great** for the community to support. If this is the case council may consider three options
 1. Reduce expenditure – much as you state you have zero rate increased all existing work programmes; I would encourage council to look for savings within existing expenditures.
 2. Increase non rate related revenues – this is being consulted on regarding South Port Ownership/Shares, and I fully support this. Are there other council assets (land) that can either increase revenues through revisiting lease returns or rationalising.

3. Staggering or Phasing the Flood infrastructural conversation and spend so as the community fully considers and appreciates the importance of this this proposal.
- I **do not support the reduction in the UAGC and encourage council to maximise the to its legislated 30%** - this is fully appropriate in the funding of council services that equally benefit all ratepayers.
 - Subsequently I also **support the use of Targeted Rates** where specifically appropriate. ie Pest Control
 - I **fully support Government co- funding for capital flood protection projects.**
 - I **fully support debt funding to reflect the intergeneration investment for capital protection projects.**
 - I support councils' investment in data capture to inform flood protection programmes and strongly encourage considerations of alternative flood mitigation investments ie slow the flow.
 - I support and commend the councils self-imposed debt Maximum disciplines.

2/ Revenue and Financing Policy

I support moving the Flood Protection Infrastructure and Biosecurity and Land Sustainability to a Capital Value rating model.

I believe this is a more equitable model and reflects some key principles.

1. Capital value rating better captures the intensity aspect of asset use within our communities and the subsequent risk associated with leaving them vulnerable to external events.
2. Capital value best reflects that in essence Flood Protection infrastructure protects capital assets (whether behind a flood bank or not – the importance of the protection of our crucial assets supports economic activity)

Also the argument pitched that only those that live near and/or benefit from flood protection should pay is an outdated premise. We collectively need to fund the protection of infrastructure we all benefit as a community from , ie the protection of our crucial assets , infrastructure and urban services

Southport NZ Ltd Shareholding

I support council maintaining a minimum 51% shareholding in Southport and investigating the sale of its additional shareholding.

Financial Resilience

I do not support the increase of financial reserves. This can almost be viewed as policy an either /or policy.

Either commit to fund the Flood protection Infrastructure /or build financial reserves to cover the cost of “events”.

Thanks for the ability to submit and I am pleased to present at submissions if it would deliver any additional value to your decision making.

Andrew Morrison

Submission from the Mid Dome Wilding Trees Charitable Trust

on

Environment Southland's Proposed Long Term Plan 2024-2034 Consultation Document

The Mid Dome Wilding Trees Charitable Trust wishes to make a submission on Environment Southland's Long-term Plan 2024-2034 Consultation Document.

We also wish to present our submission to Council at the Hearing as part of the Long Term Plan public consultation process.

Key messages to Environment Southland

The trust is seeking an increased level of support from Environment Southland through its Long Term Plan in a number of areas to enable our Mid Dome Wilding Trees Programme to be completed within the next 10 years.

These support measures include:

- 1) Increasing the direct financial contribution of the council from \$50,000 to at least \$80,000 per annum for wilding conifer control at Mid Dome.
- 2) Utilise the proposed capital-value based Biosecurity rate from landowners within our Programme Area for wilding control work.
- 3) Council lobbies government to increase its contribution to the National Wilding Conifer Control Programme from the current \$10M pa toward a target of \$25M pa.
- 4) Advocating Crown land managers with land management responsibilities within our Programme area i.e., DOC and LINZ, to properly fund their responsibilities with respect to wilding conifer control on their land now and in the future.
- 5) Supporting a national co-funding regime to seek contributions from those who benefit from or contribute to the needs of the National Wilding Conifer Control Programme.
- 6) Providing more comprehensive and robust regulatory tools through the Regional Pest Management Plan to protect the wilding control investments made to date at Mid Dome and elsewhere in Southland.
- 7) Support the transition of wilding tree management responsibility under the RPMP from the trust to the respective land holders within the Mid Dome Programme area once all coning trees have been removed.

The Wilding Tree Problem

Wilding trees are widely regarded by many as New Zealand's worst weed problem. They currently affect over 2M hectares and if left unchecked will infest 25% of our total land area. A cost benefit analysis undertaken by MPI in 2022 found that if the current National Funding is not increased to a sustainable level New Zealand would incur a net loss of \$3.8B over the next 50 years. This would result from direct negative impacts on farming and forestry, reductions in water yield from key catchments affecting water supplies for hydropower and irrigation, increasing losses from wildfires, and also significant adverse effects on biodiversity, social and cultural values. See https://www.wildingpines.nz/assets/Documents/CBA_Proactive-Release-v2-2022.pdf

While this is a national study the impacts it describes also apply to Southland as a region which is significantly affected by a wilding problem. Otago Regional Council has recently undertaken a similar study over its region which advises that “if funding remains at the status quo, it is estimated there will be losses of \$2.1 billion over 50 years (measured in 2021 dollars).”

These studies show that investing in effective wilding tree control today will result in an impressive cost benefit ratio of 34:1 nationally and up to 96:1 in Otago over 50 years. These ratios make an extremely compelling case to take the current wilding control programmes through to completion over the next decade.

The Mid Dome Programme

The Mid Dome Wilding Trees Charitable Trust, which is a community-led partnership, was formed in 2006. This eventuated from the significant support of Environment Southland, DOC, LINZ and other organisations and stakeholders who were being affected by the unwanted spread of wilding *Pinus contorta* from Mid Dome. The wilding tree invasion of this land was initiated by historic Crown and Catchment Board soil conservation plantings on Mid Dome between 1950s-1980s. By 2000 these had affected an area of around 70,000ha to the east and had the potential to spread on a further 100,000 ha of high country land and into Central and West Otago.

Since its formation the trust in partnership with agencies and stakeholders, has implemented a work programme which has contained the spread of wilding trees and has eliminated a significant seeding threat by removing lightly scattered coning trees from over 40,000ha of land east of the Maitai River. We have also initially treated the trees in the core infestation area of 20,000ha west of the Maitai River which produce the seeds that are further spread by wind at these altitudes. Our current focus is to eliminate all coning trees in this area to prevent further spread and to exhaust the existing seed bank in the ground to prevent any further regeneration.

The trust's review of the Mid Dome Wilding Tree Strategy in 2023 shows that approximately \$20M has been expended to date. It concludes that our work programme is now over halfway toward its completion goal by 2034. In order to achieve this a similar amount of funding will be required over the next 10 years. However, it also shows that if funding is insufficient then uncontrolled regeneration and spread from remaining seed sources will rapidly increase the costs and time needed to achieve this goal.

Proposed recent changes to ES support of the trust.

Council should be aware that ES staff have recently proposed some changes to the trust's structure and operation. These are primarily aimed at improving administrative efficiency. As a result of these discussions with the trust the proposed option is that ES holds all financial income including MPI funds, and also the Programme Management contract with the programme Manager Boffa Miskell Ltd. The trust will retain its own funds from other sources (ES, DOC and LINZ) and could apply for additional grants. A Governance Agreement/MOU would be put in place between ES and MDT.

This proposal also includes the reduction by ES of the administrative support (secretarial services, meeting and volunteer workday organisation, communications, etc.). These have been provided by an ES contractor as an in-kind contribution to the programme since about 2018 but this contract is not being renewed by ES. The trust raised our concerns about how this will impact on the trust's ability to govern the programme as it does not have the

resources to fund these additional services. ES staff have proposed to reallocate the current admin support and comms etc costs which we support.

ES has also proposed that they also provide increased staff time for wilding compliance and surveillance work. We support this proposed change but it should not have any financial impact on the core funding the trust receives from ES as wilding compliance and surveillance work on site are part of council's core biosecurity role.

We support the proposal in the draft LTP that council implements capital-value based Biosecurity and Biodiversity rates, and we understand that it is proposed that these rates will fund the council's biosecurity and biodiversity responsibilities. But we propose that the funds raised from this rate from landowners within our Programme Area should also be directly utilised our wilding control work. We note that unlike most other community-based wilding programmes, our trust has to date not sought a direct contribution from these parties to go towards our wilding control costs.

Why the trust is requesting these measures.

1. Increased Direct Funding

We propose that the trust annual funding from Environment Southland be increased to \$100,000 per annum. This is based on three factors.

1. The current direct funding contribution from council to the trust has remained static at \$50,000 per year since its formation in 2006. The trust believe that at a minimum the amount should at least be \$80,000 to compensate for 18 years of inflation.
2. Two key Crown Agency partners have recently reduced their annual contributions. DOC has dropped its from \$75,000 down to \$50,000 per annum and LINZ has recently informed us that it will no longer be able to provide any of its current funding of up to \$100,000 a year. This leaves a funding short fall of \$175,000 to be made up.
3. The council has a historic responsibility to accept its responsibilities as an exacerbator due to the Catchment Board instigating the original plantings at Mid Dome.

If this top-up cannot be provided by council it means that the Project Management costs which this funding was utilised for will now have to be funded we presume from MPI's operational grant. This will result in a significant reduction in the funding available to spend on the ground for wilding tree control operations. As stated above any funding below the optimum level will cause ongoing regeneration and spread from the remaining seed sources which will rapidly increase the costs and time needed to complete the programme resulting in us being unable to complete our Strategy's eradication goal by 2034.

2. Council Support for more National Programme funding

We strongly request that council actively lobbies the Government to increase its contribution to the National Wilding Conifer Control Programme from the current \$10M pa to what is a sustainable funding target of \$25M pa. The current baseline contribution from the Crown through MPI is insufficient to maintain all the significant gains made over the last 4 years, or to continue the momentum made to date by eliminating seed sources to reach the goals of the National Programme. Regional councils when working together have a powerful voice on issues of national importance both individually and collectively. These must be used to effectively promote the compelling cost

benefit case to central Government for the resources necessary to complete the National Programme.

3. Requiring a greater contribution from Crown land managers

DOC and LINZ need to be reminded of their requirement to properly fund their responsibilities as land managers with respect to wilding conifers now and in the future. Much of the most vulnerable land affected by wilding infestations at Mid Dome is owned by these Crown Agencies who are also major beneficiaries of our wilding control work. These agencies are also an exacerbator where Crown land infested by unmanaged wilding trees causes spread onto neighbouring private land. As described above the contributions for wilding control from DOC and LINZ are generally inadequate and declining. Regional Councils are again well placed to advocate effectively for need for these Crown land managers to meet their responsibilities.

4. Supporting a national co-funding regime

It is recognised that no single organisation or entity is able to fund the current shortfall in the funding needed to complete the National Wilding Control Programme. However, there is considerable potential to bring in additional funding by expanding the existing partnership. This would involve adding new partners who either benefit from or contribute to the need for wilding control. For example:

- a. Seeking contributions from water users, i.e., irrigators, hydro power generators, in catchments at risk from water loss due to wilding infestation.
- b. Lobbying forestry managers to carry out wilding control on neighbouring properties infested from their plantations.
- c. And if they are unwilling to implement the above control work, the forestry owners should instead be levied as the owners of seed sources that cause wilding spread off their land.
- d. Support an ongoing annual contribution to wilding control from the International Visitors Levy.
- e. A direct contribution from council's proposed capital-value based Biosecurity rate from landowners within the Mid Dome Trust Programme Area.

5. Improving regulatory tools

Council must provide more comprehensive and robust regulatory tools through the Regional Pest Management Plan to protect the wilding control investments made to date at Mid Dome. Despite the best efforts made in the recent reviews of RPMP's it has not yet been possible to devise and implement effective rules that protect those who control their wilding tree risks from those who do not. Unfortunately, these deficiencies are now shown in practice and Environment Southland needs to address this as a matter of urgency. Council needs to fully recognise this problem and provide the support and resources necessary to provide more effective and robust enforceable rules for wilding trees in its Regional Pest Management Plan.

6. Supporting the transition of wilding tree management responsibility

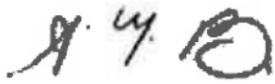
The Mid Dome Wilding Tree Programme will be completed when it has removed all coning trees from the programme area and responsibility for any ongoing maintenance is handed back to the respective land holders. The transition process will be undertaken by Environment Southland, and it is critical that its staff have necessary resources to provide a successful and enduring solution. This

will involve a considerable amount of liaison and collaboration with those land holders who must not only be prepared and able, but also committed to accepting their ongoing responsibilities.

Conclusion

The trust hopes that its submission will help council to understand the significant threat that wilding conifers pose at Mid Dome and elsewhere in Southland and that timely and effective intervention is needed to prevent major long-term impacts on and losses to the region.

We look forward to your consideration of the issues we have raised and the requests that we have put forward.



Ali Ballantine MNZM

Chair

Mid Dome Wilding Trees Charitable Trust

6 - Mr Liam Calder

Submission Number: 6 Submission Date: 23/04/24 10:25

Respondent Company/Organisation: Greeting: Mr Liam Calder

Email Address: calderliam0@gmail.com

Environment Southland Long-term Plan

Comment Number: 1

Comment: Do you support our preferred option or do you have another view? Preferred option - Invest more than \$2.3m per annum Do you have any further feedback? nullnull Do you have feedback on the other matters raised or anything else? Shareholding in South Port NZ Ltd Climate change strategy Targeted rabbit control rate Fees and charges Infrastructure Strategy Significance and Engagement Policy Representation Review Feedback on other matters.

As a 17 year old I can't stress enough the need for improved youth engagement in Southland's environmental and regional decision-making processes. While all other councils in the region have youth reference groups, Environment Southland does not, leading to a lack of youth involvement in discussions about the region's future. To ensure Rangatahi stay in Southland, engage with them in THEIR future.

I urge the council to engage with youth through schools, student councils, and youth organisations to ensure that young people are included in shaping the future of Southland. I can not emphasise enough that the council should be leaders that young people can aspire to and calls for greater inclusivity in regional decision-making.

It is time to engage with the leaders of tomorrow. You may think that young people don't care but everyone has an opinion. Teach us but more importantly show us, show us the plans for **our** future. It is time to cross the line between the suits and the students.

Expanding the Enviroschools Programme into high schools has several compelling reasons. Firstly, the programme promotes a holistic approach to environmental education, focusing on the well-being of the entire school, community, and ecosystem. By implementing this approach in high schools, students have the opportunity to engage with real-life environmental challenges at a critical stage in their development, fostering a deeper understanding of sustainability.

Secondly, high schools are where young people begin to form their worldviews and develop skills that will carry into adulthood. By involving high school students in sustainable practices, the programme can create role models who demonstrate these values in their schools and wider communities. This can lead to a ripple effect, as students share their knowledge with family, friends, and peers, spreading sustainable practices and raising awareness about environmental issues.

Thirdly, expanding the programme into high schools can help cultivate future leaders who are equipped to make informed decisions and take action on environmental issues. These students can play a vital role in driving sustainability efforts within their communities, leading to long-term positive impacts. As future leaders, they can bring a sustainability mindset to various sectors, influencing policies and practices at a broader level.

To solve these concerns of mine I am proposing that Environment Southland adopts a youth reference group/youth council to engage and listen to the concerns from the youth in a safe, comfortable and learning environment.

A youth council in Environment Southland is essential for fostering youth engagement and ensuring young people have a voice in regional and environmental decision-making. It provides a formal platform for youth to express their views and contribute to discussions that shape their future. Including a youth council promotes inclusivity, allowing Environment Southland to incorporate diverse perspectives in its policies. This leads to more balanced

and forward-looking decisions. Additionally, a youth council cultivates leadership skills among young participants, encouraging them to take ownership of environmental issues and become active community members. 58 councils in New Zealand have a youth reference/youth council and Environment Southland is missing out on this opportunity to grow closer ties with the community it serves. This engagement helps ensure that the next generation is invested in creating a sustainable and vibrant Southland.

When councillors hear submissions on this consultation document, do you want to present your views in person?

Do you require any support to do so?

Contact Number 02040371846

Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

I would like to submit on how well the Society is running under the ~~ES~~ Environment Southland contract with the Society.

Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.



Yes



No

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Contact details

Name:

Phil Golden

Organisation (if representing):

Southern Pest Eradication Society

Organisation role:

Vice Chairman

Postal address:

*270 Middleton Road Fortrose ROS
Invercargill*

Postcode:

9875

Email:

golden546@yahoo.co.nz

Phone: *0274369743*

Signature:

[Handwritten signature]

We can receive your feedback in a number of ways:



Mail

Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840



Delivery

Environment Southland
Cnr North Rd & Price St
Invercargill



Online

www.es.govt.nz



Email

consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally



Submission to Southland Regional Council Draft LTP 2024-34

Planning Consultant Owen McShane (1941-2012) studied under fabled Aaron Wildavsky, (1930 -1993) who wrote extensively on issues of risk. In 1968 Aaron made the shrewd observation **“that if New Zealand had appointed a minister for the environment, then eventually he would be a minister for everything.”**

The IPCC is government controlled and represents only government opinions – NOT science. SRC and Central government have vastly oversimplified both the problem and solutions of climate change that have led to second-rate policy choices that continue to mercilessly multiply. The climate change issue has been cleverly transformed into an assault on the capitalist system.

The Planners (Bureaucrats) in their countless plans for so called climate-related hazards that could harm our communities have no idea that what they are actually doing is destroying our communities. Why so many elected representatives go along with this unsustainable garbage is impossible to comprehend! Government regulations dealing with the environment, health and safety have reduced public health and safety.

Paradoxically, “there can be no safety without risk.” Waldesky argued it is not only impossible but foolhardy to try to eliminate all risks. The SRC futile costly attempts to mitigate climate change are essentially reducing the wealth of Southland and its people.

The truth is the Southland Regional Council management and the governance arms are a much greater hazard to Southlanders’ well-being than any of the psychological fearmongering scare tactics of climate change. Our democracy has been subverted by environmentalism, like all –isms, can become totalitarian. It is for that reason we ought to tread very carefully - the time is well overdue for their wings to be clipped.

- Transparency and Openness, the hall marks of good local governance are disturbingly deficient
- The **first** I knew of this outrageous draft plan was a couple of days before the SRC advertised it in the Ensign where most people would not even notice it was there. I understand that all ratepayers should have received information in the post. I have no recollection of receiving this mail.

- No reasonable person could possibly work through the copious, complex documents on the SRC website, that are not easy to find
- This draft plan is not efficient and effective, another hallmark of good local governance councillors seem to have forgotten about
- This draft plan has been put together too late to have proper regard to the communities views
- There is no broad mandate that this bureaucratic nonsense will enhance community well-being.
- One of the four well beings “economic” has not been taken into account. No mention has been made on the affordability of constant rate increases and the huge increases in debt to the SRC ratepayers.
- ES has also not taken into account the huge debts of SDC, ICC and GDC. An estimate of the 4 Councils borrowings by 2034 could be \$900 Million. Please note that in the LTP 2021-31 LTP, SRC borrowings were forecast to be NIL by 2029/30.

Some-how in last year’s Annual Plan that was not well advertised, it appears Councillors voted to put in place a new borrowing programme. This was a major departure from the LTP that the public at large were not consulted on. **WHY?**

In the Annual Plan 2023/24 Foreword this statement was made

Our climate adaptation work is well in-train. Environment Southland has set a target of becoming a net zero council by 2050 and initiatives are underway to achieve this.

Please supply the evidence that the target ES has set of becoming a net zero council by 2050 can be delivered.

- The estimated Interest for the SRC over the 10 years is \$24,893 and after 2034 for the next 25 years we will be rated on repaying this horrific debt of \$73M and it seems all councils lack sound budgetary skills, it will be no surprise for the debt to have further increased.
- The proposed average rates increase of 23% will feed inflation at a time the Reserve Bank is strongly trying to limit inflation. The Inflationary effects on rates (5%) are largely unavoidable. Never mind that the people Councillors are meant to represent are faced with the same inflationary pressures they are unable to avoid.

- The proposed **massive** hikes have **NOT** been effectively conveyed to ratepayers or come with the obligatory detail in the LTP for ratepayers to fully understand:
 - flood planning
 - infrastructure expenses, **(14%)**
 - levies commandeered from leasehold reserves **(4%)**
 - the far-reaching **(\$73 mill)** debt
 - the substantial staff increases are intolerable and numbers must be promptly reduced

I do not support ES preferred option of increasing Operating Expenditure by 2.3M per annum for a new flood Protection Infrastructure Rate.

There are more practical, economical solutions to mitigate flooding in Southland.

I support the Mataura Catchment Liaison Committee reasoning in requesting the SRC to pause/delay all aspects of the flood planning and infrastructure rating for at least a year and do what previous councils have done and take their presentation “on the road” to the towns and communities impacted by the 23% rates increase. The major rate increases proposed, need much greater transparency

There is no guarantee that Government resilience funding will come through. I believe the SRC should have the courage to stand up and say NO MORE of tax payer money for unsustainable costly programmes.

The consequences of Councillors’ actions are mostly passed onto others, it is clear that Councillors have the responsibility morally and ethically to do what is right, vote against the Southland Regional Council Draft Long Term Plan 2024 – 2034

Sally McIntyre

1 Wallis Lane
Gore 9710
03 2089321

I wish to speak to my submission

6 - Miss Cheryle Blight

Submission Number: 6

Submission Date: 01/05/24 09:04

Respondent: Miss Cheryle Blight - ICC

Email: samnty@xtra.co.nz

Changing how we rate

Comment Number: 1

Do you support the proposal to have a new Flood Protection Rate?

* No

Do you support the proposal to move the Biosecurity and Land Sustainability rates from land value to capital value.

* No

Do you support spreading the cost of Flood Protection Infrastructure region-wide?

* Yes

When councillors hear submissions on this consultation document, do you want to present your views in person?

* Yes

Do you require any support to do so?

* No

Contact phone number?

0274809912

12 - mr Craig Edgerton

Submission Number: 12

Submission Date: 06/05/24 08:06

Respondent: mr Craig Edgerton

Email: edgerton.craig@yahoo.com

Changing how we rate

Comment Number: 1

Do you support the proposal to have a new Flood Protection Rate?

* No

Do you support the proposal to move the Biosecurity and Land Sustainability rates from land value to capital value.

* No

Do you support spreading the cost of Flood Protection Infrastructure region-wide?

* No

When councillors hear submissions on this consultation document, do you want to present your views in person?

* Yes

Do you require any support to do so?

* No

Contact phone number?

Other feedback

130

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review



insufficient responsible notification
of the increases to rate payers

Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.



Yes



No

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Contact details

Name:

Carmen Stewart

Organisation (if representing):

Organisation role:

Postal address:

Email:

Phone:

Signature:

Page 99

NZ Privacy Act 2020-Principle 11 (1) (c)

Make a submission

To give your feedback, simply complete the form below and on the reverse of this page. Then tear it off and drop it into our office or hand it back to one of our staff members.

Do you support our preferred option or do you have another view?

Due to the challenges of Southland's ageing flood protection network and a changing climate resulting in more severe and enduring weather events we are proposing increased and ongoing investment in the region's flood protection infrastructure and river management to increase community resilience.

Preferred option: Increase operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Infrastructure Rate (see Revenue and Financing Policy Statement of Proposal on Rates – www.es.govt.nz).

This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☒

Another option/view

Do you have any further feedback?

in a time of fiscal difficulty to so many ES decide to increase rates to 100% over 100% this is unacceptable and irresponsible. The public expect fiscal transparency & responsibility. The ES don't show that. Level value rates & not rates on buildings & others the local govt already claim rates for. Change the assessment criteria it's impossible for many of us. It would be far more pragmatic to apply an increase that is consistent with inflation. ES cannot demonstrate any plan work that justify the increase in rates. Time to do permanent work population AND work done.

Subject: FW: Submission

From: CARRAN CHRISTOPHER <hcarran@xtra.co.nz>

Sent: Wednesday, May 1, 2024 7:58 PM

To: Consultation <Consultation@es.govt.nz>

Subject: Submission

Submission to Environment Southland ---10 year plan.

- Present rating system is not equitable. I have suggested change many times and have been ignored.
- Until a formal review of the council activities has taken place I oppose any increase in the rates.
- Any changes in the rating system should be discussed with the ratepayers in a public well-advertised meeting, with individual rate demands and any adjustments, sent out prior to the meeting.

Council has the information, the contacts and with the press of a button the ratepayers can be informed.

- At present council is endeavoring to push through the change without proper consultation. Put the change on hold for 12 months until the council and the ratepayers have had a chance to discuss and debate the issues. The council is there to service its ratepayers and you have a responsibility to be transparent and informative.

In general, the ratepayers have had enough of increase rate demands to the organization that is seen to do what they like.

- During the last few years meetings held in Te Anau have been called river liaison committee meetings. Those meetings should be made open to the general public with the river committee meeting prior.

Minutes of the meetings should be circulated after the meeting, not 12 months later.

Stop treating your ratepayers like puppets.

Chris Carran

0274 874 690

Russell MacPherson

281 Winton Lornvillie Hwy

No 1 RD Winton

russcarolmac@gmail.com

This is my submission to Environment Southland 10 year plan.

Our family have a long association with Southland with the arrival of my great great Grandfather arriving in Southland in the 1860's. I have owned and farmed since I was 23 at 53 I decided to help family into a farm where I equity farm with them.

After attending workshops on the Environment Southland ten year plan, I am concern about the attitude of staff and some councillor's that farmers and people in high value properties have endless ability to pay, the increase on my Lifestyle property in Winton is nearly equal to the total of an average house in Invercargill Environments Southland rates bill. It's not the role of Environment Southland to determine who has the ability to pay, by the size of their capital value. This also effects people in towns were high value properties have higher rate bills with no more services. In Southland we have a shortage of housing, why would you go and build a new house and then be faced with the extra burden of increase rates on that house.

Environment Southland should be encouraging dairy farmers to build wintering sheds to improve environment outcomes, average capital outlay for a wintering shed is about 1.5 million dollars, with simple maths this could equate to about an extra \$750 being paid in ES rates for the first year of the 10 year plan with proposed increases this will be \$1358 in year 10, this amount is only for the winter shed not the whole property. I don't consider this very fair, ES should be encouraging farmers to build winter sheds, let's remember the 1.5 million was probably borrowed.

The uniform charge is the best way to even the rates out; to be fair to everyone, yet in the proposed ten year plan Environment Southland has lowered the Uniform Charge to \$120 from \$143. The Uniform Charge should be at its threshold of 30% of the General rate, this equals about to about \$300 to every rate payer, let's put it in Environment Southland language \$3 per week extra for every rate payer.

In 1987 I bought a property on the Oreti river at Centre Bush , this farm was prone to flooding and had in 1978 and 1984 suffered extreme flooding , I bought this property knowing this, In 1990 the proposed flood banks were built , Farmers paid 30% of the capital costs of these banks and it was certainly worth it. I agree that flood protection should be paid by everyone not only the land owners protected by that asset. The classification of land is the fairest system to rate properties on; we need to recognise that river systems are like a road. But we also need to acknowledge some people benefit more from that asset than others. If ES think that one ratepayer is not paying their fair share then adjust the classification multiplier, it might be a good time to even look at reclassify land, Using capital value to work out benefit is very lazy and not open and transparent.

Predator Free Rakiura

Submission

ENVIRONMENT SOUTHLAND
INVESTING IN SOUTHLAND - WHAKANGAO KI MURIHIKU

Long-Term Plan Consultation

consultation@es.govt.nz

6 May 2024

SUMMARY

1. Te Puka Rakiura Trust (TPRT) thanks you for your support and contribution over many years to a Predator Free Rakiura.
2. We request that you begin work in partnership with TPRT on a Pathway Plan and Biosecurity Border for Rakiura in Year 1 of the Long-Term Plan.
3. We note this is likely to have implications for Environment Southland's LTP in years 2-10. The scope of this will become clearer when initial planning has been completed.
4. We look forward to your continuing role as a key partner in the imminent eradication phase of the project.

Predator Free Rakiura, led by Te Puka Rakiura Trust, welcomes the opportunity to submit on Environment Southland's 2024-2034 Long-Term Plan.

We wish to thank Environment Southland for your ongoing support of, and commitment to Predator Free Rakiura through financial contributions to our vision, as well as the invaluable governance support and staffing arrangements which enable us to pursue a future without rats, feral cats, possums, and hedgehogs on Rakiura/Stewart Island and its surrounding islands and rock stacks.

Environment Southland has had a long involvement in our project including a position on the Predator Free Rakiura Engagement and Advisory Group (formally the PFR Leadership Group) and formally signed up to the Predator Free Rakiura Memorandum of Understanding in July 2019.

Te Puka Rakiura Trust includes an Environment Southland representative as a Trustee, and Environment Southland has provided staffing support to Predator Free Rakiura on an interim basis early in 2024, with a permanent, part-time biosecurity staff member to be seconded to our team from May 2024-2025.

Your continued support will be vital to the success of Predator Free Rakiura - not only in terms of eradication planning and delivery, but particularly in relation to biosecurity development and implementation, as well as the ongoing maintenance of biosecurity borders into the future.

We anticipate that Environment Southland will not only be an interested party in Predator Free Rakiura in future, but a key partner in the overall project.

ES Long-Term Plan: Investing in Southland – Whakangao Ki Murihiku

We are pleased to see formal acknowledgement within ES's LTP Consultation document that one of your commitments is to a healthy environment; *to protect, enhance and restore Southland's natural environment, indigenous biodiversity and its capacity to provide for current and future generations.*

Predator Free Rakiura supports the planned work on the next Regional Pest Management Plan and looks forward to engaging with Environment Southland on the development of this document as appropriate. We assume that work is also likely to begin soon on the Southland Biosecurity Strategy (presently dated 2019-2024) - and hope to have an opportunity to contribute to its revision.

We do note, however, that the LTP consultation document does not offer substantive detail in relation to Environment Southland's commitments to biodiversity and biosecurity work in the coming 10 years. As such, we encourage you to consider the following:

- We request that Environment Southland begins planning for developing a biosecurity border and pathways plan for Rakiura/Stewart Island in collaboration with Predator Free Rakiura and our partners. Our work will start on this plan in the coming year.
- We note that this is likely to have implications for Environment Southland's LTP in years 2-10. The scope of this will become clearer once the initial planning has been completed, but is likely to include staff resources, infrastructure, and a regulatory pathway plan under the Biosecurity Act.
- Predator Free Rakiura's success will not only depend on eradication on Rakiura. Predator control, suppression, and/or eradication will be required at key locations such as Bluff, Riverton, and throughout Murihiku. This, along with Aotearoa's Predator Free 2050 goal should have considerable prominence within any regional council's planning and strategic documents.

Predator Free Rakiura welcomes any opportunity to speak to our submission.

For further information about Predator Free Rakiura, visit www.predatorfreerakiura.org.nz or email info@predatorfreerakiura.org.nz

Signed, TPRT Co-Chairs



Dean Whaanga



Paul Norris

Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

Do you support our preferred option
or do you have another view?

Investing in flood protection infrastructure

Due to the challenges of Southland's ageing flood protection network and a changing climate resulting in more severe and enduring weather events we are proposing increased and ongoing investment in the region's flood protection infrastructure and river management to increase community resilience.

Preferred option: Increase operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Infrastructure Rate (see Revenue and Financing Policy Statement of Proposal on Rates – www.es.govt.nz).

This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☐

Another option/view



Do you have any further feedback?

As per attached

Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.

☒ Yes

☐ No

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Contact details

Name: Sue Allison

Organisation (if representing): Groundswell western Southland

Organisation role: _____

Postal address: Drummond Rd 3 Otoutou Postcode: 9683

Email: groundswellwesternsouthland@gmail.com Phone: 0272336732

Signature: [Signature]

We can receive your feedback in a number of ways:



Mail

Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840



Delivery

Environment Southland
Cnr North Rd & Price St
Invercargill



Online

www.es.govt.nz



Email

consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally

Unfortunately, the bureaucratic system has embedded itself in our local body groups with Environment Southland appearing to embrace without consideration for the rate payer and the endless nonsense that is continuously being adhered to. With a staffing level of 194 and a projected increase of another 7.75 to undertake work outlined in the long term plan the wages bill annually is estimated at \$21,149,000.00 with the rates revenue being \$23,000,000.00 this is clearly unsustainable.

The continuous modelling, employment of 'consultants' and 'specialists' in particular fields take away the commonsense approach that most farmers/community members could support/advise. This itself appears to be a 'gravy train' that would benefit from an overhaul.

Members of the public are heavily stressed in today's recession, and we have witnessed the angst among our friends, families and communities which could be spared in the back to basic, common-sense approach.

The investment in South Port NZ Ltd has had varying results over time. If your proposal is to sell down shares to 51% and re-invest with public consultation to spread risk factors, we support this.

The continuous climate change narrative must be strongly questioned. This is a controversial and complicated topic. What is the cost of this to the rate payer of Southland? Is there an option that further consultation on this topic be carried out within our communities?

Environment Southland states that rabbit control has been contracted out. Our query is to at what cost? What are the contractors' targets and are these being met?

Fees and charges within Environment Southland should be addressed. Is there a double dipping scenario going on within the council as it appears that staff get paid to do a particular job and the rate payers pay multiple times.

Infrastructure and Strategy within the LTP has a crossover effect with other aspects of the LTP. Therefore, it is difficult to break this section down.

The Significant and Engagement Policy once again crosses over with other elements of the LTP.

Is it possible during the Representation Review that Environment Southland delve deeper and look at their staffing within council as well.

Other feedback

129

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
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Please use additional paper if required.

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Contact details

Name:

R. Clowry

Organisation (if representing):

Organisation role:

Dunmore PI

Postal address:

Winton

Postcode:

Email:

Phone:

0276698922

Signature:

Page 108

[Signature]

Make a submission

To give your feedback, simply complete the form below and on the reverse of this page. Then tear it off and drop it into our office or hand it back to one of our staff members.

Do you support our preferred option or do you have another view?

Due to the challenges of Southland's ageing flood protection network and a changing climate resulting in more severe and enduring weather events we are proposing increased and ongoing investment in the region's flood protection infrastructure and river management to increase community resilience.

Preferred option: Increase operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Infrastructure Rate (see Revenue and Financing Policy Statement of Proposal on Rates – www.es.govt.nz).

This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☒

Another option/view

Do you have any further feedback?

During a financial crisis and a cost of living crisis you decide to increase rates!! By a huge percentage! No cuts in staff, no transparency in your spending you just want the money!! Seriously!?

Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

Do you support our preferred option
or do you have another view?

Investing in flood protection infrastructure

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☐

Preferred option

☒

Another option/view

Do you have any further feedback?

See Attached Sheet.

Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
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Contact details

Name:

Sue Hill

Organisation (if representing):

HWR Group

Organisation role:

Group Property Manager

Postal address:

P.O. Box 1104

Postcode:

9840

Email:

sue.hill.co.nz

Phone:

021 774 988

Signature:



We can receive your feedback in a number of ways:



Mail

Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840



Delivery

Environment Southland
Cnr North Rd & Price St
Invercargill



Online

www.es.govt.nz



Email

consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally



9 May 2024

Submission of HW Richardson Group Limited on Environment Southland's Long-term Plan Consultation Document

- HW Richardson Group Limited (HWR Group) is a locally-owned transportation company that is involved in a range of commercial and industrial sectors. We are a large-scale employer in the Southland region, and the owner of a number of commercial and rural properties. HWR Group welcomes the opportunity to submit to Environment Southland on its 2024-2034 Long-term Plan Consultation Document. This submission focuses on the proposal that investment in flood protection infrastructure be funded through an annual rate increase,
- HWR Group acknowledges the importance of investment in flood infrastructure to improve community resilience and ensure a safe living environment for the people of Southland. Improved flood protection infrastructure will have wide-ranging benefits for Southland communities and the regional economy. As a multi faceted company, HWR Group is reliant on critical transportation infrastructure, and will benefit directly from improved flood protection infrastructure that will reduce the potential impact of flooding on the roading network. HWR Group agrees that investment in flood infrastructure is appropriate and supports the transition into alternative approaches to managing floodplains moving forward.
- It is our submission that the proposed rate increase is not the appropriate approach to fund investment in flood infrastructure. The rate increase is substantial and will create a financial burden for Southland ratepayers. Commercial and rural property owners will be particularly impacted, with a disproportionate increase proposed based on the capital value of a property. Commercial and rural property owners are faced with increasing financial and regulatory obligations, and an additional rate increase will result in further financial pressure. The impact of this will be felt directly by property owners, and there will be flow-on economic and social impacts on tenants, farmers, and renters due to inevitable increases to tenancy and rental rates. In an already challenging environment, increased rates for commercial properties will make establishment of new business more difficult and increase the financial pressure on existing businesses.
- HWR Group submits that it would be appropriate that flood protection infrastructure funding be provided solely or primarily by Central Government. Flood protection infrastructure is critical for ensuring community and economic resilience and HWR Group fully supports ongoing commitment to managing and enhancing such infrastructure. However, we submit that investment in flood protection should not be at the expense of the Southland business community.
- Flood risk is a prevalent and significant natural hazard issue across many regions of New Zealand, and increased Central Government funding would be beneficial to communities across the country. As a nationwide issue, we believe Central Government should be taking the lead and providing appropriate ongoing funding that enables flood protection infrastructure to be improved and maintained now and in the future. Obtaining additional funding from Central Government will enable ongoing investment and development while reducing the additional financial burden on Southland's ratepayers and business community. We encourage Environment Southland to retain the status quo and seek additional investment from Central Government.
- We would like to speak to our submission when councilors hear submissions on the Long-Term Plan Consultation Document.

Contact Details

Name: Sue Hill

Organisation: HW Richardson Group Limited

Organisation Role: Property Manager

Postal Address: PO Box 1104, Invercargill 9840

Email: sue.hill@hwr.co.nz

Phone: 021 774 988

Submission to Environment Southland regards proposed changes to flood protection rates

Annie English.

Oreti Riverside landowner ratepayer. Phone 0274755455, email annielenglish@hotmail.com

Postal 370 Mossburn Lumsden Highway, RD 2, Lumsden 9792

I wish to be heard at the verbal submissions and/or my spokesperson Hamish English.

1. Rating system needs to use targeted rates and maximise UAGC

As an Oreti riverside land owner and ratepayer I would prefer that the rating system for flood protection is targeted to local catchments and urban areas using the targeted rates classifications already available and adding a town or project specific rate for new flood protection investment.

The UAGC should be maximised to reflect the general benefits that ratepayers receive from flood protection and targeted rates on those locally benefitting should be used for new investments.

The proposed change from land value to capital value for the general rate seems to be a distraction to the fact that rural landowners would still contribute disproportionately to flood protection for all.

Rural riverside and close to riverside rate payers have for the past forty years funded the bulk of flood protection and river management costs for their catchments. Now that the new flood protection investment is specifically for towns, ES should not be removing targeted rates. Removing targeted rates will not help rural ratepayers who are already burdened with the largest share of flood protection rates.

The town residents and businesses are to receive five times the level of flood protection than that of a rural resident so the rates need to reflect that. Town residents and businesses will be protected for a 1in 100 year flood so many people will never experience the disruption and loss this would cause. However in rural areas the people will be protected for a 1 in 20 year flood so this becomes a bigger issue for disruption to property and livelihoods as well as a disproportionate contribution to the rates.

The proposed new investment in flood protection should be raised using targeted rates for the towns that will benefit. The targeted rate classifications already exist and can be tailored to town sections.

Using targeted local rates for particular projects such as bank raising at Winton and Lumsden as well as the UAGC and general rate contributions would be more reflective of the benefits.

All communities need to be aware of and contribute to the direct costs of their own protection.

2. Reserves stay in the catchment that they were funded from.

Oppose taking reserves into other catchments for any purpose.

As a primary school child in Dipton, our bus route passed over the floodbanks being constructed in the mid 1980s. It was a very vivid picture of the disruption of large scale construction and gave me an awareness of the sacrifices landowners were making for the benefit of the greater good. Now as a landowner I am extremely grateful for the foresight and large financial contributions of those before me.

At my farm at Benmore usually once or twice a year we have floodwater roaring metres deep over the paddocks and sometimes right up to the top of the banks while three or four hundred metres away cars, trucks, vans, bikes, logging trucks, tankers and emergency vehicles continue to drive safely along state highway 6 with no impediment to their day.

This is a great outcome for the community that we can manage to keep our economy operating through adverse weather conditions.

The Oreti River ratepayers purchased farms at the mouth of the river as part of the flood protection scheme. This investment has now resulted in reserves for the Oreti catchment of approximately \$1.6m. This money belongs to Oreti River ratepayers and we have the peace of mind of this to draw on in a serious flood event for rebuilding if that was required.

I oppose a move to regionalisation of catchment reserve funding. It is unfair to have asked successive ratepayers of the Oreti and indeed all catchments to make these contributions then just take the money away.

I am hopeful that ES will maintain the stated intention that funds held in reserves for the different catchment areas will still be applied to those areas and that Catchment Liaison Committees will still continue.

However I note contradictory statements in other documents to the effect that catchment reserves are very much at risk of being taken into the proposed regional funding for floods.

3. Maintain local catchment liaison committees as they are.

Local catchment liaison committees have been a successful representation tool for the local communities for about forty years. These committees provide direct connection to the most affected local riverside and close to river ratepayers.

ES catchment staff are able to use the committee's local knowledge so the appropriate, affordable work can be prioritised for the area according to the agreed budget.

4. Responsive ES staff with local knowledge.

Following a flood event I will be in touch with ES river team Grant Gerrard and Paul Pollard who have been excellent to work with. It is in my interest as a ratepayer who pays a lot of rates to notice any weak points and alert ES. This approach benefits the community as there is incentive to keep ahead of potential fail points.

In a regionally focussed system ES would risk local failings and higher costs for repairs.

5. Ratepayers cannot afford to minimise any and all unknown and unpredictable climatic impacts.

The predictive indications of the climate are only modelling, no one knows for certain what will happen.

Ratepayers should not be saddled with huge increases in ES debt for the misguided effort of preventing most flooding. Service levels and the required expenditure must be sustainable and prudent.

The proposed debt increase from \$18m now to \$73m in ten years is a wildly irresponsible burden on our static and aging population.

6. Lake Hawkins and project management

The lack of ES control on budget and delivery of the Lake Hawkins pump scheme is extremely concerning.

Given the handling of the Lake Hawkins project leading to unexpected large debt, ratepayers will surely oppose ES taking on further debt.

7. ES rules and regulations are restricting the Southland economy.

The needless ES rules and regulations and associated extremely expensive consent costs and monitoring costs are restricting the Southland economy. ES is making it difficult to operate a farming business but expects farmers to absorb continual and significant rates rises. To suggest a 23% rates increase is unacceptable.

ES acknowledges in the Revenue and Financing Policy and rating review 2024 Statement of Proposal that; "Southland has a small, narrow-based economy focused on its primary sectors, particularly agriculture, its related manufacturing sectors and tourism. The economy is almost completely reliant on the use of natural resources, either directly or indirectly."

And yet ES imposes many restrictions on the use of natural resources which is a significant constraint on the ability to earn money and pay ever increasing rates.

ES needs to restrict expenditure in all areas as we have a very small number of ratepayers for a big region. There is an alarming lack of language to this effect. Flood protection needs to be affordable. Rates increases should be a last resort.

8. Waiau.

Parts of the Waiau are presently not rated for flood protection nor are provided with flood protection. It would be unreasonable for Waiau ratepayers to be expected to contribute to the proposed regional general flood protection rate for work in other areas of the region and not receive any local benefit.

INVERCARGILL SALEYARDS COMPANY LIMITED

10 May 2024

Environment Southland
Private Bag 90116
Invercargill 9840

Email: consultation@es.govt.nz

To Whom it May Concern

On behalf of the Directors of the Invercargill Saleyards Company Limited, which owns and operates out of 49 Wallacetown Lorneville Highway, Invercargill (Valuation Number: 2960012702), this letter is a submission to oppose the proposed change to rating system.

We believe there has been insufficient time made available for rate payers to consider the full impact of proposed changes and for Environment Southland to fully consider all possible alternative options. We hold great concern that the proposed changes will not just be limited to rates we incur but will also result an increase in costs for other services we are currently charged for.

We welcome the opportunity to discuss this further.

Yours faithfully

Colin Lindsay
Chairman - Invercargill Saleyards Company Limited
(027) 575 9732

Other feedback

153

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review



Please refer to attached written Submission

Garry and Bev Sweeney

Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.



Yes



No

Please note: Upon request, we are legally required to make all written or electronic submissions available to the public, including the name and address of submitters, subject to the provisions of the Local Government Official Information and Meetings Act 1987. If you consider there are compelling reasons why your contact details and/or submission should be kept confidential, please contact the Council at the address below to make your request known.

Contact details

Name: Garry and Bev Sweeney

Organisation (if representing):

Organisation role:

Postal address: 694 Mill Road North, R.D.6, Inghill Postcode: 9876

Email: gpbjsweeney@gmail.com Phone: 0274755503

Signature: B Sweeney 03 2304047

We can receive your feedback in a number of ways:



Mail

Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840



Delivery

Environment Southland
Cnr North Rd & Price St
Invercargill



Online

www.es.govt.nz



Email

consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally



Submission: Garry and Bev Swney

We are Garry and Bev Swney. We have had a lifetime involvement in dairying and have been dairy farm owners for over 45 years.

We moved to Southland in 1993 and converted a gently rolling 210 ha Morton Mains property to dairying. The day to day operating of this property is done by 50/50 sharemilkers who have been with us for 7 years, with a recently renewed contract until 2028.

We strongly disagree with the moving to a Capital based rating system as we feel we will be unfairly penalised.

The infrastructure on our property is substantial. The original dairy shed has been replaced, as of 2023, with a most up-to-date rotary cowshed with a total build cost of \$2.2 million. Also, and what we consider to be our largest asset, there is a 632 bail freestall cowbarn, with purpose built calving bays. Although all livestock are over-wintered in the barn, 24/7, if at any other time weather and ground conditions are to the detriment of animal or soil health, we have the ability to use the barn.

This building is 172 metres long, and 36 metres wide and had a total build cost (2016) of \$2.8 million, which includes concrete silage bunkers, solid separator and 9 million litres of green water storage. When we realised the storage capacity of the engineer designed, inground pond was insufficient, we built another above ground pond to increase capacity and flexibility. When ground conditions allow, contractors apply the greenwater around the farm three times a year until empty, using an umbilical system. Prior to this, the liquid is tested for the N, P, K, and S percentages and this allows us to apply the effluent at specific rates which are then trac mapped for proof of placement.

The infrastructure on our property adds substantially to its sustainability value – and also from an animal welfare perspective, and fully engages with the ES document, page 19, No 2 “Our land sustainability work supports landowners and managers to have healthy soils and waterways, riparian plantings, and good land management practices, including for waste/effluent, farm plans, grazing and more. The impacts of this work contributes to a healthy environment.”

The above statement confirms our beliefs for the sustainability of our property. Our infrastructure costs to achieve that have been huge. Why should we be penalized in perpetuity by a Capital Rating System?



Craig & Heidi Williams

179 Hills Rd, Waituna

RD1, Invercargill, 9871

03 239 5317

Craig 0274 388 230

Heidi 0273 424 603

craig.heidi@farmside.co.nz

39 - Mrs Christine Smith

Submission Number: 39

Submission Date: 06/05/24 09:16

Respondent: Mrs Christine Smith**Email:** vandc.smith8@gmail.com**Environment Southland Long-term Plan****Comment Number:** 1**Do you have feedback on the other matters raised or anything else?**

* Climate change strategy

* Infrastructure Strategy

When councillors hear submissions on this consultation document, do you want to present your views in person?

* Yes

Do you require any support to do so?

* No

Contact Number

+64212306010

Infrastructure Strategy Infrastructure Strategy**Comment Number:** 2**Do you have feedback on the other matters raised or anything else?**

I submit that Environment Southland and the Invercargill City Council should work collaboratively to undertake dredging to substantial depths of the Oreti River mouth, areas upriver below the Dunns Road bridge and large areas of the New River estuary. The river and sea tidal volumes would then be well contained.

No upriver flood bank protection plan for this river or the Waihopai, which have been shown to fail in other areas of NZ very recently, would be required.

Natural tidal estuary margins could be reestablished and other options for use of the areas could be considered.

Environment Southland

2024—2034 Long- Term Plan Consultation Document

The main emphasis of long-term plan is investing in flood protection infrastructure.

It is my view that to impose a capital value rating system is unfair, inappropriate. and unequitable.

I strongly oppose such a system.

Why not have a rating system based on area. All rate demands contain the area of each individual holding. In heavy rain, water falling on 1,000 hectares of land poses more flood risks than water falling on 1,000 square metres.

When using capital value, you are penalising those that try to improve the environment by erecting wintering barns, fencing of water ways and the like. All these improvements increase the capital value of a property, and it has no relation to the collection water in relation to flood protection. A commercial property of say \$10m will attract a very high rate under a capital value system but may only have a land area of a few square metres, that has a low risk of causing any flooding.

By using a land area-based rating system you could rate the Southland district Council and transit New Zealand for their roading network. Also, you could rate all the parks and reserves, Department of Conservation as there is no area that water does not fall on.

Flooding is caused by heavy or excessive rain falling on property, the larger the property the larger the catchment and the more risk of flooding downstream. By using this system, it is more of a user pays that what you are proposing under a capital value rating base that has no relation to the amount of rain or flooding.

As a council you need to be brave and endeavour to get your rate collection as close as possible to user pays. Stop following what other councils do, or you will rate yourselves out of existence. The compulsory rate payer has had enough of the present bureaucratic system.

RESERVES -----Yes, the council should use them as they are being inflated away. There is no good reason not to. Increasing rates and holding large reserves is simply saying to your ratepayer the council can invest the money better than the ratepayer.

SOUTHPORT SHARES ----Yes you should down sell to 51% . Remember it is the ratepayer that owns those shares so they in turn should be offered first option to purchase.

AMALGAMATION---Your ten year plan does not mention amalgamation. It is high time with the ever-increasing costs and the decreasing population of the Southland area that a Unitary Authority for the area must be of prime consideration. I suggest you need to start the promotion before the ratepayers begin to do so. To continue as present, you will rate yourselves out of existence as will the Southland District Council, Gore District Council and the Invercargill City Council.

At present the ratepayers see the councils as a bureaucratic, dictatorial organisation that sets itself to control the ratepayers. It is them and us. We should be all working together for the betterment of the region and by doing so we can create a much better working relationship that will enhance the region. –One for Southland.

CLIMATE CHANGE----The climate has been changing for millions of years. Yes, it is still changing as we have all experienced and will continue to do so. You cannot fight nature, so you stop spending monies on hypothetical events,
The biggest problem we have has been created by those that want to protect our waterways and do not allow the extraction of the gravel. We as ratepayers need to start holding those responsible for these actions and hold them personally accountable.

PEST CONTROL ----For some time now I have been concerned about the increase in Possums, and the risk of TB. I would like Environment Southland to ask ratepayers, by doing a survey ,about the prevalence of Possums in their area and are they happy with the present method of control?.

GENERAL--- To change the rating system needs input from those that pay the rates. Ratepayers are compulsory shareholders and at all times they should be consulted on any change in the rating system, how it affects them on an individual basis. At present the council is pushing this through without proper consultation and a lack of communication and has failed with its honesty and transparency with the ratepayer.

It is better to take more time than push it through in a rush, upset the ratepayers and in the long term have it wrong.

Submission from John Turner
20 Mokonui Street, Te Anau.
Email –Galehillsfarms@ gmail.com.

Phone –0274 364 665

Make a submission

To give your feedback, complete the form below, cut it out, and drop it into our office, or take a photo and email it to us.

Do you support our preferred option or do you have another view?

Due to the challenges of Southland's ageing flood protection network and a changing climate resulting in more severe and enduring weather events we are proposing increased and ongoing investment in the region's flood protection infrastructure and river management to increase community resilience.

Preferred option: Increase operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Infrastructure Rate (see Revenue and Financing Policy Statement of Proposal on Rates – www.es.govt.nz).

This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☒

Another option/view

Do you have any further feedback?

I AM A PENSIONER
LIVING ON ONE PENSION
POWER, RATES X 2 (DISTRICT COUNCIL
ENVIRONMENT COUNCIL) PHONE,
FOR EMERGENCYS, INSURANCE,
FOOD, FIREWOOD ECT. THERE
ARE WEEKS WG EAT HARDLY
ANY THING. + PETROL. ?!

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

Please use additional paper if required.

I DO NOT HAVE A COMPUTER
ONLY USE MY PHONE TO
RING PEOPLE. ALL I KNOW
IS CLIMATE CHANGE HAS BEEN
HAPPENING FOR OVER 40
YEARS ?! NOW YOU WANT US
TO TAKE UP YOUR SLACK
THIS IS NOT RIGHT !

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so?
Please note that all submissions are considered equally, whether or not you choose to present yours in person.

☒

Yes

SUPPORT
YES.

☐

No

Please note: Upon request, we are legally required to make all written or electronic submissions available to the public, including the name and address of submitters, subject to the provisions of the Local Government Official Information and Meetings Act 1987. If you consider there are compelling reasons why your contact details and/or submission should be kept confidential, please contact the Council at the address below to make your request known.

Contact details

Name: GEOFF & SUSAN SMITH
Organisation (if representing): _____ Organisation role: _____
Postal address: 19 CLIFDEN HIGHWAY Postcode: 9620
TUATAPERE
Email: _____ Phone: 021 452909
Signature: [Signature]

To: Environment Southland
Private Bag 90116
Invercargill 9840

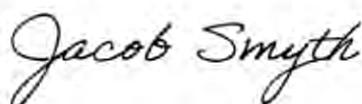
Via email: service@es.govt.nz

Feedback on 2024-2034 Long-term Plan, Proposed Regional Climate Change Strategy for Murihiku Southland (Phase One), and Infrastructure Strategy for Healthy Rivers and Resilient Communities 2024 - 2054

This feedback is provided to Southland Regional Council (SRC) on behalf of the Southland Fish & Game Council. For additional information please contact Jacob Smyth using the details below.

Submitter Details

Submitter: Southland Fish & Game Council (Fish & Game)
Contact person: Jacob Smyth – Resource Management Officer
Email: Jacob@southlandfishgame.co.nz
Office phone: 03 215 9117
Postal address: PO Box 159, Invercargill 9840
Office address: 17 Eye Street, West Invercargill, Invercargill



..... Date: Friday, 10 May 2024

Hearing

Fish & Game wishes to present to SRC its feedback on the 2024-2034 Long-term Plan, Proposed Regional Climate Change Strategy for Murihiku Southland (Phase One), and Infrastructure Strategy for Healthy Rivers and Resilient Communities 2024 – 2054.



Introduction

1. Fish & Game is the statutory manager of sports fish and game bird resources within the Southland region. It holds functions and responsibilities set out in the Conservation Act 1987. The organisation's functions include managing, maintaining, and enhancing the sports fish and game resources of Southland in the recreational interests of anglers and hunters; representing the interests and aspirations of anglers and hunters in the statutory planning process; and advocating the interests of the Council, including its interests in habitats. This feedback has been developed in line with these functions.
2. All river and still water fisheries in Southland are wild and self-sustaining through natural spawning, rearing and recruitment of juvenile trout into the adult population. It is the standing of adult trout that provide the recreational trout fishing amenity and fishery productivity is related to habitat quality and ecosystem health.
3. Similarly, all game bird populations in Southland are wild and self-sustaining through natural breeding, rearing and recruitment of juvenile birds into the adult population. It is the standing of adult game birds that provide the recreational hunting opportunity and productivity of the gamebird population is related to habitat quality and ecosystem health.
4. Fish & Game in the Southland region devote time, funds, and resources to ensuring that the SRC appropriately manage and protect waterways, including the habitat associated with them. This includes ensuring compliance with the Resource Management Act, as well as any resource consents and permitted activities outlined in regional plans.
5. Fish & Game represents the interests of approximately 14,000 fishing and game hunting licence holders in the Southland region (2023 game – 4,625 LEQ's and 2023 / 2024 fish – 8,597LEQ's). Recreational freshwater angling and game bird hunting are woven into the fabric of Southland's cultural heritage.

Feedback on 2024-2025 Long-term Plan

6. SRC proposes increased and sustained investment in Southland's flood protection infrastructure to enhance community resilience through the 2024-2025 Long-term Plan ('the Long-term Plan'). The preferred approach involves a yearly operating expenditure increase of \$2.3 million, to be financed by a new Flood Protection Infrastructure Rate. Fish & Game supports SRC's proposal to use funds from the Flood Protection Infrastructure Rate to invest in:
 - a. Enhancing data collection and analysis for better understanding of Southland's river systems, infrastructure performance, and appropriate mitigation measures; and
 - b. Building expertise and capacity within its catchment team.

That said, Fish & Game has concerns about SRC plans to implement a capital works program throughout the Long-term Plan that focuses on new flood infrastructure, including repayment of debt associated with it. Currently, SRC flood infrastructure comprises 500+ kilometres of stop banks across the region, drainage networks, spillways, dams, tidal gates and pump stations. Reality is that SRC needs to continuously spend money to maintain current flood infrastructure. This is done through ongoing active management of Southland rivers due to their high energy and activity level, as well as maintaining and repairing existing protection measures. Fish & Game is concerned that the proposed Long-term Plan focuses too narrowly on using engineered solutions to protect land, assets, and people from flooding.

River engineering and river corridor issues

7. Many water bodies in Southland FMUs, especially in mid to lower main stem catchments, are regularly disturbed by SRC through its Catchment Management Division, private landowners, and infrastructure owners. Where activities are undertaken within the wetted area, these activities damage or remove habitat. Stream clearing, straightening, deepening, the excessive removal of instream gravel, installation of 'hard' erosion protection, and smoothing / homogenisation of the streambed being the worst culprits in this respect. Often, such activities are undertaken as short-term fixes to larger, systemic problems, including to protect vulnerable infrastructure that is built too close to water bodies or unfit for purpose. The result is that water bodies are interfered with cyclically, going through successive cycles of damage and recovery with ensuing adverse effects on river ecology and natural character.
8. Fish & Game wish to see rivers be able to exist without constant anthropogenic shocks. Every year, Fish & Game receives licence holder complaints about people, including SRC, interfering with rivers. Fish & Game seeks that the Long-term Plan recognises that rivers, ideally, should be being left alone, rather than interfered with. This requires the resolution of the larger systemic issues, such as strategically relocating vulnerable infrastructure outside active river corridors.

For example, reliance on rock lining laterally active channels to protect land and / or infrastructure can facilitate erosion elsewhere - usually on the other side of the river or

downstream, if not immediately around or under the reinforcement. This approach creates ongoing costs and can create safety risks if failure of reinforcement eventually occurs. The erosive pressures of floods on river banks are exacerbated by straightening, confinement and entrenchment of rivers to facilitate human activities and adjoining land uses.

It is not clear to Fish & Game what risk, benefit, and cost assessment methodology is used by SRC to determine the appropriateness of interventionist river works, such as rock lining laterally active channels, including the cost of the original works and ongoing maintenance verses the value of the land and / or infrastructure being protected. With higher and more frequent flood flows predicted with climate change, the pressure on riverbank reinforcements (including erosion protection and stop banks) will only increase, and if the reinforcement eventually fails the consequences will be greater.

9. Climate change predictions for Southland are toward a more dynamic, less benign regional climate, punctuated by more frequent extreme weather events – a regional climate that is warmer and wetter with increased hot days, heatwaves, droughts, and wildfires, as well as more intense rainfalls and flood events.¹ The increasing intensity and extremes can be expected to place additional stress and pressure on riverine and coastal systems, including:
 - a. Increases in average annual rainfall, mostly in winter and spring, which is likely to result in more frequent, intense, and longer duration flood events; and
 - b. Steady increase in coastal flooding, with increasing incidents of pure tidal flooding.²
10. Fish & Game acknowledges that SRC must respond to climate change predictions when managing Southland's river systems. That said, Fish & Game is concerned that little, if any, reference is made in the Long-term Plan discussion document to any funding being allocated to deliver flood protection work through less engineered / nature-based means. Examples strategic retirement of flood prone land, increasing room for rivers to move, reviving old channels (including channel form and sinuosity), creation of wetlands to slow water flow, improving the connectivity between river channel and floodplain, and encouraging the use of two stage channels where hard flood protection measures cannot be avoided. It is unclear what will happen in mid-2025 when funding provided by Ministry for Environment to SRC for its 'Murihiku Slow the Flow Pilot' project³, the aims of which are supported by Fish & Game, expires.

¹ Zammit, C., Pearce, P., Mullen, B., Sood, A., Collins, D., Stephens, S., Woolley, J., Bell, R., and Wadhwa (2018). *Southland climate change impact assessment*. NIWA client report No: 2018120CH - prepared for Environment Southland, Invercargill City Council, Southland District Council and Gore District Council.

² Ibid.

³ The Murihiku Slow the Flow project is intended to pilot a collaborative approach to understanding the feasibility of nature-based climate adaptation solutions (NBS) to reduce the impact on high flood risk areas and reflect qualities of hauora that support the health and well-being of waterbodies within Murihiku Southland. The project involves work with iwi partners, stakeholders, and the community of the Upper Maitara. A collaborative approach is to be used to clarify the problem and identify and test

11. Fish & Game strongly feel that 'engineering' a pathway to resilience against the impacts of climate change solely through the replacement, expansion and / or strengthening of flood protection infrastructure is not going to work in the medium – long term, nor is it consistent with achieving SRC's hauora objective. This is a view supported by:
 - a. River geomorphologists and academic experts across Aotearoa⁴ and internationally⁵; and
 - b. Recent advice provided to SRC⁶, which recommends (among other things):
 - i. A strategic change in the direction of river management over time - away from a 'command and control' ethos, which has dominated practice and proving to be unsustainable, towards a 'living with the river' ethos, emphasizing cultural and multi-generational approaches; and
 - ii. That it is important to work with river morphology and appreciate its natural processes of adjustment, to work with the river, rather than against it. Working with these processes of erosion, transport and deposition means the river is doing much of the work itself, without the need for large-scale intervention.

It is unclear how the intent of SRC to implement a capital works program across the network throughout the Long-term Plan period (2024 – 2034) fits with the above advice.
12. Evidence suggests that rivers are most stable when they are given room to move - when they can safely flood and dissipate their energy and can laterally adjust their course. Internationally, providing 'room for rivers' is becoming standard practice (and some councils, such as Horizons, Tasman, and Wellington, are starting to investigate and implement this approach). Creating room for a river does not just increase its flood capacity and reduce the frequency of flooding either—it also increases the area of habitat for fish and birds, creates more room for riparian wetlands, reduces the costs of flood maintenance work and engineering, and opens spaces for recreation.
13. Minimising economic costs for river management and reducing damage to land and infrastructure can be achieved without compromising the diversity and productivity of the river's ecosystem. For example, recent study of the Rhine and Meuse Rivers, two of the rivers in the Netherlands 'Room for Rivers' program, found that making enough room in the floodplain to lower river levels by 30cm during floods reduces the probability of stop bank failure by 2 - 5 times, and lowering levels by 50cm could reduce the probability of

possible NBSs the learnings which will inform Murihiku Southland's climate adaptation planning and science programmes, and the development of Murihiku's Floodplain Management Approach.

⁴ <https://theconversation.com/why-we-should-release-new-zealands-strangled-rivers-to-lessen-the-impact-of-future-floods-153077>

⁵ García, J. H., Ollero, A., Iribate, A., Fuller, I. C., and Death, R. G. *Promoting fluvial geomorphology to "live with rivers" in the Anthropocene Era*. *Geomorphology*, Volume 380, 1 May 2021, 107649.

⁶ Fuller, I. (December 2023). *Towards Strategic Gravel Management - Working Report to Environment Southland*. Massey University – School of Agriculture and Environment.

failure by more than 10 times.⁷ In Spain, these sorts of changes have been found to be much more cost effective than constantly repairing flood protection infrastructure when it is damaged by floods.⁸

14. Providing room for rivers does, however, require resolution of the larger systemic issues, such as undertaking managed retreat in strategic places for rivers to flood safely. It also means carefully considering the appropriateness of infrastructure location, riverbank reinforcement, gravel extraction, and other 'engineering' work in strategic places.

A useful first step, which has been recommended to SRC⁹, is to fund Natural Character Index (NCI) surveys for entire rivers in Southland. This involves using past and present aerial images to assess changes in river corridor characteristics from river management activities. Funding for NCI assessments should be included in the Long-term Plan to understand Southland river types, degree of modification over time, and potential (or need) for restoration.

By way of example, aerial photos from the 1950s and 2014 were recently used to assess for SRC NCI changes in the Upukerora and Whitestone Rivers over time.¹⁰ This NCI assessment found both the Whitestone and Upukerora Rivers had been significantly modified in their form by narrowing of the river corridor since 1953, including:

- a. The Whitestone river corridor experienced a 50% reduction in active channel area and a 78% decrease in densely vegetated bar area. Wetted channel area and length also decreased by 34% and midline channel length shortened by 11%. Braiding intensity and sinuosity decreased.
- b. The Upukerora river corridor experienced 46% reduction in active channel area and a 54 - 55% reduction in lightly and densely vegetated bars, respectively. Wetted channel area decreased, while total and midline lengths remained unchanged. The upper reaches of the Upukerora retained a partially braided wandering form, but braiding intensity was significantly reduced in the lower reaches.

To restore 'lost' natural characteristics, it was recommended that:

- a. SRC allow the Whitestone and Upukerora Rivers more space to adjust and develop their characteristic forms; and

⁷ Asselman, N., and Klijn, F. (2016). *Making room for rivers: quantification of benefits from a flood risk perspective*. 33S Web of Conferences (2016) - FLOODrisk 2016 - 3rd European Conference on Flood Risk Management.

https://www.researchgate.net/publication/309337830_Making_room_for_rivers_quantification_of_benefits_from_a_flood_risk_perspective

⁸ Ibid.

⁹ Fuller, I. (April 2023). *Natural Character Index (NCI) for Whitestone and Upukerora Rivers - Report for Environment Southland*. Innovative River Solutions, Massey University – School of Agriculture and Environment.

¹⁰ Ibid.

- b. Management strategies should be informed by the original characteristics of the Whitestone and Upukerora Rivers to avoid unsuitable restoration efforts.

Wetland loss, drainage, and flood scheme issues

15. Wetlands were an integral part of Southland's landscape and are particularly important landforms for the protection of biodiversity and provision of ecosystem services, including low flow resilience. Today, the extent and quality of many wetlands in Southland has severely diminished – it is estimated that 90% of Southland's wetlands have been lost since 1840.¹¹
16. Wetland loss is not consigned to the realms of history in Southland. The predominant cause of the ongoing loss of wetlands in Southland is conversion to other land use, typically to pasture used for agriculture.¹² This is particularly the case for small wetlands, or those which have already been modified by human activity.
17. Drainage districts, including flood schemes, and private land drainage have caused dramatic changes in the hydrology of mid – lowland catchments in Southland. Fish & Game's anecdotal experience is that these actions have made catchments flashier with lower base flows. The proliferation of sub-surface drainage, which has been unregulated by SRC, has been particularly effective in achieving this outcome. In addition to this, drainage districts and private land drainage are effective at collecting contaminants (principally nutrients and sediment) and discharging them from point sources directly into water bodies.
18. Fish & Game believes that there is significant opportunity to address issues associated with drainage districts via investment in the creation and restoration of wetlands, both large and small. This belief aligns with recommendations made by the Regional Forum to SRC and Te Ao Mārama in June 2022, including the formation of a multi-agency Wetlands Task Force to promote, support and facilitate wetland development. Regrettably, little progress seems to have been made on this recommendation to date.
19. Fish & Game and its predecessor, the Southland Acclimatisation Society, have a long history of assisting and advising landowners with respect to the construction of open water wetlands in Southland, most being dams located on rural land.
20. Fish & Game submits that the Long-term Plan should recognise and provide funding to assist with the development and restoration of wetlands associated with drainage districts. For example, funding LiDAR data, which provides highly detailed and accurate elevation information, to identify areas that are suitable for the creation of wetlands.

¹¹Clarkson, B., Briggs, C., Fitzgerald, N., Rance, B., Ogilvie, H. (2011). *Current and historic wetlands of Southland Region: Stage 2. Landcare Research Contract Report LC312*, Hamilton; and Ledgard, G., June 2013. *Land use change in the Southland Region*. Environment Southland Technical Report, Publication No 2013-13.

¹² Ewans R (2016). *Environment Southland wetland inventory project: monitoring wetland extent on non-public conservation land in the Southland region – Interim report for 2016*. Unpublished report prepared for Environment Southland, July 2016. New Zealand, Eco-South. 42 p; and Robertson, H., Ausseil, A., Rance, B., Betts, H., and Pomeroy, E. (2019). *Loss of wetlands since 1990 in Southland, New Zealand*. New Zealand Journal of Ecology (2019) 43(1): 3355.

Gravel management

21. The Long-term Plan discussion document makes two passing references to “gravel management” in the context of “immediate flood protection and river management” without elaboration. It is unclear what the intent of SRC is regarding gravel management and what, if any, funds from the new Flood Protection Infrastructure Rate are to be devoted to it, including the inadequacy of current monitoring – clarity on the point is sought by Fish & Game.
22. In some water bodies in the Southland FMU’s, particularly in the mid – lower Mataura and lower Oreti catchments, historic gravel extraction has outstripped the supply of gravel resulting in bed degradation and upstream scouring, exposing the underlying bedrock. Where this occurs, there is not enough instream gravel left within to perform vital ecosystem functions such as providing habitat for invertebrates, cover for small fish or a spawning medium for adult fish. Excessive gravel extraction can also threaten infrastructure property that would otherwise be safe. For example, lowering of the Oreti River bed has caused concern about bridge pier stability.
23. There is currently no cumulative system of gravel allocation at a catchment scale in either the operative Southland Regional Water Plan or the proposed Southland Water and Land Plan, so it is exceedingly difficult for SRC to match total gravel extracted with total supply. This is despite consented gravel extractors being required to make payments to SRC to undertake catchment scale gravel monitoring. Current gaps in gravel monitoring makes it difficult to identify when sustainable limits to gravel extraction are being reached and whether gravel extraction activities align with river management goals. Most often, the first sign of over-allocation is when the underlying bedrock / lignite bed begins to appear, as happened in the lower Oreti and Mataura Rivers.
24. Fish & Game submits that the Long-term Plan should provide additional and ongoing funding for gravel monitoring in accordance with the following recent recommendations made by Professor Ian Fuller to SRC to inform gravel management in Southland¹³:
 - a. Investigating how gravel moves through Southland river systems. This is recommended because rivers act like conveyor belts for sediment, carrying gravel in jerky movements, often in waves during floods - different parts of a catchment are responsible for producing, transferring, and depositing gravel.
 - b. To plan gravel management properly, SRC need accurate data on how much gravel is in Southland’s rivers. This data helps understand if extracting gravel is sustainable and will not harm the river.

To quantify gravel accurately, a comprehensive approach is recommended. SRC should surveying the active river channel both when it is wet and dry to create a three-dimensional Digital Elevation Model (DEM) using Bathymetric LiDAR. By

¹³ Fuller, I. (December 2023). *Towards Strategic Gravel Management - Working Report to Environment Southland*. Massey University – School of Agriculture and Environment.



comparing these surveys, gravel levels change, and river shape changes can be assessed over time.

For these surveys to be informative they need to be repeated at five-year intervals or sooner following large catchment flood events.

Fish & Game feedback on the Proposed Long-term Plan ends.



Feedback on Proposed Regional Climate Change Strategy for Murihiku Southland – Phase One

25. Fish & Game strongly supports the intent of Climate Change Strategy to unite the efforts of the four local government councils in Southland, Te Ao Mārama Inc., and Great South to address climate change through mitigation and adaptation. This includes the four key aspirations of the Climate Change Strategy:
- a. Valuing and respecting the mana of the environment to enable responsive actions to climate change.
 - b. Using science and Mātauranga (indigenous knowledge) as the foundation for responding to climate change in Southland.
 - c. Understanding the changes, challenges, and opportunities associated with climate change and acting courageously to build resilience.
 - d. Creating meaningful change within one generation (25 years) and inspiring future generations to continue this work.
26. Combating climate change and mitigating its impacts are one of the most significant challenges facing Southland. Fish & Game considers that the Climate Change Strategy represents a good start in this regard. In addition, Fish & Game considers that the four local government councils in Southland, including SRC, should seek to:
- a. Contribute to achieving New Zealand's emission reduction targets. This includes considering the emissions from activities that can occur under their respective plans by way of both permitted activities and consents granted; and
 - b. Mitigating the impacts of climate change on communities, including making room for rivers, wetland restoration and floodplain management through the managed / strategic retreat of vulnerable infrastructure and upgrading over time of infrastructure that is no longer fit for purpose.

As previously discussed, managed retreat where property and / or infrastructure are at risk due to water body proximity needs to be actively addressed by SRC, especially in the context of increased climate extreme events. SRC needs to engage with the community to understand the need for managed retreat.

Fish & Game feedback on the Climate Change Strategy ends.

Feedback on Southland / Murihiku Infrastructure Strategy for Healthy Rivers and Resilient Communities 2024 - 2054

27. The Southland / Murihiku Infrastructure Strategy for Healthy Rivers and Resilient Communities ('the Infrastructure Strategy'), has a proposed 30-year time span. Notwithstanding the intergenerational time span, the Strategy has a strong short-term focus on immediate flood protection and river management, including agreed levels of service with the community.
28. Fish & Game acknowledges that the Strategy recognises in passing that:
 - a. It is not viable to keep building higher and higher stop banks; and
 - b. An alternative is nature-based initiatives such as wetlands for water retention, native plantings and restoring old channels.

However, the Infrastructure Strategy provides little additional detail about these matters, including why a change in approach is required over its 30-year life span. Fish & Game considers that the Strategy could be improved by:

- a. Stronger recognition of the challenges posed by climate change in Southland, including frequency of larger scale flood events and frequency of drought / extended low flow events, the latter not being mentioned.
- b. Providing clarity around how and when "*. . . the transition to alternative ways of managing floodplains over the medium and longer-term*" is to occur.

The proposed transition from 'command and control' flood protection / river management in the short term to a 'living with rivers' approach in the medium - long term is not well described in the Infrastructure Strategy, including the need to do so. In short, larger floods, occurring more frequently will require more room to be accommodated. External river engineering advice to SRC is that it is better to accept this reality than endeavour to keep a river constrained in a corridor which is simply too narrow to contain it.¹⁴

SRC needs to engage with the community to understand the need for changes in how it manages rivers, why it needs to work in new ways (from 'command and control' to 'living with rivers') and the proposed timing of changes. Initial community resistance is to be expected - why can't current practice simply continue? The answer is that there is a high ongoing financial and economic cost to attempting to constrain dynamically adjusting rivers in Southland.

- c. Recognising the need to work with Invercargill City Council, Gore District Council, and Southland District Council to limit additional intensification and any new development(s) within river corridors and on adjacent flood plains. Flood damage of existing critical infrastructure will still need to be repaired in the short term, but in the medium – long term less infrastructure, especially new infrastructure,

¹⁴ Fuller (December 2023), p.20.



should not be located where it conflicts with natural processes in the river corridor.

Fish & Game feedback on the Infrastructure Strategy ends.

2024-2034 Long-term Plan Consultation

Investing In Flood Protection Infrastructure

I recognise the importance of planning effectively for flood protection work, however I believe the council should look to re-prioritise their expenditure & not ask the community for more money. The council has lifted rates significantly in recent years. In 2021, General & Separates rates totalled \$19.038m, in the 2025 annual plan this is lifted to \$31.590m, a 66% increase in four years. For the most recent financial period completed (2023), the Council broke even on rates of \$24,001m (capital grants removed from the surplus). You are asking the community for an additional \$7.59m or a 32% increase. These rate increases are not sustainable for the community and will continue to drive inflationary pressures in the economy. The high rate increases in 2022 was justified based on revenue shortfalls from the cruise ship industry. These revenues have rebounded to pre-covid levels & you are again asking for 20%+ rate increase.

The growth in Council staff numbers & costs cannot go unmentioned. In 2022, the annual report disclosed 180 FTE's with employee benefits totalling \$16.858m. In 2023, this has increased to 197 FTE's at a cost of \$19.454m. This plan continues a high growth in staff numbers. With \$24,203m being budgeted, based on average employee costs for 2023, increased by 10% (2 years pay increase), 223 employees results. I reiterate my point above, the community cannot afford this level of service and the council needs to find ways of working smarter and not just ways of building an increased local bureaucracy. Criticism has been levelled at Central Government ministries for employment growth. In 2018, the ES annual report discloses 159 FTE's. This would equate to a 40% lift in numbers (based on my calculated number of 223).

In Summary, do not continue this staff growth trajectory. Use attrition & staff transfers to build a stronger catchment team.

Revenue and Financing Policy

The Council received \$9,084m from Separate rates in 2023 (2023 Annual Report). In 2019 this was \$8.294m. This is a 10% lift over 5 years. Through the mechanism of the Catchment Liaison Committees, there has been strong budgetary discipline in this Council service. As I have discussed above, this discipline is lacking in other services provided by the Council. The previous Government was lauded as the cause of the growth in local government costs. A new government is in Wellington & they are requiring savings from their ministries of at least 6%. A similar expectation on Environment Southland would see cost reductions of \$2.6m (Employee benefits + Other Expenses in 2023 Annual Report * 6%).

I am not against a shift to Capital Values as a basis for raising revenue for all Council Services. I concur with Council's observations that catchment issues are wider than land in close proximity to the main stems of the rivers. The whole community receives benefit from sound management of flood infrastructure. If the Council chose this option, Catchment Liaison Committees would need to be fully involved to ensure community money was not wasted on poorly considered projects.

Shareholding in South Port NZ Ltd

Environment Southland inherited the largest share of the assets of the Southland Harbour Board on its formation post the 1989 Local Government reforms. The Council shareholders agreed to float this asset into a Public Company. SDC sold its shareholding (10% I think) into the float & ES sold its shareholding down to 66.48%. This sale was put into a General Reserve (South Port Share Buy Back Reserve SPSBBR). The Council holds its 66.48% stake at the historical cost of \$8.721m. This would value the 24% sold at \$3.171m. In the 2023 accounts the SPSBBR has now diminished to \$182,000. Notwithstanding anything the Council has said in its Consultation document, I am concerned this erosion of value could easily happen should the Council begin selling some of the South Port shares. The Port is a strategic asset for Southland. The Council should be looking at ways it can enhance the value of this investment for the betterment of the region. It should not be taking a purely portfolio argument and be saying we are overweighted in port assets. Through poor direction from the previous Government on water policy, significant erosion of rural confidence has occurred. This has seen fewer inputs & lower outputs from rural businesses & ultimately lower tonnage across the wharfs at New Zealand ports. The erosion of value is significant, as the table below shows.

Public Listed Port	Sept 2021 Share Price	May 2024 Share Price	Value drop (%)
Ports of Napier	\$3.24	\$2.33	39%
Ports of Tauranga	\$7.38	\$4.80	54%
South Port	\$9.50	\$5.51	72%

On the Council's 17,441,573 shares in South Port, this is an unrealised loss of \$69.592m.

Do not turn your back on this critical regional asset but find ways to enhance its value. This value will see stronger dividend flows which will help in funding Council activities. A strong port business will mean a strong regional economy.

Financial Strategy

A little clarity to begin with. The Council did not invest in South Port, as I have discussed above, the assets were seeded to the council during local government reform in 1989. The Council has held this asset in its balance sheet at historical cost (\$8,721m). On this asset it is received a \$4.709m dividend in 2023. This is a 54% return on the asset it has recorded in its accounts. On page 6 of your draft Financial Strategy document, you are indicating a 3% return on bonds & equities. Why would you reduce the shareholding in South Port to go into bonds & equities? Bonds & Equities are liquid investments and are there to match the reserves, which could be called on at short notice. South Port is a strategic asset for Southland. A strong port will mean a strong region. Do not take a soft option & transfer some of the Council's inheritance into a portfolio investment that will do nothing for investing in Southland's future.

Debt

I am critical of this strategy. Investing in assets that have solid cashflows enables debt to be used as part of the funding methods. These cashflows enable the debt to be repaid in an agreed

timeframe with the funder. If the Council was raising debt to buy South Port shares, this would be sound business. The assets the Council is seeking to raise debt against will provide no certain cashflow. The protection provided by the additional infrastructure may get called upon or it may not. The only certainty is the interest payments on the debt & a repayment profile which will need to be paid for from rates. Some of the Southland TA's are in a debt trap, do not join them. I have more to say on this in the sections below.

Climate Change Strategy

From 2021 to 2024 the Council received \$30.458m in capital grants for shovel ready projects. It will have also committed around \$18m of community money to these projects (debt balance in the draft Financial statements). The other TA's in Southland also applied for government funds for shovel ready projects. Some of these had climate change justifications. Based on what ES spent, well north of \$50m has been spent on the mitigation of climate change risk (flood & inundation protection). Rate payers in Southland are not a bottomless pit for project money. Every project identified needs scrutiny for reasonableness over other competing projects for community money. The TA's are in a fiscal bind over Three Waters projects which have escalated out of control. Do not add more pain to the region in the form of debt to be repaid, on a notion that we may still be at risk from flooding assessed from climate change modelling.

The Council & central Government has invested in LIDR for the region. Look at the data on gravel build-up around critical infrastructure and facilitate its removal. Properly maintain the existing bank infrastructure before diverting new funds into topping up banks. Any new bank infrastructure should be supported by the Catchment Liaison Committees.

Infrastructure Strategy

Environment Southland (ES) has given significant thought to the infrastructure needs for Southland over the next 30 years. Banks can't be built at short notice & therefore sound planning & prioritising is required. As I discussed above, there has been some catch-up spending in the province, precipitated by central Government seed money. At the conclusion of this, the Council is showing \$18m of debt that the community must service & repay. The infrastructure plan sees significantly more debt being incurred, with no sign of it declining by 2034. With knowledge of what other Southland Council's are grappling with, I don't believe this strategy is affordable for the region.

ES is fortunate to own a significant share of the port company & to own a large, leased land area. I believe it is time for the Council to re-set its business model & be true to its "Guiding Financial Principles" (GFP), particularly point 1. The Council should not be using the South Port Dividend to off-set the general rate. This money should be used for investment in the province, with particular emphasis when it can attract central Government money on a 1:4 basis.

As your own demographic report shows, our population is growing slower than the rest of the country & is aging. Saddling debt on to the next generation may seem appealing, however it could be detrimental to the longer-term commitment of people to this region.

In summary, use investment income to fund the region's infrastructure upgrades and not more debt. Pay down the current \$18m of debt to allow headroom for future unforeseen events (GFP 3).

Fees & Charges

I am concerned that the Council is using "single provider option" to escalate fee structures. In 2022 fees were increased by 20%, well above levels of inflation. The Council is again going for double digit rises in many fees. In an environment where inflation is trying to be contained, the Council is showing ignorance to this by rocketing up fees. Fees should be lifted by no more than inflation for 2025. Invest in technology to avoid sending white trucks for data collection. Further examine ways for resource holders to have a lower cost of service with the council. New Zealand businesses competitiveness has eroded following the last Governments many failed policies. You are reading the news on the Sheep & Beef sector struggling to breakeven & dairy only marginally better. The rural sector is not a bottomless pit for fees & charges. Review these schedules & only increase them for the rate of inflation.

Thank you for reading my submission.

Regards,

Allan Baird CA

761 Dipton – Winton Highway

RD1 Dipton 9791

021 44 84 94

I would like to talk to my submission.

To The Chairman & Councillors
Environment Southland
Price Street
Invercargill

D.J.Marshall
532 Taramoa Road
Invercargill 9874
11/05/2024

Submission against the 2024 long term plan

As leasees of Environment Southland for 43 years we write this submission without prejudice

Too short of consultation period which has been poorly advertised

Lack of rating options offered for consultation

Money collected in the catchment , should be spent in the catchment, The Oreti ratepayers contributed to the payment of the hundreds of acres purchased in the 1980s hence the surplus returns from these blocks should be spent in the Oreti catchment, the same with the Maitai.

More good practice within Environment Southland with expenditure and accountability (eg Stead Street pumps for Lake Hawkins)is needed before further borrowing is entered into.

Ratepayers cannot afford the rates increases and user charges proposed for the next 3 years.

I would like the opportunity to speak on my concerns

Regards Dave Marshall

027 2051895

benatradeangus@outlook.co.nz



Subject: FW: Submission: LTP 2024/34 - Climate Change Strategy in Murihiku

-----Original Message-----

From: David and Chris Henderson <henderson.farm@gmail.com>

Sent: Sunday, 12 May 2024 8:57 pm

To: Consultation <Consultation@es.govt.nz>

Subject: Submission: LTP 2024/34 - Climate Change Strategy in Murihiku

Chris Henderson

59 Walker Road, No 4RD, Lumsden 9794

Tel: 03 248 7605

Thank you for the opportunity to submit comments on these important Plans. I have combined comments where appropriate.

David and I are semi-retired arable and sheep farmers in Northern Southland.

I am a former Primary and Secondary school teacher(Art).

I am a member of Federated Farmers, Forest and Bird, am on the Waiau River Working party, and a former Guardian of Lakes Manapouri, Te Anau and Monowai.

I remember the Lower Waiau when it was the second largest river in New Zealand with an average flow of 550 cumecs.

I remember watching the devastation wrought by cyclone Bola, the millions of tonnes of top soil lost and the replanting of the damaged areas with pines.

Both are examples of putting economics before environment, which continue to the present day.

Only when we realise that we rely on the natural environment for everything will we get our planning right.

The cost of not doing so is already proving catastrophic on so many levels, not just in our country but world-wide, which is why this Hearing is so timely.

Investment in Flood Control infrastructure Reinstate full protection of upper catchments, the restoration of original indigenous cover, no further exotic plantations, no carbon forestry unless it is of native species, reinstate Rabbit Boards with a wider requirement to target all feral animals- deer, pigs, possums, ferrets, stoats and feral cats, as their impacts compromise the ability of native forests to protect biodiversity and soil and water values.

Provide rates remission to land owners who may be affected by requirements to protect upper catchments. They may also be awarded Carbon and Biodiversity credits in future.

Those groups dedicated to catchment protection and biodiversity enhancement need to be assured of continuing financial support as an investment rather than a cost. Their involvement is effective, inspirational and a practical response to the immense challenges of Climate Change.

I am delighted to note that the importance of wetlands in flood mitigation is recognised at last with a Wetlands Group being planned. The bonus of carbon sequestration and biodiversity enhancement will be the reward for this important initiative as will upper catchment protection.

Gravel

The continued 'mining' of aquifers for unsustainable irrigation affects the aquifer levels, possibly the aquifer ecosystems, the water table, and the flows of rivers and streams.

Carefully designed shelter belts which could also be biodiversity corridors would reduce the evapo-transpiration levels of pastures or crops by up to 46%, as well as providing stock shade and shelter, thus reducing the need to irrigate.

Gravel build-up is the inevitable result of reduced water flows.

It is pleasing to note the formation of a Gravel Group to address this issue, as the impacts on ecosystems, river bed heights, coastal processes, lagoons and estuaries, and ultimately the receiving waters of the oceans are well known.

Allowing rivers to use more of the original flood plain would help to slow it's movement towards the coast, and should be part of future planning as communities face change. Potentially affected landowners should be compensated where appropriate for allowing this to occur periodically.

Insurance companies are increasingly reluctant to finance restoration of homes and businesses in flood-prone areas so forward planning for possible relocation of them will be essential.

If serious flooding should occur, despite our best efforts, a policy of negawatts (every watt saved is a negawatt) should be considered, as well as distributed energy and rain water capture to ensure water and power are available for households and other entities when usual supplies are disrupted. The looming loss of the copper telephone land lines is problematic as reliance on cellphones was compromised during Cyclone Gabrielle - a recent example. Having cash in times of disruption is another sensible alternative should systems go down for whatever reason.

Any Southland Energy Strategy will need to ensure landscapes, rivers, soils, and biodiversity are not sacrificed for the production of Hydrogen or to provide energy for data centres.

Meaningful public consultation needs to occur to ensure we do not keep making decisions based on economics at the expense of our environment on which we all rely.

We are now in the Age of Nature where we must put it first and then base economic decisions on restoring or enhancing our environment.

An example is continued mining for gold, rather than recycling E-Waste as a more efficient alternative for retrieving gold and other precious materials. At present I understand New Zealand recycles only 2% of E-Waste.

Having to pay rates to deal with waste often produced by the packaging industry and unable to be recycled, reused or composted also seems counter-intuitive.

Careful extraction of excess gravel to replenish coastal margins already eroded, or at risk of erosion, would be a positive response to the crisis already apparent in many areas, including at Bluecliffs.

Restoring original courses, and in the case of the lower Waiau the river mouth and bar barrier, is a recognition that the river has paid a terrible price for the decision fifty years ago to take the huge flow and redirect it through West Arm Power station to provide electricity for the Smelter.

Restoring the original main stem, lowering the raised bed and redirecting the present flow away from Bluecliffs would be a better use of the \$7million at presently earmarked for the creation of an alternative route for flows to prevent algal blooms in Summer.

The present flow regime, going from 550 cumecs average historically to between 14 and 16 cumecs with some additional flows, gives a lie to the description of sustainable electricity, bordering on 'Green wash'.

The ratepayers of the District Council and Environment Southland should not have to pay to redress the impacts of this historic decision. Meridian and its major shareholder the Government need to finance the restoration of this once magnificent river.

Removal of gravels built up in other rivers will require care to ensure habitats crucial to the survival of gulls and other birds are protected and enhanced.

Other Climate initiatives.

Pursuing the reinstatement of a passenger rail service from Invercargill to Christchurch.

Sharing an earthquake proofed H and J Smiths building with the Invercargill City Council and the Southland District Council and leading by example the adaptive reuse of existing buildings which have a lower carbon footprint than new buildings made from concrete and steel, for new creative uses including as tourist attractions in their own right.

I am pleased to note the inclusiveness mentioned in the Climate Strategy.

That is critical to our survival, and is vital to our success.

We need all our creativity, courage, intelligence and humanity to ensure our amazing world is fit for all future inhabitants.

This Plan is a very positive start!

I wish to speak to my submission.

Your Sincerely,
Chris Henderson

Oreti Catchment Liaison Committee

Submission to

Environment Southland's Long Term Plan

While our Co Chairs were very happy participating in the Council workshops when the plan was being developed we are disappointed and completely surprised at the outcome. We are concerned about our Liaison committee's future and the community input via our committee into Environment Southland (ES). The Oreti Catchment Liaison committee (OCLC) represents ratepayers from the entire length of the catchment with around 40 people as members of our Committee.

The change of rating system

We oppose the change to the proposed "one pot" capital value rating system.

We believe the proposed system will lead to less transparency and less accountability. We believe Liaison Committees have proved their worth with common sense input into budget's and plans. Significant savings, efficiencies, and better service provision have resulted. Under the proposed rating change a single Liaison committee would be a logical outcome diluting local scrutiny.

We would like ES to explore other catchment rating options

There are plenty of ways to spread the load of rates within the catchment. The existing classification system could be tweaked with the F class classification paying a greater percentage of the rate. A greater share of the General Rate (Capital Value) currently 30% with a smaller percentage of targeted catchment classification rating also a possibility. Whatever systems that are modelled they need to support the current catchment rating model.

We have no way of modelling any system so while we put suggestions forward cost modelling would help us determine our preferred option.

What is clear is that we oppose the only model you have put forward.

More consultation is needed with Catchment options modelled also giving ratepayers transparency and proper consultation rather than a railroaded single model

Reserves

We Oppose any of our Oreti reserves being used in any other catchment .

We are really shocked that the Draft Reserves policy would allow any of our reserves to be used Southland wide. Money from the Oreti must only be used in the Oreti Catchment.

We oppose the draft Reserves policy in it's current format it is particularly disappointing there was no liaison when drafting or even a mention of Liaison committee's in the document . As if we do not exist but maybe that is your true intention ???

Capital Projects

It is really bad practice to spend money first and then worry how you are going to pay for it.

This is exactly where ES have got to and although the shovel ready projects of \$18 million are largely finished. Funding is undecided ?

A recognised way to look at funding is using the principal of the beneficiary pays.

With the Lake Hawkins pumps with a cost of over \$9 million the beneficiary is the airport.

Therefore some sort of passenger tax is required to service and pay off the loan.

We oppose any idea of using any Catchment reserves for a Southland wide benefit.

The rest of the shovel ready projects have direct benefit to Invercargill, Wyndham, Mataura and Gore. Funding the interest and Capital repayments should again come from the Direct Beneficiaries That is the precedent set by the Oreti scheme .

The projects yet to be built Lumsden, Winton and a second retention dam on the Waihopi should also follow that principal and give those affected an idea of cost before work goes ahead.

We also expect landowners on the west side of the proposed higher banks around Winton and Lumsden to also be consulted as it would seem it could lead to a greater possibility of flooding and considerably lower level of service . Some talks are needed around what compensation would be required ?

Bank Condition

It would seem little is going to the rural stop banks over the term of this LTP as urban is your focus. The OCLC requested at our AGM that a greater focus be put on Grade 5 defects . While the App records all defects it is hard to pinpoint how many Grade 5 defects there are , where they are , and no plan to prioritise and diminish these. It is hard to believe there is no one whose job is focusing on these, liaising with farmers and prioritising a plan of action. Catchment Division only has a staff of 12 from a total staff of 202 (including part timers) as at March 29th.

We have asked for more staff for the Catchment Division previously by redeployment from other divisions in ES not new staff.

We mentioned at our AGM we are open to some of our lease reserves being used as a pilot project to help reduce the worst historical grade 5 defects on our Oreti Stop banking system .

Tough Times

With a cost of living crisis, huge increases in interest, depressed farming incomes, and a country in recession now is not the time to have huge rate increases. While your ratepayers are cutting costs wherever they can we do not feel you have done the same. With a massive change signalled in Government policy and a directive that you go back to core business we believe there are many areas where savings could be made to help fund your catchment focus. However a much stronger handle on staying within budget on projects is needed and demanded by your ratepayers.

We your ratepayers do not approve a spending plan to indebt this council to the tune of over \$73 million in 10 years with the lack of detail about that in this plan.

Summary

Our Oreti Catchment Liaison committee has always said we will sometimes tell you feedback from our OCLC ratepayers you may find difficult, although we would hope that the Council will give our submission enough respect to listen to our concerns.”

Co chairs OCLC May 12th 2024

David Rose Dave Marshall

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13 May 2024

BY EMAIL consultation@es.govt.nz

SUBMISSION ON THE ENVIRONMENT SOUTHLAND COUNCIL LONG TERM PLAN 2024-2034

Introduction

1. The Royal Forest & Bird Protection Society Inc. of New Zealand (Forest & Bird) is Aotearoa New Zealand's leading independent conservation organisation. Forest & Bird has played an important role in protecting and preserving New Zealand's environment and native species for a century. Forest & Bird is independently funded by private subscription, donations, and bequests.
2. Forest & Bird has for many years had a strong interest and involvement in protecting and restoring nature on land, in freshwater and in the ocean, throughout the country including Southland.
3. Forest & Bird has an active volunteer branch in the Region. Apart from a variety of other conservation work it supports, the Southland Branch manages two Forest & Bird owned reserves.
4. Forest & Bird is grateful for the opportunity to provide feedback on the Council's Long-Term Plan and acknowledges the work that staff are doing to improve the Region.

Nature Based Solutions

5. Nature Based Solutions (NBS) are approaches that utilise the inherent power of nature to address various environmental challenges while providing co-benefits to human societies. As the world faces complex environmental problems such as climate change, biodiversity loss, and natural resource depletion, nature-based solutions offer a promising avenue for sustainable and holistic solutions.
6. NBS plays a crucial role in mitigating climate change by absorbing and storing carbon dioxide. Forests, wetlands, and other natural ecosystems act as carbon sinks, sequestering large amounts of carbon and reducing greenhouse gas emissions. Restoring and conserving indigenous forests, implementing

indigenous afforestation and reforestation projects, and protecting coastal ecosystems like estuaries all contribute to carbon sequestration, helping to stabilise the climate.

7. NBS supports the preservation and restoration of biodiversity. Healthy ecosystems provide habitats for a wide range of species, ensuring their survival and promoting genetic diversity. Preserving biodiversity is crucial for the functioning of ecosystems, as it contributes to pollination, seed dispersal, and nutrient cycling. By conserving and restoring natural habitats, NBS help safeguard numerous plant and animal species, protecting the delicate interdependence of ecosystems.
8. NBS in urbanised/township areas improve resilience and liveability by creating green spaces, enhancing air quality and mitigating urban noise. Urban forests, parks, green roofs, and vertical gardens enhance biodiversity, absorb pollutants, and provide cooling/shading effects, making cities more sustainable and enjoyable for residents. NBS also contributes to mental and physical well-being, offering recreational spaces and connecting people with nature.

Links for resources/references:

- <https://helenclark.foundation/publications-and-medias/sponge-cities/>
- <https://www.britishecologicalsociety.org/wp-content/uploads/2022/02/NbS-Report-Final-Updated-Feb-2022.pdf>

9. **Forest & Bird seeks that Council prioritises exploring nature based solutions to manage flood protection and river management, as well as increasing the region's resilience to climate disruption. This can be achieved in a number of ways, including making room for rivers and restoring and enhancing wetlands in the region.**

Room for Rivers

10. The LTP acknowledges the need for 'planning and positioning for the transition of floodplains in the medium-long term' however there appears to be no clear pathway for this to occur other than some research and a limited trial. The LTP also acknowledges that it is not viable to create higher and higher stopbanks despite the capital works programme focusing on built infrastructure to manage the impacts of an increase in storm events. This comes at a significant cost to the environment and all ratepayers.
11. Making Room for Rivers is a long-term, evidence-based, cost-effective approach to living with rivers and flooding, which recognises that rivers move and adjust over time and need more space to flood safely. Making room for rivers keeps communities safer, costs less, and is better for our wildlife than hard engineering approaches – and accounts for future climate change impacts.
12. We ask that Environment Southland incorporates making room for rivers in its capital works programme and this should be supported by initiatives in the LTP. For example, Wellington Regional Council invested in its RiverLink project to widen a section of Te Awakairangi/the Hutt River through its 2021-2031 Long Term Plan.

13. Forest & Bird has presented to most regional and local councils about the benefits of making room for rivers, and we now urge you to invest in programs to support this kaupapa and to give this priority over built flood protection and infrastructure. . Council can refer back to Tukua Ngā Awa Kia Rere/Making Room for Rivers for more information.
https://www.forestandbird.org.nz/sites/default/files/2022-11/F%26B_Room-For-Rivers_Report_online_0.pdf
14. Braided rivers are a unique ecosystem, found in few parts of the world. They define the Southland landscape. Further constraining of river flows by continuing to build mere and higher stopbanks risks diminishing the braided system resulting in fewer islands for breeding habitat. Southland is a national stronghold for the Black Billed Gull, the most endangered gull species in the world. The braided rivers are habitat for other At Risk or Threatened species such as the Black Fronted Tern and the banded Dotterel .
15. There has been on-going loss of important forest remnants due to the creation of stopbanks. These are already highly fragmented, and any further work on built infrastructure to manage rivers will result in further loss.
16. The extraction of gravel to provide material for stopbanks and other built infrastructure to manage rivers will also impact on the river flow and further contribute to the risk to biodiversity and constraining river flow. .
17. **Forest & Bird seeks that the LTP acknowledges the importance and uniqueness of braided rivers and the urgency to transition towards nature based solutions. It seeks that this work is incorporated into the capital works programme and not deferred any longer.**
18. **The LTP should ensure there is adequate provision for funding to progress the development of an action plan as part of the Climate Change Strategy.**

Wetlands

19. Transitioning from the conventional way Council has managed flood events should also take into account the importance of wetlands. Restoring wetlands is a cost effective way of contributing to managing water and mitigating flood events. It will mean less piped infrastructure, increase areas of mahinga kai and provide habitat for a large percentage of our native bird species, including threatened and locally rare species.
20. Southland, along with the West Coast has the greatest number of wetlands in Aotearoa/ New Zealand, especially estuarine and peat wetland systems. Wetlands have an important function as carbon sinks . Peat wetlands, such as those that remain in Southland are particularly useful. Wetlands help build resilience against the impacts of flood events., and an important source of mahinga kai.

N.B Forest & Bird has mapped areas of lost wetland on public land that could readily be restored, and this data is publicly available on the Koordinates website. We ask ESI to invest in an analysis of the feasibility of restoring these areas where such local work hasn't already been undertaken.

<https://koordinates.com/layer/113000-areas-of-historic-wetland-that-are-now-grass-but-still-in-public-owner-ship-sept-2022/>

- 21. Forest & Bird seeks that Council increase funding for investment in wetland restoration and enhancement projects, and for this work to be properly integrated into the flood protection work proposed.**

Biodiversity and Biosecurity

- 22. The region's biodiversity is in crisis, as it is throughout Aotearoa New Zealand. Their tenuous state is exacerbated by the increasing impacts of climate disruption. The Jobs for Nature programme enabled the Council to increase resources to protect and enhance the region's biodiversity.**

- 23. Te Rere Reserve is a significant reserve with important natural values from the mountains to the sea. It is habitat for a breeding population of Yellow Eyed Penguin, the rarest penguin in the world and whose numbers have been decreasing over the last few decades to a worrying extent. The vital work at the reserve, primarily carried out by volunteers, has been partially supported by the ES Enhancement Fund and by the Biodiversity Team at Environment Southland.**

Climate Change brings the risk of new pest species being introduced to Southland, along with a greater ability for some pest animals to survive. Pest animals and weeds are a significant risk to our natural world.

- 24. Ungulates, such as deer, undermine indigenous forest integrity. Forests play an important role in storing carbon as well as being a significant habitat for threatened indigenous plant and animal species.**
- 25. Added to this high numbers of ungulates create a negative externality requiring landowners, seeking to restore forests on their land, requiring spending limited resources on reducing high deer numbers to protect this restoration work. It is also an increased cost to landowners who need to manage them for agricultural reasons.**
- 26. Forest & Bird seeks that the level of funding provided by Jobs for Nature is maintained to ensure the gains made as a result of this funding is not lost. This should include providing on-going advice to landowners and seeking opportunities for further restoration and enhancement work.**
- 27. Forest & Bird seeks that there is on-going support of conservation and catchment groups to assist the region in protecting and maintaining its important indigenous species and habitats. These groups will be important to help achieve the aspirations set out in the proposed Regional Climate Change Strategy.**

28. **Forest & Bird seeks that the LTP acknowledges the increased threat of pest species in Southland as a result of on-going climate change, and ensures there are sufficient resources to manage or eradicate, where possible, pest species. This should include sufficient funding towards the review of the ES RPMS.**

National Policy Statement on Indigenous Biodiversity (NPS-IB)

29. Despite the current government indicating they wish to pause this requirement, identification of SNA's is still a legal requirement of the NPS-IB and must be completed by 2028. Forest & Bird encourages the council to invest in the on-going identification of Significant Natural Areas (SNA's) to ultimately provide the basis for objectives and policies within the regions policy statement..
30. Forest & Bird sees the LTP process as an opportunity for the council to indicate the extra resources required to identify SNA's within the Region using the identification criteria set out in NPS-IB Appendix 11. We suggest starting off the process by assessing council owned parks, reserves and other land, then continuing to other public and private property.
31. The NPS-IB states that an area of Crown-owned land may automatically qualify as a Significant Natural Area (SNA) without assessment if it is a scientific, scenic or nature reserve under the Reserves Act 1977, a sanctuary area, ecological area, or wildlife management area under the Conservation Act 1987, or an isolated part of a national park (3.8 (8)(c)(iv)).
32. It is important to highlight that previously established activities on SNAs which are identified through the above process, must have their adverse effects managed (as in NPS-IB 3.15(2)).
33. The NPS-IB (3.16(3)) requires councils to make or change its plans to be consistent with 3.16, managing effects on indigenous biodiversity outside SNAs by applying the effects management hierarchy in the NPS-IB (set out in 1.6).

Te Mana o Te Taiao

34. Environment Southland should, through their LTP, recognise that nature is at the heart of the Aotearoa economy. Restoring nature will also help us to address the current impacts of climate change and be more resilient to future impacts likely to result in increasing flood events. .
35. Te Mana o te Taiao includes goals that will make the roles and actions of local government clearer and easier. The council should familiarise themselves with these goals and actions and fund them appropriately.
36. Upholding the principles of the Treaty of Waitangi is an essential part of Te Mana o te Taiao. Working together in partnership towards a shared vision for nature will ensure that rangatira (chief) and kaitiaki (guardian) obligations, as well as mātauraka Māori, are actively protected.

We welcome any questions on our feedback and would be happy to discuss further.

The Royal Forest and Bird Society of New Zealand Incorporated wish to be heard in support of this submission.

Kā Mihinui



Chelsea McGaw

Regional Conservation Manager (RCM) – Otago and Southland

Royal Forest and Bird Protection Society of New Zealand Incorporated.

c.mcgaw@forestandbird.org.nz

and

Southland Forest & Bird Branch

southland.branch@forestandbird.org.nz

Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

Do you support our preferred option
or do you have another view?

Stop Spending money we cannot afford to
Investing in flood protection infrastructure

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Preferred option: Increase operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Infrastructure Rate (see Revenue and Financing Policy Statement of Proposal on Rates – www.es.govt.nz).

This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☒

Another option/view

*get rid of E.S. No need for
\$ SNC.E.S. let local
Councils have the say less stuff have to spend
on things going wrong not wages.*

*I think Council's take far too
much money in Rates as it is
its totally ridiculous how you
cannot afford to fix everything
that needs to be fixed.
With the money you already
gather as your E.S. Rates have
doubled, don't come to us for
money - Taxers are paid is huge
amounts nation wide billions.
I ask the Question where does
it all go? Enough is enough*

Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

Crap
Farmer's and SDC
Find ways to not spend
our money on crap
we do, not give you
Permission

So Spend money on any of these things. we need to live and eat and have a life not

extra bills with ES and Rates we pay nearly \$4000 4 Times the amount

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.

20 years ago. where does the money go not in our area.

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maybe wages, not action.

Contact details

Name: *Ron Baxter*

Organisation (if representing):

Organisation role:

Postal address: *18 Kavanagh St Nightcaps* Postcode: *9630*

Email: *Ron.Baxter@main.com* Phone: *0204080149*

Signature: *Ron Baxter*

You want to do something check over water two police officers "check" and power all over

We can receive your feedback in a number of ways:



Mail
 Freepost Authority No. 247418
 Environment Southland
 Private Bag 90116
 Invercargill 9840



Delivery
 Environment Southland
 Cnr North Rd & Price St
 Invercargill



Online
 www.es.govt.nz



Email
 consultation@es.govt.nz

and fac

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally

Tell us what you think

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YOUR SAY**

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or do you have another view?

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☐

Preferred option

☒

Another option/view

Do you have any further feedback?

See attached please



**This is an Attachment to Environment Southland (ES)
"Tell Us What You Think"
2024 - 2034 Draft Long Term Plan Submission Process**

Investing in flood protection infrastructure ?

I VOTE ANOTHER OPTION Please !

I vote ES halt most major flood bank work planned in the LTP.

I vote No

because I believe the proposed plan is not the best financial option, nor the most effective or most environmentally friendly way to control the flow. In my opinion it is short sighted. ES must find a better balance with this work by including more works like Mataura Slow the Flow.

The timing of this MASSIVE BUDGET INCREASE will cause serious financial hardship for many families especially on the back of COVID 19. Many are struggling to meet financial commitments now, you say just a few extra dollars that is because you have a few extra dollars ... many young and single income households do not ! They could lose their homes because of this. Get out in your community please ... like ... really get out in the community !!! PLEASE

HALT THE LTP ... I find the LTP consultation process inadequate and your consultation mostly indirect.

I do not believe the Council have met their obligation to consult with the rate payers who voted them on.

I vote in favour of using some of our 25 million reserves to attend to only urgent work required on flood banks (to a Level 3 standard only).

Other Feedback

All this talk about flood banks and Hawkes Bay (continually) ! If we are going there then let's look at our Civil Defence.

CIVIL DEFENCE

Is it up to standard ? NO Was Hawkes Bay's ? NO

Can ours be improved greatly ? YES

Should ours be improved immediately ? YES ! It is negligence not to do so

I must sincerely apologise I can not comment on the more positive points in your LTP. I received notice of the LTP too late to investigate all topics fully ... so it was necessary I opt for spending the short amount of time I had on the frightening 286% forecast of debt increase.

18,968,000 (2025) to 73,273,000(2034) Surely councillors can see the forecast increase is THREE FOLD (286%)

When councillors hear submissions on this consultation document, do you want to present your views in person ? Yes

Do you require any support to do so ? Yes

YES I WISH TO SPEAK PLEASE Support - may I take a support person with me please ?

Contact Details

Diana Pears

1301 Winton Wreys Bush Highway Winton 9783

back2health@xtra.co.nz

03 2360686

Diana Pears 1st May 2024

Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
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- Representation Review



Please use additional paper if required.

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Yes



No

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Contact details

Name: Diana Pears

Organisation (if representing): _____

Organisation role: _____

Postal address: 1301 Winton Wreys Bush Highway Postcode: 9783

Email: back2health@xtia.co.nz Phone: 03 2360686

Signature: Diana Pears

We can receive your feedback in a number of ways:



Mail

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Environment Southland
Private Bag 90116
Invercargill 9840



Delivery

Environment Southland
Cnr North Rd & Price St
Invercargill



Online

www.es.govt.nz



Email

consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally





1 May 2024

Dear Nicol

Invercargill City Council submission to the Environment Southland Long-term Plan.

Thank you for the opportunity to submit on the Environment Southland Long-term Plan.

We commend Environment Southland for prioritising and budgeting for Flood Protection Planning. This, as you know, is a high priority for Invercargill City Council in order to provide us with the information needed for asset risk assessments, to support infrastructure investment decision making and climate change response planning. We recognise the importance of a catchment planning approach and look forward to hearing more about innovative solutions to manage and mitigate flooding across the catchment. Within this, we request you prioritise investment needed better to understand the flood risks faced by the city, which is the largest population centre in the region, location for many large employers and site of key assets of regional significance including the Invercargill Airport. Involvement of Council officers in planning and reports to Council on progress is appreciated.

There are some projects which are already known to be high priority and capital work should be progressed now. We welcome that the improvements to the Waihōpai Dam are within your plan. We request budget provision is made for the delivery of the remaining Waihōpai Flood Bank project (True Right bank), designed to work with the completed Stead Street Stopbank and ongoing pump station improvements, in an early year of the Long-term Plan. The outcomes of the first two elements of this project will not be fully realised until the third part of the project is completed in order to stop coastal inflow in a flood event up the river and behind the completed Stead Street Stopbank. We look forward to regular updates on progress on these projects.

Where further data and planning is required Council supports a focus on this but requests that Environment Southland does not rate in advance of capital works.

We are all in a high cost environment and know Environment Southland will have been, as we have, undertaking an efficiencies process to identify cost saving measures. Any information which can be shared on this and on the proposed change to South Port ownership and dividend would be welcomed.

Council supports a simplified rating system and recognises the significant work which has gone into the proposed revisions to the Revenue and Financing Policy. However, we request that the Regional Council consider whether the outcomes of this simplification have resulted in a perverse outcome where the costs of delivering the work of Environment Southland are now overly weighted away from Rural Industry towards other types of ratepayers, including residential. We ask you further consider the impact on residential ratepayers who, through direct rates to Environment Southland and indirect (through paying their portion of the increased ICC rates bill from ES) will experience an average 32.64% rates increase to enable

ES activities. We ask that you consider options such as differentials to address the equity of impact on ratepayer categories of the shift from land to capital value.

In addition, we request you consider a three year graduated shift from land to capital value of one third, two thirds and full shift. This will enable a graduated response for ratepayers to plan for a response to this change.

In addition to the issues outlined above, we request, as was done in our 2021 submission, to end the Clean Air Loans Scheme, due to the availability of commercial loans. Council administers this system on behalf of Environment Southland which is creating overheads with no clear outcome benefits.

Thank you for considering our submission. We would like to be heard on this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nobby Clark', with a stylized, flowing script.

Nobby Clark
Mayor

Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

Do you support our preferred option
or do you have another view?

Investing in flood protection infrastructure

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☐

Preferred option

☒

Another option/view



10:28
over
counter
myD

Do you have any further feedback?

attached.



Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
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attached.

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Yes



No

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Contact details

Name: Fiona McCabe and Gavin McCabe

Organisation (if representing): _____

Organisation role: _____

Postal address: RD 5, Invercargill Postcode: 9875

Email: fiona.mccabe@extra.co.nz Phone: 027 76 77 99 3

Signature: Fiona Gavin

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Mail

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Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally

- This whole LTP consultation process seems to have been rushed, poorly organised and poorly advertised. We found out about this consultation originally via word of mouth. We have since seen a small advertisement in the Southland Express. As a ratepayer of your council we would have at the very least expected a letter informing us of your proposed changes and a copy of the consultation document. After all you get the rate notices to us and a glossy magazine appears in our mailboxes. Shouldn't your LTP consultation be of the same importance?
- We do not support the investing in new Flood Protection Infrastructure as proposed in your current LTP. We do not agree with the all new flood protection infrastructure funded by borrowings and repayments by all rate payers. When people purchase a property risks are a consideration. Due diligence is completed. Land beside rivers are always of a lesser value due to the flood risk. This is a risk taken when choosing where to purchase your property near or beside a river. Gravel and silt should be being removed from rivers. At the rate we are going riverbeds are going to be higher than the towns soon. Slash and logs are a major contributor to flooding. What is being done about this? We do not wish to be paying for greed by property developers and bad decisions by council to allow for housing and subdivisions on what is known flood land. Eg very recent subdivision allowed at end of Renfrew Street, Invercargill. There seems to be no accountability of poor decisions and borrowing are considered as easy money. Live within our means and maintain what we do have to a good standard
- We do not support the increase in debt – 286% and the over 100% increase in rates over years.
This would be a bare minimum increase as your budgets seldom are correct. Eg Stead St 750,000 now at 9,000,000
- We do not support your reliance on Government funding in your LTP. Anything can happen with a change in Government or a change in Government budget.
- There is little consideration of affordability in the LTP. People are under a lot of financial stress currently with cost of living increases, insurance increase, interest increase, fuel, other commodities but to name a few. No mention is there in the LTP about what the capital repayments are likely to be. A pensioner relying on the pension as their income stream or a low income home owner will potentially be rated out of home ownership. What is considered to be not a significant increase by you may be very significant to someone else. Significant is a matter of opinion.
- Our children and grandchildren will inherit large debt and debt repayments. Will home ownership even be an affordable option for them?
- The first 3 years of your plan are all modelling. Surely you should know what is required seeing as you have set a plan for 10 years? There appears to be a lack of solid evidence of where and what needs to be done if anything.
- Why not change your LTP to a maintenance plan of all floodbanks and river banks. An expectation that all banks to be at maintained and kept at a level 3 and use some reserves to

achieve this? After all the reserves are overbudgeted projects by you the ratepayers have all ready paid for.

- Whilst not completely against a capital based rate I think a bit more thought needs to go into its implementation. A one box fits all approach does not work.
Why should a farmer for example that has done the right thing and perhaps built a wintering barn then be rated on that?
I think a capital rate will act as a deterrent to people from wanting to improve their properties. More improvements more rates.
A forestry block has very little capital value therefore low rates yet is one of the biggest contributors to issues in a flood with their slash.
A greater capital value does not necessarily mean a greater affordability / cashflow.
- The main factor from the Hawkes Bay enquiry has been the poor response by Civil Defence. How would our Civil Defence stack up currently? We feel that should also be a priority in the LTP together with maintenance as mentioned above.
- The proposed LTP may be what you consider to be best for Southland but it is not an affordable one for our small population.

Other Feedback.

- I do not agree with the one flood protection infrastructure rate based on capital value to replace catchments. A lot of the flood banks are now because of the allowance by council to intensify farming. Where the water used to be able to pond into has now been banked off so the land can be farmed more intensively with no consideration given to where the water can go. If these ponding areas had been left as is there would be no need to have the extra infrastructure at the towns. When people purchase a property they would be expected to do due diligence. Land beside rivers are always of a lesser value due to the flood risk. This is a risk taken when choosing where to purchase your property.
- The current model we use is a successful model and we feel a user pays model. We do not agree with your statement that everyone benefits from floodbanks.
- Quote from the late Eve Poole which I think should be adhered to. "It is not possible for a local body to organise itself to protect its area, its citizens and its industries from major disasters, whether flood, conflagration, earthquake, tidal wave or nuclear attack. Its rate payers would protest vigorously against the cost of such required forces and organisations. The most that can be expected of local bodies is that they have a nucleus of trained Civil Defence personnel, around which communication, transport(both road and air) and assistance from Army and Police may be concentrated and organised.

Martin Sliva 13/5/2024

Tell us what you think

HAVE
YOUR SAY

By 5.00pm,
6 May 2024

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or do you have another view?

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Type text here

☐

Preferred option

☒

Another option/view

Do you have any further feedback?

Use reserves to do urgent work and find other ways to fund flood protection.

I do not want to see such a big debt increase!

Martin Sliva 13/5/2024
Other feedback

Do you have feedback on the other matters raised or anything else?

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Even though the plan is lofty, the forecasted debt is horrific!

What about Tiered Rate System: A system with multiple tiers based on property value?

Please use additional paper if required.

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☒

Yes

☐

No

Please note: Upon request, we are legally required to make all written or electronic submissions available to the public, including the name and address of submitters, subject to the provisions of the Local Government Official Information and Meetings Act 1987. If you consider there are compelling reasons why your contact details and/or submission should be kept confidential, please contact the Council at the address below to make your request known.

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Online
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Email
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Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally

183

Submission on behalf of Thriving Southland Association Incorporated

When farmers and the community get together to discuss local issues and opportunities, great things can happen.

Thriving Southland is a community-led group with a vision to create a prosperous Southland, healthy people, healthy environment from the mountains to the sea.

By working together, Thriving Southland's Community Catchment Groups will help create a better future for all by protecting Southland's prosperity, heritage, environment, and health. Over the last 6 years, since its formation, Thriving Southland has shown both, community buy in, and the capability to support the work of the rural community to understand and effect change.

Since 2020, the number of community catchment groups in Southland has grown from 18 to 37, covering 90% of the region's productive primary sector land. Thriving Southland has a built a strong track record of delivery and supporting groups, with over 80 projects to date, which is testament to the success of the model. Thriving Southland has a strong focus on running a low overhead model within excess of 70% of funds hitting the ground. A key component of this success has been collaboration with stakeholders: Environment Southland, Iwi, DairyNZ, Beef and Lamb, Banks, Rural Professionals.

Thriving Southland would like Environment Southland to look at areas within its Long-term plan and consider opportunities to support the continuation of this ongoing work.

The key areas we would like to draw attention to include.

- Healthy Environment
- Safe and Resilient Communities
- Thriving Region

Healthy Environment:

The Long-term plan has a strong focus on policy, compliance and monitoring which falls under the Councils remit. To achieve positive environmental outcomes for our communities there needs to be targeted support towards action on the ground.

This is an area that Southland community catchment groups are focused on. Ensuring support for this work into the future reduces the Council's compliance and regulatory burden as communities engage in driving change, especially in freshwater, regional economic resilience, biodiversity and climate.

The support of Thriving Southland for the groups has been key to removing the burden from individuals and groups to allow them to build community projects that give the confidence to invest and progress.

Extension Facilitation and community engagement

Support of Thriving Southland's catchment group support, extension and facilitation for Southland's Community Catchment Groups will ensure ongoing community engagement in working towards our regional environmental values.

Thriving Southland's team of Catchment Coordinators are well respected, coming from the communities they serve and with a strong ethos of delivery. This allows a strong two-way exchange of ideas and challenges without the concern of regulation.

We are about "the tools not the rules". The work of Thriving Southland has a long-term vision, continuing to build on community projects and understanding around catchment and local environmental challenges. It is a process that creates exponential outcomes as the work and understanding of catchment groups is well supported to continue.

- Thriving Southland is a key organisation in providing farmers with key messaging and tools, enhancing knowledge, to enable them to develop fit for purpose integrated farm plans that have meaning and value.

Regional Forum recommendations.

Wetland Pilots

The establishment of a Wetland Taskforce to develop a regional programme of wetland development was a key recommendation of the Regional Forum.

Thriving Southland can bring an independent approach, by working with all the parties, to foster an outcomes-based model with strong community ownership and linking community catchment groups, landholders Iwi and key stakeholders.

We are also aware of many of the challenges in developing a comprehensive plan that would progress in work on the ground, with a strong focus on maximizing environmental outcomes from the considerable regional investment that will be required. Thriving Southland will bring a balanced pragmatic approach to work on the ground.

- There is the opportunity to fund Thriving Southland to develop pilot wetland projects working with community catchment groups to develop exemplars that are pragmatic and deliver targeted high value catchment mitigation.

We ask that Environment Southland consider investigating funding mechanisms to support action on the ground including wetland development and potentially other catchment scale interventions to improve environmental outcomes.

Safe and Resilient Communities:

Thriving Southland has a ground up approach to working with communities delivering outcomes that align with community aspirations. We run a trust model encouraging engagement from the rural community knowing they are being listened to.

Southland's community catchment groups have become a safe space for our rural communities to engage with each other and outside stakeholders. The positive direction and self-determination of the groups allows them to work through the many challenges and changes that are a constant in the primary sector. This ensures that we are having good conversations and a holistic approach to the outcomes our community desires. In turn, this allows for a positive approach to change and helps people find direction and support which leads to better mental health outcomes and builds community resilience.

- Programs that deliver farm and catchment specific targeted mitigations with due consideration of financial resilience allowing farmers to engage in positive change.
- Thriving Southland is open to working on joint funding bids that allow for ground up projects (Such as Beyond regulation) aligned with regional outcomes.

Funding sought:

The community catchment groups are leading the way with real momentum, the result of this is action on the ground – community driven projects that are achieving environmental improvement. To help ensure the work of Southland Community Catchment Groups continues and to build action on the ground, we seek financial support from Environment Southland:

- \$235,000 for Seed funding of key projects, including wetland development and targeted landscape and farm system mitigations.
- \$215,000 for Extension and Facilitation towards enabling continued on-the-ground action.

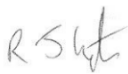
The funding sought is less than 30 percent of Thriving Southlands annual budget, however funding from Environment Southland would show external funders tangible support from our regional council. The intention is to leverage off this funding (plus significant in-kind funding from community catchment groups) to apply for other funding opportunities. Thriving Southland is open to working with Environment Southland on further joint funding bids going forward.

In conclusion, Thriving Southland stands ready to collaborate with Environment Southland and other stakeholders to realise our shared vision of a prosperous, healthy Southland. By investing in community-led initiatives and fostering meaningful engagement, we can secure a brighter future for generations to come.

For more information on the work of Community Catchment Groups [Click here](#)

Thank you for considering our submission.

Sincerely,



Richard Kyte

Project Lead

Thriving Southland Association Incorporated

Understanding your landscape's resilience: Beyond Regulation

REPORT SUMMARY

Project overview

In collaboration with Land and Water Science Ltd (LWS) and Thriving Southland, the Understanding your landscape's resilience: Beyond Regulation project was launched to address the critical need for sustainable land management practices in the Mataura catchment. Funded by the Agmardt Food and Fibres Aotearoa New Zealand Challenge, this innovative project aimed to identify targeted mitigations to reduce environmental impacts while aligning with farmers' goals and supporting financial resilience.

Holistic approach

The project adopted a holistic approach, leveraging advanced scientific landscape data and comprehensive farm system analysis to develop effective mitigation pathways for soil, greenhouse gas and water quality emissions. Through high-resolution physiographic mapping and farm system assessments, valuable insights were provided at both catchment and farm scales, empowering land users to meet their environmental responsibilities effectively.

KEY INSIGHTS FROM CASE STUDIES:

- » **Case Study 1:** A dairy farm near Brydone demonstrated the efficacy of bundling low-cost farm system mitigations with landscape interventions to reduce contaminants effectively.
- » **Case Study 2:** A sheep and cattle farm near Wendonside highlighted the significance of aligning hydrology and landscape susceptibility insights to guide investments in minimising losses.
- » **Case Study 3:** An arable farm near Balfour emphasised the importance of targeting nutrient applications and treating contaminants leaving the farm boundary to reduce environmental impact effectively.





Extension programme

A robust extension programme, including interactive field days, digital resources, stakeholder meetings, and targeted conference presentations, ensured the widespread dissemination of project findings to the broader community. Ongoing engagement with Catchment Groups and individual farmers remains a cornerstone of the project's strategy, facilitating the continuous exchange of insights and supporting the widespread adoption of sustainable practices.

Future recommendations

Looking ahead, further collaboration and dissemination of findings will be paramount in driving positive change and enhancing the overall environmental health of the catchment. Recommendations include addressing existing gaps in forestry integration, wetland implementation, lower intensity land use change, and policy support. The project aims to expand its reach through comprehensive training programmes and the development of accessible resources, ensuring the widespread adoption of sustainable practices not only within the Maitara catchment but further afield.

For more information and to read the full report, visit
www.thrivingouthland.co.nz/beyond-regulation-maitara-catchment-project



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ENVIRONMENT SOUTHLAND SUBMISSION 29-4-24

UPDATED

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The following represents our thoughts on a range of factors that need to be considered as part of the programme to improve the flood protection schemes in the Eastern Southland catchment.

- [1] The Gore stop banks must be raised significantly to protect the town from future flooding. The February 2020 flooding event was a harbinger of similar events in the future. The effects from climate change mean that this is a when, not if, eventuality.
- [2] The Gore stop banks must be immediately surveyed to ensure that all pipes through them, consented or otherwise, have been sufficiently bolstered. These pipes stand to cause breaches in the stop banks in times of severe flooding.
- [3] River bed dredging, river bank tree removal, river bed flow way width and bridge pile and abutment inspections need to be an ongoing priority. Town safety and home protection need to be placed above aesthetics. **Earlier this year, some trees that were planted in the stop bank along River St traffic bypass were removed, but nothing else. WHY? Riverbed dredging was said to be begun early 2021. However, this dredging has failed to happen to date. WHY?**
- [4] The bolstering of the Waikaka Stream bank on the true right alongside Hamilton Park needs to be a priority to stop further erosion of the old dump site that would prevent further pollution of the stream and Maitara River.
- [5] When flood disaster is looming, farmland must be sacrificed before the towns when there are no further remedies to avoid town inundation. The relative insurance compensation costs for farmers compared to a town's inundation make this a no-brainer. Most importantly, farmers whose land is flooded as such a fall back to avoid town flooding, **MUST** be fully compensated and given priority clean up assistance by regional councils and/or the Government.
- We were assured at a previous Gore consultative meeting that the above issues can be comfortably done using some of the government funding offered for Southland's flood protection infrastructure improvements.

[6] However, for Gore, the above improvements alone will not solve the flood risk. The other big problem is that caused by the existing heights of the State Highway 1 road bridge and the main trunk railway bridge which both cross the Mataura River in Gore. The railway bridge was barely above the flood torrent in the Feb 2020 flood and was in danger of acting as a dam and/or being swept away and causing catastrophic flooding in Gore because of consequential stop bank failure. Also, during this flooding event, the road bridge was noticeably vibrating and could have failed if the flood water was any higher, thus leading to similar Gore township flooding.

These two bridges are the primary links to Gore from the north. Gore is the main hub for the agricultural industry for most of Southland. Southland is a major primary export producer which has continued to perform even through the covid-19 pandemic. The main road links to Invercargill and the South coast, Fiordland, Central Otago as well as the corridors to Dunedin radiate from Gore. It is essential that the two bridges both remain open as well as not providing a risk to Gore in times of flooding.

Thus, if the stop banks are to be raised, the two bridges must also be raised accordingly. The only way this can be happen is if the two bridges are replaced. **Has the Government been approached about this and, if so, when?**

This would mean the piles will have to be deeper and stronger and the approaches will also have to be raised. There will have to be consequential redesign of the area immediately south of the highway bridge where roading levels and Gore businesses will be affected. Similar raising of the railway approaches will also be needed. This is a major and costly change which needs to happen and receive priority funding. This project is not in the current tranche of money from the Government which is earmarked for natural disaster alleviation. The funding for the road bridge project will have to come from NZTA and the rail bridge from the national railways budget. For the work on these bridges to happen as soon as possible and fit in with the stop bank improvements, Environment Southland must immediately make, and continue to make, representation to Government to get the approval for the funding and construction of the bridges in the next budget round. The whole project easily fits in with the notion of "shovel ready" projects and also fits in with the need to find work for workers who would be adversely affected by the possible Tiwai Pt Smelter closure or other Government cutbacks that would make suitable workers available.

[7] Another point for consideration is the digging of another channel for the Mataura River to pass through the East Gore area around Churchill St. It would meet up with the existing river near the oxidation ponds. It would mean a handful of houses would have to be demolished and the residents relocated. My thoughts would be to rehouse them in the new Matai Ridge subdivision at no extra cost to them [The cost would partly come from the acquisition funds from the sale of their existing houses.] The channel would be concrete lined so there would be no risk of water contamination from the refuse sites. It would mean that a bridge for road traffic and another for rail traffic would have to be built to cross this new channel. However, the remodelling of the existing bridges over the river would probably not be necessary as the river flow would be spread between the two channels.

In conclusion, from above, Parts 1, 2, 3, 4 5 need to happen. Also, one of Parts 6 and 7 need to happen.

The Government must also come up with the equally urgent **replacement** Gore road and bridge funding to complement the funding for the flood protection improvements. Both elements are essential for this important primary production area. Gore must never be threatened or cut off as it was in the Feb 2020 event.

Jenny & Terry McNamara

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13 May 2024

Draft submission on Environment Southland Long Term Plan 2024-2034

Thank you for the opportunity to input into the Environment Southland (ES) Long Term Plan (LKTP) submission process. I am a Southlander with a keen interest in the Southland Environment. I have 35+ years experience as a professional botanist/ecologist working predominantly in Southland. I am actively involved in several site restoration projects and have also provided advise to many other projects.

The LTP is an important document setting assisting to set budgets and work priorities over the next several years. I was disappointed with the ES discussion document that was released, this has a narrow focus on river catchment works. River catchment is only one of many important issues that ES needs to address and focus on in future years. Some of the key environmental issues facing Southland and which ES need to be actively involved with, from my perspective, include climate change impacts, deteriorating health of water bodies and declining health of many indigenous ecosystems and species. In this submission I discuss several issues that are important to me, which I believe that ES needs to budget for in its LTP. I highlight actions that I would like ES to undertake during the 2024-34 LTP year period.

Flood protection

I am pleased to read in the LTP discussion document the comment - "It is not viable to keep building higher and higher stop banks. One alternative is nature-based initiatives such as wetlands for water retention, native plantings and restoring old channels. This is something that we have already started to explore." I strongly endorse these comments, but want to see funding allocated to nature-based initiatives. I especially endorse the comment "It is not viable to keep building higher and higher stop banks". Also simply removing more and more gravel will not solve the flooding problem.

Southland has important flood plain ecosystems that remain. These include podocarp forest remnants and wetlands, which are rare, having been much reduced locally and regionally. These ecosystems provide habitat for many native species including threatened native plants and animals. These the ecological functioning of these ecosystems are impacted by flood protection infrastructure. Our Southland rivers include braided and semi braided riverbeds which are important for river birds (esp. Black billed gulls, black fronted terns and banded dotterel). Southland is either a national or regional stronghold for these species.

What I would like from the LTP

- I encourage ES to take a more holistic approach to riverbed management. Providing space for rivers and better management of our native flood plain forest and wetlands should be incorporated into river management and infrastructure planning, policy and funding.
- Increased consideration of the impact of flood protection infrastructure on indigenous ecosystems and species. Where the impact can not be avoided, it should be minimised, remedied and mitigated.

Policy and Planning

I make a strong plea to ES to implement its Southland Land & Water Plan (SLWP). This plan has been through extensive consultation and lengthy Environment Court hearings to get it to the stage where it has now been approved by council. It is now time for ES to implement the plan through adequately funding through the LTP.

Southlanders including me are concerned with the state of our waterways (including our local New River Estuary). Intensification of land use (including dairying) is the primary cause of poor water quality. It is important that there are environmental bottom lines established including catchment nutrient limits, improved winter grazing standards, stricter limits to stock access to water ways, a requirement for farm plans and other initiatives implemented through the SLWP.

There are other important regional planning issues including the Climate Change impacts. Climate Change will be the most significant environmental issue facing our region in the coming decades. Other regional environmental planning initiatives need to continue to be supported.

What I would like from the LTP

- To undertake/continue implementation of the approved ES SLWP and to ensure adequate funding for the implementation.
- Continued support and regional leadership on planning initiatives associated with Climate Change issues.
- To support other regional environmental planning initiatives.

Biodiversity

I am pleased to note ES Chairman Horrell's comments in the LTP consultation document – "Our biodiversity programme which aims to protect Southland's native species and ecosystems, will continue to provide advice, support and grants to landowners and the community."

ES has increased its role in Biodiversity in Southland and I support a continuing it role with an increase in Biodiversity expenditure. Recent ES Biodiversity initiatives include having established a Biodiversity team, also employing Wildlands to undertake ecological assessment surveys, increased funding to the ES Environment Enhancement Fund (EEF) and a range of other projects. This increased funding is resulting in biodiversity gains. The expanded EEF in particular has contributed to the success of many biodiversity initiatives. It is important that the increased biodiversity funding continues to enable landowner and community groups to maintain and increase the gains that have been made.

Southland is a Biodiversity hotspot in New Zealand, supporting a rich diversity of species and ecosystems, including many rare species and ecosystems. Some of these species and ecosystem are endemic to Southland. Southland is a New Zealand stronghold for wetlands both in terms of extent and diversity of wetlands. Southland is nationally important for peatland and estuary wetland

preservation in terms of extent and condition. Wetlands are important for many environmental services including Carbon sequestration, maintaining water quality and quantity, and flood mitigation. Unfortunately, the recent publications indicate the continuing loss of wetlands in Southland.

Predators are a major threat to our endemic birdlife. Southland supports some of the rarest birds in New Zealand, with the southern New Zealand dotterel being the rarest bird in New Zealand with only 101 remaining and the decline continuing at a fast rate. Southland is also the major home of kakapo, takahe and other species. Support for predator control initiative is important for maintaining our native fauna. Predator Free Rakiura would have major benefits for the southern New Zealand dotterel and other species and would have economic returns through tourism. Other mainland Predator Free Initiatives would also have a wide range of benefits.

There are still major biodiversity information gaps and major pressures facing biodiversity (both species and ecosystems) in Southland. Unfortunately, basic inventory information on the biodiversity of Southland is still lacking and there is very little accurate or monitoring based information on the condition or trend information for species and ecosystems in Southland available.

What I would like from the LTP

- The ES Biodiversity team to be maintained at its current or ideally an increased staffing level.
- The Environment Enhancement Fund to be maintained at its current or ideally an increased funding level. (This will provide increased ES funding support for landowners, community conservation and catchment groups.)
- Increased improved biodiversity information, including:
 - Undertake a regional biodiversity inventory,
 - Undertaking state of the environment monitoring on ecosystems and for key species,
 - providing information on locally rare ecosystems to landowners,
 - producing regional lists of species for the major taxonomic groups (i.e. birds, lizards, fish and plants),
 - producing regional threat status lists for the major taxonomic groups.
- Increased support to the QEII Trust. (Note: QEII Trust works with landowners to voluntarily protect and enhance biodiversity on private land. However adequate funding is not available to meet demand).
- ES to lead by example in the biodiversity field by
 - Partnering with others in a series of regionally important biodiversity management and enhancement projects within Southland.
 - Undertaking an expanded biodiversity enhancement project on its lower Maitai land holdings (including linking the riverside shrubland areas with the nearby forest remnants and linking the larger northern forest remnants).

Other Biodiversity initiatives that I request ES to support are:

- ES to work more closely with other Environmental and Biodiversity agencies and groups within Southland.
- ES to review and expand the scope the Regional Biodiversity Group.
- ES funding and support for Predator Free initiatives including Predator Free Rakiura/Stewart Island and Predator Free Bluff to Otago area.

Biosecurity

Existing animal and weeds pests and future biosecurity incursions all impact (or will) upon our region's special biodiversity and land productivity/economy. Climate change will increase the range

of biosecurity threats both will new arrivals into the country and with movement of pests. There is also an increasing knowledge of the increasing numbers and effects of some pests (e.g. Upper Makarewa Catchment Group reporting on feral animals).

The Regional Pest Management Strategy (RPMS) is an important tool in prioritising pest management in Southland. It will be due for renewal during the term of the current LTP. It is important that the RPMS gives an equal weighting to both biodiversity/environmental pests and agricultural/primary sector pests.

What I would like from the LTP

- Continued support for ES Biosecurity funding for existing weed and pest control (including marine pests) work programmes.
- ES to have a proactive involvement in future biosecurity incursions especially those that impact upon biodiversity and land productivity/economy.
- ES to produce its next Regional Pest Management Plan within the term of the current LTP. (We also suggest that the next RPMS gives an increased focus to biodiversity/environmental pests.)

Land use change

Land use change can be difficult to predict and so to proactively regulate any adverse effects. Forestry is a land use that is currently expanding. While exotic forestry has many benefits there are also a range of adverse effects. Conversion to exotic forestry can directly impact upon existing indigenous biodiversity, particularly shrubland and tussockland loss. There are also likely to be indirect effects such as on wetlands (through reduced water flows). There are probably also unforeseen effects, cumulative effects, social and other impacts. There needs to be adequate and appropriate buffers from watercourses, forest, wetlands and other indigenous vegetation. What will be the next new major expansion in land use in Southland. What will be the effects of this land use? Will there be adequate controls in a timely manner to minimise any adverse impacts.

What I would like from the LTP

- To ensure that ES is proactive in planning for major changes in land use and implements methods to reduce any adverse impacts (including biodiversity and social).

Yes, I would like to speak to my submission.

Brian Rance

Email Consultation@es.govt.nz

Name:- Jenny Campbell

Organisation:- Connected to Coal Action Murihiku (CAM) & Secretary of Southland Forest & Bird. (Sec SF&B)

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Email :- jennycam@xtra.co.nz

Phone 027 351 0180

Signature:-JA Campbell

I do wish to speak to my submission

He iti, he pounamu. It may be small but it is very precious.

To Whom it May Concern

I as a member of CAM & Sec SF&B, accept the kaupapa of National F&B & agree with the imperative for ES to see the value of these principles in guiding their work as well, for the good of Te Taiao and in light of every living being totally dependent on our earthly home.

The Royal Forest & Bird Protection Society Inc. of New Zealand (Forest & Bird- F&B) is Aotearoa New Zealand's leading independent conservation organisation.

1. Forest & Bird has played an important role in protecting and preserving New Zealand's environment and native species for a century.

Forest & Bird is independently funded by private subscription, donations, and bequests.

2. Forest & Bird has for many years had a strong interest and involvement in protecting and restoring nature on land, in freshwater and in the ocean, throughout the country including in Invercargill and Southland. Our Forest & Bird strategic objectives are as follows:

- **Climate Centred:** Ensuring our country does everything we can to keep the climate safe for all life on Earth. The impact of climate change will be at the centre of everything we do.

- **Economy that Supports Nature:** A Community that recognises that the long-term economy is dependent on a healthy environment for nature's intrinsic and life giving values.

- **Vibrant Landscapes:** Stable, healthy ecosystems full of native animals and plants.

- **Energised Water, Rivers and Wetlands:** Rivers, streams and freshwater that run clean, healthy and are teeming with life.

- **Oceans Alive:** Protected and preserved marine life and ecosystems.

3. Forest & Bird have an active volunteer branch in Southland, part of a network of 45 volunteer led Branches nationally, whose multigenerational members and supporters play an important and active role in protecting and restoring the region's native species and habitats in their respective districts. Within Forest & Bird there is a wealth of knowledge and expertise on protecting and restoring Aotearoa New Zealand's native ecosystems and species. Forest & Bird also have regional Kiwi Conservation Clubs for tamariki, and Youth branches for rangatahi across the country.

General Comments- including aspects of the national F&B's kaupapa.

- I agree with your efforts to date **about reducing carbon emissions** but we are in a Climate Crisis so more needs to be done & faster in reducing emissions eg the Prison has not implemented its responsibility to get off coal boilers when it was granted money from EECA to implement that. It has a responsibility to its staff, inmates and the people in the new industrial area close to its premises to carry this work out asap. This Government needs to act here & ES can push for that. ES needs to incentivise businesses with coal , diesel & gas boilers & machines to get out of these fuels asap! It's for the good of our ratepayers' health (and takes pressure off our hospital with reducing asthma & lung diseases). I request that you have another time of offering interest free loans to encourage more people to get out of fossil fuels use as ES did so successfully in South City a few years

ago. Reducing carbon emissions by 10% by 2027 would be a great aim & remind us how urgent this action is!

- Installing rain gardens & **encouraging more wetlands** around the Province & not draining present wetlands are a must! It saves on expensive road works & installation of bigger costly pipes! I recommend all the Councils work on this together under ES's wisdom & knowledge / science.
- I agree with Forest & Birds kaupapa of us being a '**Voice for nature**' We cannot continue to abuse our environment & expect to be a healthy & thriving Province. I quote from their principles, listed below **in the next 4 points made**, which all apply here in Murihiku.
- **Nature Based Solutions (NBS)** are approaches that utilise the inherent power of nature to address various environmental challenges while providing co-benefits to human societies. As the world faces complex environmental problems such as climate change, biodiversity loss, and natural resource depletion, nature-based solutions offer a promising avenue for sustainable and holistic solutions.
- NBS play a crucial role in **mitigating climate change** by absorbing and storing carbon dioxide. Forests, wetlands, and other natural ecosystems act as carbon sinks, sequestering large amounts of carbon and reducing greenhouse gas emissions. Restoring and conserving indigenous forests, implementing indigenous afforestation and reforestation projects, and protecting coastal ecosystems like estuaries all contribute to carbon sequestration, helping to stabilise the climate.
- NBS support the **preservation and restoration of biodiversity**. Healthy ecosystems provide habitats for a wide range of species, ensuring their survival and promoting genetic diversity. Preserving biodiversity is crucial for the functioning of ecosystems, as it contributes to pollination, seed dispersal, and nutrient cycling. By conserving and restoring natural habitats, NBS help safeguard numerous plant and animal species, protecting the delicate interdependence of ecosystems.
- NBS in urbanised/township areas **improve resilience and liveability** by creating green spaces, enhancing air quality and mitigating urban noise. Urban forests, parks, green roofs, and vertical gardens enhance biodiversity, absorb pollutants, and provide cooling/shading effects, making rural communities, towns & cities more sustainable and

enjoyable for residents. NBS also contribute to mental and physical well-being, offering recreational spaces and connecting people with nature.

- **Room for Rivers;- ES** must invest in prioritising ‘making room for rivers’ as the preferred approach for river management and flood protection. Making Room for Rivers is a long-term, evidence-based, cost-effective approach to living with rivers and flooding, which recognises that rivers move and adjust over time and need more space to flood safely. Making room for rivers keeps communities safer, costs less, and is better for our wildlife than hard engineering approaches – and accounts for future climate change impacts.
- I ask that council incorporate Making Room for Rivers in its long-term/30-year infrastructure plan but this should be supported by initiatives in the 10 year LTP. Forest & Bird has presented to most regional and local councils about the benefits of making room for rivers, and I affirm your continuing work using this kaupapa & now urge you to invest more in programs to support this kaupapa.
- I note that the ES LTP discussion document focuses on flood bank protection and enhancement works. There is a push from some rural landowners to be undertaking a lot of gravel extraction from riverbeds. I recommend a more holistic approach to riverbed management, using the above kaupapa of ‘Making room for Rivers’ as a strong preference for this work, going forward. Southland’s braided and semi braided riverbeds are very significant for birds, especially for those which use these as prime habitat. They are particularly important for river birds including black billed gulls, black fronted terns and banded dotterel. There is an Otago University study being done on the Aparima River below the Wrey’s Bush bridge which is especially relevant regarding this need.
- In particular there needs to be careful extraction of excess gravel to replenish coastal margins already eroded , or at risk of erosion. This would be a positive response to the crisis already apparent in many areas, including at Bluecliffs. Restoring original courses , and in the case of **the lower Waiau the river mouth and bar barrier** , is a recognition that the river has paid a terrible price for the decision fifty years ago. Taking the huge flow and redirecting it through West Arm Power station to provide electricity for the Smelter has been a disaster for the Waiau River and its wildlife & adjacent coastal environment.

Restoring the original main stem, lowering the raised bed and redirecting the present flow away from Bluecliffs would be a better use of the \$7million at presently earmarked for the creation of an alternative route for flows to prevent algal blooms in summer. The present flow regime, going from 550 cumecs average historically to between 14 and 16 cumecs with some additional flows, does not provide clean green, sustainable energy! The ratepayers of the District Council and Environment Southland should not have to pay to redress the impacts of this historic decision. Meridian and its major shareholder the Government need to finance the restoration of this once magnificent river.

Carbon reduction

- I encourage ES to adopt a 'zero carbon' strategy with an ambitious timeframe which is resourced and funded. This should be included in the LTP. The strategy needs to address emissions through transport, waste, energy and local economy, particularly in agriculture. I strongly encourage ES to adopt a process and strategy for ensuring the processes of carbon reduction are a priority, related to our Aotearoa's commitment to the Paris Agreement. .
- **WATER Quality & Quantity:-**
- I concur with Forest & Bird's outline of their kaupapa as outlined in the following 4 paragraphs, particularly related to the benefits of wetlands.
- Every Wetland Counts & ES Council's intention to fund investment in wetland restoration projects, is to be commended particularly on council-owned land such as regional parks and urban areas. Forest & Bird has mapped areas of lost wetland on public land that could readily be restored, and this data is publicly available on the Koordinates website. I ask council to invest in analysis of the feasibility of restoring these areas where such local work hasn't already been undertaken.
- ES Council should continue to **fund wetland mapping**, monitoring, and protection programs. Councils are required to map and monitor wetlands under the NPS for Freshwater Management. While national policy could be subject to change with the new government, this should not mean you reduce any resourcing for wetland mapping, monitoring, and protection. Wetlands are critical ecosystems and are

under significant threat, with urgent action required to reverse the downward trend in their prevalence. Restoring wetlands should be a priority for your ES Council to improve wildlife outcomes, improve community amenities, store carbon, and increase resilience to extreme weather. Ensuring they are mapped and monitored is a vital first step.

- Councils must fund compliance monitoring and enforcement for compliance with the **National Environmental Standards**, particularly with regard to wetland clearance and drainage. As noted above, wetlands are under severe threat, with Council having responsibilities under legislation to protect them, as well as to the public to ensure the downward trend in wetland extent is reversed. This means monitoring needs to be supported by compliance and enforcement.
- Council should also support native planting and wetland restoration programs through investment in their own (or community – such as Forest & Bird) nurseries. Many councils have targets for wetland restoration and these can be accelerated by supporting the availability of native plants for restoration projects to be used on public and private land.
- I commend local Catchment groups Under Thriving Southland which have made the restoration of wetlands alongside creating new wetlands, as a priority when deciding on projects for their group. The *'Between the Domes'* group is particularly involved in this work.

National Policy Statement on Indigenous Biodiversity (NPS-IB)

- I agree with Forest & Bird's encouragement for ES Council to invest in identification of Significant Natural Areas (SNA's) within their region. Despite the current government indicating they wish to pause this requirement, identification of SNA's is still a legal requirement of the NPS-IB which must be completed by 2028. Their point of view which I agree with, is outlined in the next 5 points made.
- Forest & Bird sees the LTP process as an opportunity for the council to indicate the extra resources required to identify SNA's within its boundaries, using the identification criteria set out in NPS-IB. They suggest continuing the process by assessing Council owned parks,

reserves and other land, then continuing to other public and private property.

- The NPS-IB states that an area of Crown-owned land may automatically qualify as a Significant Natural Area (SNA) without assessment if it is a scientific, scenic or nature reserve under the Reserves Act 1977, a sanctuary area, ecological area, or wildlife management area under the Conservation Act 1987, or an isolated part of a national park (3.8 (8)(c)(iv)). There may be such areas in the district already. It is important to highlight that previously established activities on SNAs which are identified through the above process, must have their adverse effects managed (as in NPS-IB 3.15(2)).
- The NPS-IB (3.16(3)) requires councils to make or change its plans to be consistent with 3.16, managing effects on indigenous biodiversity outside SNAs by applying the effects management hierarchy in the NPS-IB (set out in 1.6). If this is not currently the case with existing council plans, then they suggest resource is allocated in the LTP to account for this need.
- The NPS-IB states that local authorities must include objectives, policies, and methods in their policy statements and plans to promote the restoration of indigenous biodiversity, including through reconstruction of areas (3.21(1)). If this is not currently the case with existing council policy statements and plans, then we suggest resource is allocated in the LTP to account for this need.
- The NPS-IB gives local authorities eight years from commencement of the NPS-IB (4 Aug 23) to publicly notify any changes to their policy statements and plans that are necessary to give effect to the NPS. Therefore, we feel it is appropriate to include these requirements in the LTP, as some may be resource intensive and will require funding.
- **Biodiversity Funding:** I understand ES has already received significant Jobs for Nature funding and under this employed a team of Biodiversity staff. It has also employed Wildlands to undertake ecological assessment surveys and increased funding to the ES Enhancement Fund and some other projects. Fortunately this funding much increased the ES Biodiversity funding. The Enhancement has increased from \$50,000 to \$300,000. I affirm ES for their foresight and forward planning which is essential to maintain and improve our biodiversity across Murihiku. It is imperative that this Biodiversity

funding continues as our native biodiversity is in crisis, not just in Murihiku but also across the rest of Aotearoa.

- Funding support for other Environmental Groups must continue, as they support ES kaupapa & are excellent allies. These include QE11Trust, Thriving Southland & Catchment groups.
- **Pest Eradication & Management**
- Funding for pest eradication alongside management needs funding to continue after a lot of excellent work was done through the Jobs for Nature programme. This is imperative as our native biodiversity is being threatened by a very serious rise in the number of browsing animals ie ungulates, as well as some of these species extending their range in to/ towards our region. Our native forests are threatened by collapse as these species are eating all the seedlings, so preventing revegetation. Possums continue to browse the canopy as well as seedlings. This not only affects forests' abilities to hold soil & prevent slips in the event of severe weather conditions, but we are also relying on healthy, thriving and regenerating native forests to be doing the work of being a huge carbon sink in order that we can use them to meet our climate & carbon sequestration obligations under the Paris Agreement.
- It is essential that upper catchments are protected by native vegetation so this slows down run off & therefore the impact on lower catchments & the risk of bigger floods in vulnerable lower reaches. Removing these feral animals is essential to enable this to happen. Rabbits are another pest which need to be destroyed in a planned manner.
- Providing funding for the removal of exotic wildings is an on- going need eg Mid Dome. They need to be replaced by the natural native biodiversity eg tussocks & forest. Those who farm exotics must continue to be held to account on their responsibility for clearing wildings on adjacent land / properties.

Te Mana o Te Taiao

- It is good to see ES Council, through their LTP, recognising that nature is at the heart of the Aotearoa economy. Restoring nature will also help us to address the current impacts of climate change and be more resilient to future impacts.
- Te Mana o te Taiao includes goals that will make the roles and actions of local government clearer and easier. The council should familiarise themselves with these goals and actions and fund them appropriately.

- Upholding the principles of the Treaty of Waitangi is an essential part of Te Mana o te Taiao. It is good to see ES continuing to work together in partnership towards a shared vision for nature, ensuring that rangatira and kaitiaki obligations, as well as mātauranga Māori, are actively protected.

Social & Cultural Wellbeing

- **Every decision** ES makes for its long term plan should be very mindful of present and **future generations** with young people very vulnerable and worried about the future they are going to have to deal with as they look at the decisions we are currently making. Their mental health is being impacted significantly.
- Investing in natural heritage retention, restoration, rehabilitation and protection can greatly increase social and cultural wellbeing, and a sense of pride in the district and community. Developing and retaining native plant connections/corridors, especially for birds, identifying and enhancing SNA's, pest control, reducing emissions, increasing riparian plantings, climate resilience through nature based solutions and so on, all have links to improvements in both social and cultural wellbeing. We would encourage council to look to these types of projects as not only responses to the dual climate and biodiversity crisis, but as ways to improve both social and cultural wellbeing.

Regional Climate Change Strategy

- ES needs to be being mindful on coastal erosion and coastal processes. Some communities are already very vulnerable and the potential sea level rise is an imperative to be acting on now.
- Choice- 'the allocation of \$200,000 a year for Council to use to implement carbon emission reduction initiatives. However, development and implementation of a 'zero carbon' strategy, like that mentioned in general comments above, would be much more ambitious and advantageous to the Murihiku region.

- I consider this as ential alternative.
- **Adapting to climate change** is much more than emissions reduction. As mentioned above, Nature Based Solutions and Room for Rivers are both methods of achieving climate resilience, as well as increasing biodiversity and community wellbeing. Relying on traditional engineering methods, as proposed (investment in larger stormwater pipes) is expensive, intrusive and outdated. There are many blue/green engineering options to achieve better storm water outcomes, as well as improving storm water quality.
- **Active Transport!** Cycle lanes & trails need to be further developed in conjunction with other Councils in Murihiku with safety paramount and so encouraging more people to use cycling as a means of fitness & improved health. They also reduce carbon emissions and get cars off the roads so reducing congestion and accidents. Walking paths need to be fully maintained for use as well for the above reasons.
- I agree with your Key plans for **Three Waters- Kā Wai e Toru**. Comments from the general F&B kaupapa also apply in this section eg under Water Quality/ Quantity aspects, including the significance of wetlands across this sector
- I support the implementation of the **approved ES Land & Water Plan**. . There has been much consultation on the plan and a huge cost (both financially and in time) to get the plan approved finally. This is an essential piece of work for the benefit of all aspects of ES work & Kaupapa.
- In summary I support these essential plans & services being continued in your LTP:
 1. Continuing ES Regional planning
 2. I support ES Biosecurity funding for weed and pest control including marine pests.
 3. Continuing to support ES funding for community conservation and catchment groups alongside QE11 Trust activities
 4. ES funding for Predator Free initiatives including Predator Free Rakiura/Stewart Island is a must in your budget & must be implemented because of all signs of the destruction by introduced predators..
 5. Supporting climate resilience projects is an imperative for me as I see Murihiku being very vulnerable in this space..

- I am prepared to **pay rate rises for essential services** eg Kā Wai e Toru in order to take the burden off future generations. We learn from our Tipuna and Heritage.

I commend the work of ES Councillors, staff & contractors for all their commitment & mahi, to ensure Murihiku is prepared for the many possible threats to our environment locally, regionally, nationally & internationally.

Whakataukī: Titiro whakamuri, kōkiri whakamua.

Look back & reflect so you can move forward.

Rangimārie.

Ko Oreti tōku awa
Ko Takitimu tōku maunga,
Ko Takitimu tōku waka
Ko Ngaitahu tōku iwi
Ko Te Rau Aroha tōku marae
No Mossburn tōku kainga
Ko Jenny Campbell ahau

He waka eke noa - We are all in this together.

54 - Mr Bertram Hammond

Submission Number: 54

Submission Date: 12/05/24 04:29

Respondent: Mr Bertram Hammond

Email: annejohnhammond@gmail.com

Environment Southland Long-term Plan

Comment Number: 1

Do you support our preferred option or do you have another view?

Do you have any further feedback?

* Yes

Other feedback

I am writing to express my deep concern regarding the potential increase in rates proposed by Environment Southland. As a pensioner, the current cost of living already places significant stress on my financial situation, and any additional burden would exacerbate this hardship.

On a fixed income, every expense requires careful consideration and budgeting. Despite our best efforts to manage costs, the rising prices of essential goods and services continue to strain our resources. The prospect of increased rates is daunting and threaten our ability to meet basic needs.

In light of these difficulties, I kindly request that the council carefully reconsider the proposed rate increase and explore alternative solutions to address budgetary need while minimizing the impact on vulnerable members of the community, such as pensioners.

I would also like to highlight the fact that this is the first we have heard of this proposal by Environment Southland, I am very disappointed in the short notice.

When councillors hear submissions on this consultation document, do you want to present your views in person?

* Yes

Do you require any support to do so?

* Yes

Contact Number

021927365

55 - Dave Riddell

Submission Number: 55

Submission Date: 12/05/24 05:22

Respondent: Dave Riddell**Email:** riddelldc@gmail.com**Environment Southland Long-term Plan****Comment Number:** 1**Do you support our preferred option or do you have another view?****Do you have any further feedback?**

* Yes

Other feedback

I disagree with the proposal to change to one Flood Protection Infrastructure Rate based upon capital value.

While it is argued that the whole community benefits from flood mitigation/protection individual catchments have different risks and different benefits from schemes.

Implementing a single rate across the province is socialistic in that areas of higher risk are subsidised by lower risk areas.

In regard to rural land it is personal choice whether or not to farm in areas impacted by floods and it is appropriate that costs of protection/mitigation are borne by those most impacted.

It also disadvantages properties with high capital value but not necessarily any better means to pay. Loading commercial properties with high rates inevitably trickles down to their customers/consumers.

Do you have feedback on the other matters raised or anything else?

* Shareholding in South Port NZ Ltd

Feedback on other matters

I have mixed views about the sell down of South Port shares. On balance I am opposed as I see the Regional Council as custodians of the shares for the people of Southland. An alternative investment comes with its own risks and costs

Council Operations

Nowhere in the plan have I seen any mention of an attempt by Council to prune its operations. In the 1990's the Council employed circa 50 staff and today the number sits at around 4 times that number. Quite frightening

In the current recession it is time to cut expenditure - not propose to increase it.

When councillors hear submissions on this consultation document, do you want to present your views in person?

* Yes

Do you require any support to do so?

* No

Contact Number

+64274461281

58 - Mrs michelle Fraser

Submission Number: 58

Submission Date: 13/05/24 01:34

Respondent: Mrs michelle Fraser**Email:** gary.fraser@xtra.co.nz

Environment Southland Long-term Plan

Comment Number: 1

Do you support our preferred option or do you have another view?

Do you have any further feedback?

* Yes

Other feedback

Today is the first time this plan has been brought to my attention by a concerned neighbour.

I am in agreement with the plan to create a single new Flood Protection Infrastructure Rate to replace 140 catchment rates.

I am most definitely AGAINST Moving the Biosecurity and Land Sustainability Rates to the General Rate based on the capital value. This rate should have nothing to do with the value of someones house. That is just disgraceful revenue collecting yet again. And yes I am aware that most of your rates are based on Capital value but I disagree with that too, unfortunately I did not get any say in that. LEAVE THIS CHARGE CALCULATED ON LAND VALUE.

I am most definitely AGAINST the Flood protection infrastructure being funded by borrowing with repayments paid for by all ratepayers across the region for reasons stated above.

In the proposed plan it is stated that individual ratepayers will be notified if they will be having a large increase in rates. I believe we will be one of those ratepayers and I have not received any such notification. This is not satisfactory. In addition I am having extreme difficulty in understanding your pie charts and statistics. I would like to know what the exact impact will be financially on my household. An increase anywhere in the vicinity of \$200 per annum for the foreseeable future for Environment Southland Rates is NOT OK in this current economic environment.

It will further increase the cost of living/the cost of housing, including rental accommodation which no one in our country can afford at the present time. You seriously need to do what every individual and private business enterprise has to do in hard times, look at your current spending and find ways to curb it.

Do you have feedback on the other matters raised or anything else?

* Fees and charges

Feedback on other matters

Again I wish to express my desire for ES to keep a lid on expenditure in these difficult financial times. Everyone and every organisation has to tighten their belt in tough financial times and local bodies should be doing this too.

When councillors hear submissions on this consultation document, do you want to present your views in person?

* Yes

Do you require any support to do so?

* Yes

Contact Number

61 - Mr Steve Mear

Submission Number: 61

Submission Date: 13/05/24 03:27

Respondent: Mr Steve Mear

Email: steveme36@gmail.com

Environment Southland Long-term Plan

Comment Number: 1

Do you support our preferred option or do you have another view?

Do you have any further feedback?

* Yes

Other feedback

Ladies and gentlemen of Environment Southland, my main objection is the flippancy of which you intend to indebt future generations of constituents with little if not zero consideration of their economic situation, let alone the global fiscal environment of the moment. I would advise you live within your current budget and maybe cut costs from the top down.

kind regards steve mear

Do you have feedback on the other matters raised or anything else?

* Climate change strategy

Feedback on other matters

Climate changes, nobody can argue with that. Whether its a man made and taxable phenomenon is a highly contentious subject. I beg more investigation into this issue before any rash expenditure.

thanks steve

When councillors hear submissions on this consultation document, do you want to present your views in person?

* Yes

Do you require any support to do so?

* No

Contact Number

0274567904

62 - Mr Laurance Paterson

Submission Number: 62

Submission Date: 13/05/24 04:29

Respondent: Mr Laurance Paterson - Waikaka Station

Email: laurie@waikakastation.co.nz

Environment Southland Long-term Plan

Comment Number: 1

Do you support our preferred option or do you have another view?

Do you have any further feedback?

* No

When councillors hear submissions on this consultation document, do you want to present your views in person?

* Yes

Do you require any support to do so?

* No

Contact Number

0274365747

SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ



To: Environment Southland
220 North Road
Waikiwi
Invercargill 9810

Submission on: **Draft Long-Term Plan 2024-34**

Date: 13 May 2024

Submission by: Southland Province of Federated Farmers

Jason Herrick
SOUTHLAND PROVINCIAL PRESIDENT
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**SUBMISSION TO ENVIRONMENT SOUTHLAND
LONG-TERM PLAN CONSULTATION DOCUMENT 2024-2034**

1. INTRODUCTION

- 1.1 The Southland province of Federated Farmers (SFF) welcomes the opportunity to submit to Environment Southland (ES) on its *Long-Term Plan Consultation Document 2024-2034*.
- 1.2 Federated Farmers submits on Annual Plans (**APs**) and Long-term Plans (**LTPs**) throughout New Zealand and make constructive proposals whenever the opportunity is provided.
- 1.3 Federated Farmers also submit on central government policies that affect local government revenue and spending, with the aim of ensuring that local government has the appropriate resources to carry out their functions.
- 1.4 Federated Farmers base our arguments on the considerable cost of rates to farm businesses, in terms of the value and relative accessibility of farmers to ratepayer funded services, the rates levels on farms compared to other residents and businesses, and the failure of property value to reflect the incomes of farmers and their relative ability to pay.
- 1.5 SFF feedback represents the views of 1,278 farming members and rate payers from the Southland region. We gently remind ES of this so that our members' views, expressed here, are weighed appropriately.
- 1.6 We acknowledge any submissions from individual members of Federated Farmers.
- 1.7 Federated Farmers is focused on the transparency of rate setting, rates equity and both the overall and relative cost of local government on rural ratepayers.
- 1.8 SFF is conscious that there may be significant 'consultation fatigue' out in the community, following the 18 months' worth of significant central government proposals.

- 1.9 Our members do not want their busy silence to be misconstrued as disinterest in the proposed changes. Given the challenging regulatory and economic environment we are currently in, we acknowledge this may result in a low response rate to the consultation process.
- 1.10 We thank the Council for extending the submission period. With submissions previously closing on the opening weekend for duckshooting season, an important weekend for many of our members, providing more time will ensure meaningful feedback is received.
- 1.11 SFF requests the opportunity to discuss this submission with the Council during the hearing process.

2. SUMMARY OF RECOMMENDATIONS

2.1 SFF recommends that:

- 2.1.1 Council consider all proposed projects in the LTP and prioritise only those that are essential, to reduce the overall rate increase.**
- 2.1.2 Council exercises responsible governance and revises its LTP budgets to constrain expenditure increases to no greater than the rate of inflation over the 10 years of this LTP. It should be noted that any form of rate or user charge (to fund that expenditure) will impact on rate payers and ultimately the regional and national economies.**
- 2.1.3 Council should increase the UAGC to fully use the UAGC mechanism at 30% of the total rates income.**
- 2.1.4 Council should detail the specific activities/services in the R&FP which the UAGC covers to provide transparency for ratepayers.**
- 2.1.5 Council delay the impact of any changes to the Flood Protection and Infrastructure rate for a minimum period of one year following LTP adoption.**

- 2.1.6 Council abandon the Council's 'proposed option' and opt for the status quo or a UAGC+targeted rate for funding flood protection and infrastructure.**
- 2.1.7 Council constrain all increases relative to fees and charges to account for actual costs.**
- 2.1.8 Council ensure that budgetary oversight is maintained for Catchment Liaison Committees as these committees are the experts on their local area.**
- 2.1.9 Council ensure that any funds held in reserves by Catchment Liaison Committees remain within those catchments and that the Committees hold jurisdiction over how the funds are spent.**
- 2.1.10 Council delays adoption of Plan Change Tuatahi which is currently scheduled for notification before the end of this year until more clarity on freshwater management is provided from central Government.**

3. GENERAL COMMENTS

Executive Summary

- 3.1 Southland Federated Farmers has significant concerns regarding the Council's proposed LTP. The rating changes and proposed regionalisation of rates will have widespread impacts. We are concerned the Council has not adequately considered the impact on the rural community who are facing dire circumstances in the current economic climate. While we understand the Council is comfortable it has met its legal requirements for consultation, in our view the consultation has not reflected best practice. Proposing rating changes of this scale should be consulted on prior to the LTP. We are also concerned that the Council has made little attempt to curb it's spending and is instead operating with increased staffing numbers. If we are all in this together, as the Council purports, then uniform charges must be maximised to spread the cost of Council services across the region.**

Cost of farming crises

- 3.2 Farmer income for 2024 is not expected to increase. Within the sector, we refer to this as a ‘cost of farming crises’. Interest rates remain high, adding pressure to farmers in the district who are heavily geared. When interest rates do come down, the rural sector is the last to benefit. Federated Farmers has called on the Government to conduct an independent enquiry into rural banking¹.
- 3.3 Federated Farmers' latest Banking Survey, carried out in May 2023, showed a noticeable upswing in the number of farmers who felt they had come under undue pressure from their bank. Numbers were up from 17% in November 2022 to 24% in May 2023. This is the highest level since the surveys began in 2015. The survey also indicated that farm interest rates had increased sharply, with an average interest rate of 7.84% in May 2023, up 4% from a low of 3.79% in May 2021.
- 3.4 We refer the Council to the recent work of Beef + Lamb² about the dire economic position farmers find themselves in. We ask that councillors read this in full, given the wider implications of the Council's work programme beyond the LTP. The summary for 2023-24 states:
- *Farm profit³ is now forecast to decrease an estimated 54% compared to 2022-23 — to an average \$62,600 per farm. The original forecast was for a decrease of 31 percent.*
 - *The expected 54% decrease follows a decrease of 29% the previous year.*
 - *Adjusting for inflation, the expected level of profitability for 2023-24 is broadly similar to the 1980s and early 1990s and is the lowest farm profit since 2007-08.*
- 3.5 Extensive sheep and beef farms face the greatest declines in profitability mostly due to a greater reliance on sheep revenue. Many farmers will be making a cash loss and will be forced to borrow just to survive and pay rates.

¹ Federated Farmers, press release [Federated Farmers call for independent inquiry into rural banking \(fedfarm.org.nz\)](https://www.fedfarm.org.nz)

² Beef & Lamb NZ - March 2024 Mid-Season Update <https://beeflambnz.com/sites/default/files/2024-03/Mid-Season-Update-2023-24.pdf>

³ . Farm Profit before Tax is used to meet tax, personal drawings, principal repayments, capital expenditure and development of the farm.

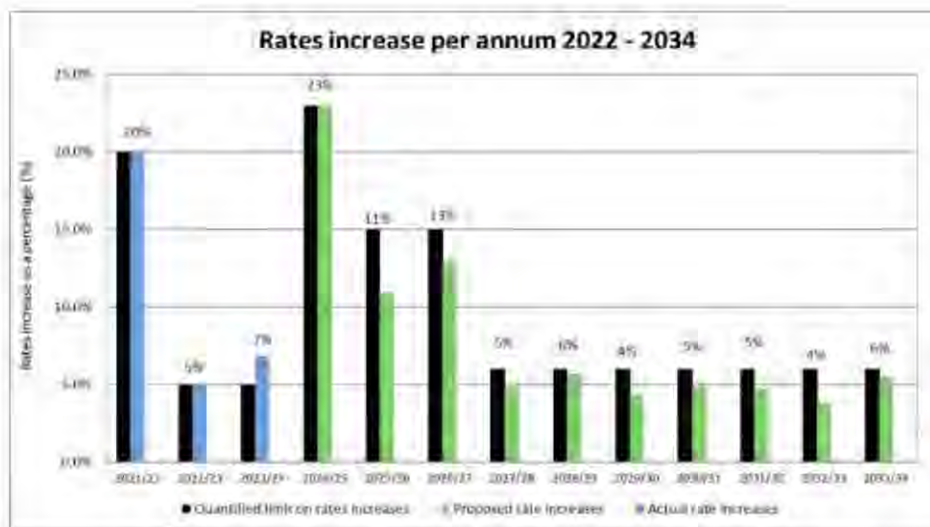
- 3.6 Additionally, the Beef + Lamb report states:
- The outlook for 2023-24 is for fine wool prices to decrease by 12 per cent
 - Beef and veal exports are forecast to be 3.6 per cent down on 2022-23
 - For sheep and beef farms, expenditure is forecast to increase 3.5 per cent to average \$565,800 per farm for 2023-24.
- 3.7 The costs of production have increased significantly across the board. Machinery costs are estimated to have increased by 30%, and fertilizer has also increased significantly.⁴

Rates and expenditure

- 3.8 The Council proposes rate increases which average at 23% for Year 1, 11% for Year 2 and 13% for Year 3. However, these averages vary based on property type due to the proposed change in the rating system which will have a widespread impact.
- 3.9 SFF is extremely concerned about the increase in operating expenditure (15%) for 2024/25 compared with 2023/24 (an increase of nearly \$7m in absolute terms). We ask that Council shows leadership and takes responsibility, in its governance role, to constrain its expenditure increases to no greater than the rate of inflation over the 10 years of this LTP.
- 3.10 As per below from the Council's proposed Financial Strategy⁵, planned increases in total rates income for 2024/25 will not exceed 23% for 2024. It is appreciated that for Year 1 of the LTP, a higher rate increase is common. However, in 2023/24 the Council exceeded its self-imposed limit on rates by 2%. If the Council is comfortable in exceeding the rates increase as it did last year, there is no certainty that this will not occur again.

⁴ Newshub [Harvesting of crops up on last year, but increased costs worry farmers | Newshub](#)

⁵ Environment Southland, proposed Financial Strategy [1 Draft Financial Strategy.pdf \(es.govt.nz\)](#)



NB: Proposed average rates increases are within the quantified limit (maximum) outlined above

- 3.11** Farmers in the Southland region are also facing significant rate increases from their district councils (for example, Gore District Council - 21.4% and Invercargill City Council - 9.17%). The significant rate increases combined across both district and regional councils will hit farmers hard. Both regional and district councils need to ensure that all possible measures are taken to reduce the rating burden on rural communities.
- 3.12** We remind Council of its obligation to ensure prudent stewardship and the efficient and effective use of its resources (s14(g), Local Government Act 2002). Implementing significant changes to the rating system in the midst of cost of farming and cost of living crises, is not appropriate. The economic well-being of rural communities must be considered. It is our view that Council has prioritised environmental well-being at the expense of rural social and economic well-being in proposing the additional spending.
- 3.13** When considering such a significant rate increase, we would hope that the Council has carried out an in-depth analysis of all work programmes to identify potential cost savings. As per s 77 of the Local Government Act 2002, the Council must, in the course of its decision-making process, seek to identify all reasonably practicable options and assess those options in terms of advantages and disadvantages. It is hoped that this level of detailed analysis occurred when determining 'what stays and what goes' in the proposed LTP. Council must ensure that there are clear, positive outcomes for every dollar spent.

- 3.14 It is important in a time where there are significant financial pressures, that Council focusses on its core business. The Council should be constraining its expenses relative to staffing levels and business growth. The focus must be on core business, and directives from central government.
- 3.15 One way to reduce expenditure would be to delay work on Plan Change Tuatahi which is currently scheduled for notification before the end of this year. There are also good reasons to delay this from a planning perspective and we discuss these later in the submission.
- 3.16 When considering the impact of the rating changes, 40% of rural ratepayers will be subject to a rate increase under this proposal, including 653 rural ratepayers subject to an increase of \$200+. Of those 653, 160 are subject to a minimum \$500 increase. The rating increases, coupled with rising costs across the agricultural sector, will put financial pressure on farmers.
- 3.17 **Recommendation: that Council consider all proposed projects in the LTP and prioritise only those that are essential, to reduce the overall rate increase.**
- 3.18 **Recommendation: that Council exercises responsible governance and revises its LTP budgets to constrain expenditure increases to no greater than the rate of inflation over the 10 years of this LTP. It should be noted that any form of rate or user charge (to fund that expenditure) will impact on rate payers and ultimately the regional and national economies.**

Regionalisation of rates

- 3.19 A theme which is evident in the funding approach is 'we're all in this together' or regionalization of rates. SFF strongly oppose the idea of a central pot for rates as there are clear accountability and transparency issues. Such an approach warrants the maximum use of the Uniform Annual General Charge, however the Council has opted to reduce uniform charges.
- 3.20 As an example, the catchment reserve funds are proposed to be absorbed into a central pot which will be used across the district. This approach undermines the careful financial oversight of Catchment Liaison Committees, and will likely lead to the money being spent in urban areas.

- 3.21 SFF strongly opposes the regionalization of rates, and asks the Council to reconsider this approach.

Uniform Annual General Charge (UAGC)

- 3.22 Federated Farmers strongly supports use of the full 30% of total rate revenue allowed to be allocated to the UAGC under section 21 of the Local Government (Rating) Act 2002 where rateable properties get a benefit from Council services. Where council services are in large part used by people, a uniform charge at least ensures that all property owners make some reasonable contribution toward the cost of such services.
- 3.23 Use of the UAGC strongly influences the distribution of rates across properties in a district or region. Its effect is to rectify the impact of capital value rates for higher value properties, while ensuring lower value properties pay a little more. Owning a farm is not a good reason to pay hundreds of dollars towards work that sees an equal benefit, such as economic development. That just isn't rational, let alone fair, and in no way supports economic well-being of the rural sector.
- 3.24 Environment Southland maintains a low UAGC, resulting in an inequitable share of rates being paid by the rural community. Much of Council expenditure benefits the whole region, and this should be reflected in the base level of rates contributed by all ratepayers through maximising the UAGC.
- 3.25 Maximising the UAGC is incredibly relevant in a region such as Southland, where there are a significant number of high capital value properties. The Council should utilise the UAGC at 30% of the total rates income, to provide equity for all ratepayers.
- 3.26 The UAGC is proposed at \$120 for 2024/25, down from \$143 in 2023/24. Elsewhere in this submission we propose options as to how the Council could increase the UAGC. Functions such as Governance should be fully covered by the UAGC as all ratepayers benefit equally from council representation.
- 3.27 When reading the draft Revenue & Financing Policy, we find there is a lack of detail on what the UAGC is used for. We suggest that the Council list out the specific activities in which the UAGC is intended to cover and the proportion of those activities in relation to other funding sources.

- 3.28 **Recommendation: that Council should increase the UAGC to fully use the UAGC mechanism at 30% of the total rates income.**
- 3.29 **Recommendation: that Council should detail the specific activities/services in the R&FP which the UAGC covers to provide transparency for ratepayers.**

Proposed option for rating Flood Protection and Infrastructure

- 3.30 The Council signifies that change is required in how rates are collected for flood protection and infrastructure.
- 3.31 SFF has major concerns regarding the Council's approach to engage the community on options for rating flood protection and infrastructure when considering best practice for engagement.
- 3.32 We would have liked to see a greater effort from the Council to engage the community as per the Local Government Act 2002 (LGA) and the Council's Significance & Engagement Policy. The Council has packaged several important matters into a 'bulk consultation' for this LTP and provided limited options for the community to consider. This rail roading approach fails to truly engage the community.
- 3.33 The Principles of Consultation (s 82(1)(a-f), LGA) require councils to:
- Provide reasonable access to relevant information.
 - Encourage people to present their views.
 - Give clear information concerning the purpose of the consultation and the scope of the decisions.
 - Provide reasonable opportunity to present views.
 - Provide access to a clear record or description of relevant decisions made by the local authority and explanatory material relating to the decisions.
- 3.34 There are also requirements under s 77 in relation to decisions which requires councils to 'identify all reasonably practicable options for the achievement of the objective...' and 'asses the options in terms of their advantages and disadvantages' (s 77(1)(a)&(b)). The consultation document contains limited

options, only presenting the 'preferred option' and this makes it incredibly difficult for the community to debate alternatives.

- 3.35 An appropriate approach would have been to consult on a change to the rating system through the Revenue & Financing Policy *prior* to consulting on the LTP. This is a common approach across other councils.
- 3.36 However, as the Council has chosen to combine the R&FP and LTP consultations, we now request that the Council seriously consider the options we propose, which represent the views of many farmers in the region.
- 3.37 We have been informed by some Council staff that Council expects the community to develop the options as part of this consultation. We understand that the Council must adopt a LTP by 30 June, therefore our recommended options must be given consideration when Council is deliberating on the LTP.
- 3.38 SFF argues for a UAGC component to fund flood protection and infrastructure. The UAGC should be maximized for this activity as flood protection provides a region wide benefit. This approach also supports the Council's position of 'we're all in this together'.
- 3.39 SFF strongly opposes the Council's proposed option. We do not agree with the regionalization of catchment/class-based rates and urge the Council to adopt a funding model which implements a UAGC component. The remainder of funding required should be rated using a catchment class based system, with those funds remaining available for use within the areas they were rated from.
- 3.40 We have not conducted financial modelling on this approach, but we believe that the UAGC could be increased to approximately \$229 per rating unit (an increase of \$129). The remainder required to fund flood protection could be applied per catchment or class through a targeted rate.
- 3.41 It is understood that Council conducted modelling on a higher UAGC than proposed but that the concern was regarding the impact on residential properties. However, when determining rates it is important to consider who benefits. Flood protection and infrastructure has a clear region-wide benefit therefore, while there may be an impact on residential properties, it is important that they too pay their share as a beneficiary.

- 3.42 We propose two options for the Council to consider under which Catchment Liaison Committees maintain their budgetary oversight with catchment reserve funds remaining within the catchment.

	Rating	Application
Option 1	Status quo	No change to current system
Option 2	UAGC component + Targeted rate applied per catchment/class	All ratepayers in Southland region pay a portion through the UAGC (which is maximized to the full 30% allowed), and ratepayers within catchments pay a targeted rate based on catchment or class. This money remains within the catchments with oversight by the Catchment Liaison Committees

- 3.43 **Recommendation: that the Council delay the impact of any changes to the Flood Protection and Infrastructure rate for a minimum period of one year following LTP adoption.**
- 3.44 **Recommendation: that the Council abandon the Council’s ‘proposed option’ and opt for the status quo or a UAGC+targeted rate for funding flood protection and infrastructure.**

Fees and Charges Schedule

- 3.45 ES proposes some significant increases to fees and charges applicable to farmers, as detailed below. SFF is concerned that these increases, coupled with rates rises from councils, will put farmers in a difficult financial position. There is limited rationale on why these large increases are required.

Fee description	Current fee (\$) (Excl. GST)	Proposed fee (\$) (Excl. GST)	Increase (\$)	Increase (%)
Groundwater monitoring - with sample	278	600	322	116%
Groundwater monitoring - without sample	225	313	88	39%
Surface water take – minor	177	225	48	27%
Surface water take - large	257	600	343	133%
Groundwater take - minor	177	225	48	27%
Groundwater take - large	257	600	343	133%
Groundwater take - significant	257	600	343	133%

- 3.46 The Council proposal document for Fees and Charges at point 4 highlights that “Charges must be transparent” and goes on to say that charges should be calculated in a way that is clear, logical and justifiable. It also points out that “Charges should be clear and easy to understand, and their administration and collection should be simple and cost effective”. With that context in mind, Southland Federated Farmers have some questions regarding the detail of how fees and charges will be calculated.
- 3.47 For example, in the table above, an increase of \$322 for ground water monitoring is an increase of 116%. It is not clear if this is for a single sample taken or is this for

the whole ‘monitoring’ process. Does this charge also include staff cost and travel time as per the calculation (staff hours x hourly charge out rate) + disbursements = charge payable). It is not clear what this specific increase is for with the “ground water monitoring (with sample)”. Compared to the ground water monitoring without a sample it is a smaller (\$88) increase – but still substantial in the context of increases. If a ratepayer is paying \$600 for a single groundwater sample monitoring, does that \$600 cost include analysis or does that get included in the disbursement cost?

- 3.48 Section 5.1 of the Fees and Charges proposal details the Annual Resource Consent Holder Charges. Section 5.1.2 details the Science Research and Management Charge covered by s36(1)(c). The section states that “The research charge contributes towards the costs incurred by Council in researching and identifying the cumulative impact on our environment of all such activities across the region. Information gained from this research can also be used by applicants during the resource consent application process”. As part of the transparency in this Fees and Charges process, more clarity on how Council calculates the cumulative effects on the environment. the charges for science data collection is not clear and transparent.
- 3.49 Section 5.7 describes the charges for monitoring of permitted activities covered by the National Environmental Standards for Freshwater. Given Governments intention to repeal the National Standards for winter grazing we would expect and education first approach to encourage and support landowners to continue with best practices.
- 3.50 The proposal document says that the “consent holder benefits through the protection of resources through management, early warning of changes in resources and information and data to aid business planning, exercising of their consent and re-consenting process” but there is no detailed information that explains what that science research and management process is or what research is undertaken – or the level of detail that this provided to consent holders as part of this process.
- 3.51 We understand from the Climate Change strategy that there is a proposed focus on data collection – if the increase in science research and management is related to the proposed climate change strategy aim for science focus and data collection we understand and stand behind the science approach, however, this needs to be a

transparent process and a clear science strategy needs to be developed that isn't just part of cost included for a consent holder.

- 3.52 Section 5.8.1 covers the approach to cost recovery for Fresh Water Farm Plans. Given the clear steerage from the Government on FWFP we think it prudent to pause on this charging schedule and focus on the Farm Management Plan.
- 3.53 Table 11 "Discharges to Land" includes some substantial increases in costs for "Science Research and Management Charges". It isn't clear and transparent what the increase is for. We also note that the Science and Research Management cost is included per inspection – not a one off charge.
- 3.54 Table 12 "Discharges to Water" includes a huge increase in cost for Science Research and Management Charges, a medium discharge has a flat Science Research and Management Charge of \$2233 not including the actual monitoring costs. For such a substantial increase more detail of the breakdown of what that cost entails is required.
- 3.55 **Recommendation: that the Council constrain all increases relative to fees and charges to account for actual costs.**

4. COMMENTS ON KEY ISSUES

Investing in flood protection and infrastructure

- 4.1 The Council is proposing to increase operating expenditure by \$2.3million per annum to be funded by a proposed new Flood Protection Infrastructure Rate. The proposal results in an increase of \$239 per property valued at \$5million. The LTP proposes \$14million to be spent on capital works in Winton, Lumsden and Waihōpai over the next three years.
- 4.2 We have made comments regarding the regionalisation of rates, however we are also concerned about the significant increase being made with little detail on how the money will be used. Farmers support flood protection measures as there is a clear benefit to them as custodians of their land, however it is important that investment is made in the right areas. Farmers are not focussed on small rate cuts, they want to see proper action taken for flood protection and a collaborative approach in determining the course of action.

- 4.3 With the cost of living/farming crises we are facing, expenses must be restrained and the Council must ensure that it is being a prudent steward of rates. From the information provided as part of this consultation, we are not confident that we have all the information needed to support such a significant investment.
- 4.4 A suitable approach would be for the Council to consult with farmers on different options for flood protection and present these options in the Consultation Document. For example, there could be a low-investment, medium-investment and high-investment option with rationale as to why the Council has opted for their preferred option. The lack of analysis on this can only lead us to question the dollar amount of the investment. We urge the Council to tighten up the budget and consult with farmers to achieve the best possible outcome for the entire region.

5. OTHER ISSUES

Revenue & Financing Policy – changing how we rate

Issue 1 – Creating a new Flood Protection Infrastructure Rate based on capital value to replace 140 Catchment rates

- 5.1 Council proposes to introduce a new Flood Protection Infrastructure Rate applicable to the entire region, replacing 140 existing rates, on the basis of capital value. The Council sites reasons for this such as the current system no longer ‘fit for purpose’, the desire to include all the region to funding this rate, and the need for greater flexibility of investment.
- 5.2 Under the Council’s preferred option, operating expenditure would be increased by \$2.3million per annum and funded by a new Flood Protection Infrastructure Rate utilising the general rate (capital value). The Council notes the average annual rate increase for the proposal is \$22 per year (\$450k CV) and \$239 per year (\$5million CV).
- 5.3 The Council states:
- Funds held in reserves for these areas will still be applied to this area.
Catchment Liaison Committees will still continue and will work closely with our team on asset management planning to ensure the best outcomes for their communities are achieved.*
- 5.4 Based on the above statement, a major concern of SFF is that the reserve funds of catchments will be absorbed into a central pool. There are clear equity issues evident. Catchment Liaison Committees have been prudent observers of their

funds, and shifting their reserves to a central pot undermines the existence of committees. SFF is strongly opposed to any catchment reserves being centralised.

- 5.5 Additionally, SFF is opposed to any new rates collected being regionalised into a central pot. If all expenditure is funded from a central pot based on capital value, then farmers will end up funding a significant share of urban work. In particular, the climate resilience work totals around \$18million and is predominately urban (situated in Invercargill, Wyndham, Mataura, Gore, and the Lake Hawkins pumps). Yet rural ratepayers will be expected to front up the majority share of the bill all because of the high capital value of their properties. There are clear equity issues here and we ask the Council to seriously reconsider this funding mechanism in light of the beneficiary pays principle.
- 5.6 The Council identifies that changing the long-established catchment rating model carries a high degree of risk. However, we are not aware of any risk assessments being carried out with the Catchment Liaison Committees and would have expected the Council to have conducted this, at a minimum, as part of the LTP development.
- 5.7 Another major concern is the loss of local representation and voice through Catchment Liaison Committees. We strongly object to this regionalisation approach and see the removal of budgetary oversight from Catchment Liaison Committees as an initial attempt by the Council to abolish these groups. For the rural community, this is devastating as these committees ensure accountability of the Council through managing the catchment's natural resources.
- 5.8 There are many examples both nationally and internationally where local catchment groups are a successful model. The collaborative decision-making ability is what sets these committees aside from the rigid and overly formal structure of local councils. Council should be promoting localism through these groups, as what is being proposed feels like an attempt to strip the rural community of their voice.
- 5.9 We have developed alternative options for funding this activity which are detailed earlier. We emphasise that all ratepayers should contribute in some form, through a UAGC component and specific funding per catchment is obtained. This catchment based funding would ensure that those who pay towards a catchment benefit directly from the funds (beneficiary pays principle). Catchment funds raised within the catchment must stay in the catchment, and this principle is also applicable to any funds held in reserves. The options we have developed also ensure that Catchment Liaison Committees maintain budgetary oversight. The UAGC component can be used to fund urban works. Note – we have not carried out modelling this option and urge the Council to engage with the community on these new options.

- 5.10 Recommendation: ensure that budgetary oversight is maintained for Catchment Liaison Committees as these committees are the experts on their local area.**
- 5.11 Recommendation: ensure that any funds held in reserves by Catchment Liaison Committees remain within those catchments and that the Committees hold jurisdiction over how the funds are spent.**

Issue 2 - moving the Biosecurity and Land Sustainability Rates (land value) into the General Rate (capital value)

- 5.12** The Council propose moving from land value rating to capital value rating for Biodiversity and Land Sustainability Rates. Under the current model there are two region wide targeted rates based on land value.
- 5.13** In the Revenue & Financing Policy Statement of Proposal, the Council states: *All ratepayers benefit from a healthy environment and economically we are all connected. No longer are the largest landowners the main beneficiaries.* However, shifting to a capital value rating system will mean that farmers with a high capital value, i.e. dairy farms, will now pay a significant amount towards this rate.
- 5.14** Given the universal benefit to all ratepayers of biosecurity and land sustainability, the Council should implement a UAGC component to funding this rate.

Policy on Financial Reserves

- 5.15** SFF opposes the proposed Policy on Financial Reserves. We have concerns regarding the catchment reserves, and the absorption of these funds into a central pot (albeit to be used for the same activity but on a less specific scale). The Council should not be proposing any changes to how reserves are managed/distributed until it has confirmed its rating system.

Significance and Engagement Policy

- 5.16** A collaborative approach and early engagement with the community should be a key focus on the Significance and Engagement Policy. The purpose of the policy is outlined in the Local Government Act and is relied on by the community to ensure that when things occur locally that are important to them, and their voices are heard.
- 5.17** An early engagement approach also has the benefit of saving costs and time for all parties. Issues or concerns at a local level are identified and potential solutions worked through.

- 5.18 Federated Farmers recommend that Council look to other councils for good examples of Significance and Engagement Policies that encourage the collaborative approach and develop a policy that references and uses examples and context of Southland. The Policy as it stands could be for any region or district in NZ. A local lens and examples could help communities understand the reference of the policy and still fulfil the requirements of the Act. Other Council examples of a more local lens include Ashburton District Council⁶.
- 5.19 Federated Farmers recommend that checks are made to ensure that the Policy aligns with the wording of the Act to provide clarity and ensure that interpretation and meaning of phrases are not confusing to ratepayers.
- 5.20 The definition of Engagement in the policy includes the phrase “A discretion remains for the Council to engage with the community at any time irrespective of the significance of the criteria”. The inclusion of the word discretion means council have the freedom to decide whether they should engage with the community irrespective of the significance of the criteria. This does not seem fair or appropriate, especially when some an issue that is important to the community that triggers the significance criteria, yet the council have an option to use their discretion to engage. Clarity and transparency in processes help engage communities, and the Local Government Act clearly defines the purpose of the Significance and Engagement Policy. We understand that there needs to be an option of council discretion available, but the use of that discretion should be clear and transparent to the community. However, if the intention of this definition is that Council may still engage even where it is not legally required to then we suggest rewording this to clarify.
- 5.21 The definition of “Significant Activity” is defined in the Significance and Engagement Policy as “ Any activity that:
- affects all, or a large portion of the region;
 - affects all, or a large portion of the community;
 - will result in a substantial change or removal of a significant activity or service;
 - relates to a listed strategic asset;
 - will require or incur annual expenditure of more than 10 percent of the Total Operating Expenditure not already provided for in Annual Plan or LTP budgets or not provided in existing delegations, policies or other legislation (e.g. disaster response or emergency works). Expenditure funded by external funding is excluded from this definition.

⁶ [Community-Engagement-Policy-2021-Significance-and-Engagement-Policy.pdf \(ashburtondc.govt.nz\)](#)

- 5.22 Both the word “Activity” and “Significant” are defined in the Local Government Act – and have different meanings to the interpretation that is provided in the policy. The definition of Significance in the Policy comes directly from the Local Government Act interpretation section. We would recommend consistency in use of terms that aligns with the Act.
- 5.23 Section 3(c) of the Significance and Engagement Policy states that “the Council will take into account the following matters when assessing the significance of proposals and decisions, and the appropriate level of engagement”. The Local Government Act s76AA states that the Council include “proposals, assets, decisions, or activities are significant or may have significant consequences”. The Council policy should include similar terminology to reflect what is required in the Act.

Proposed Regional Climate Change Strategy

- 5.24 Federated Farmers agrees with the importance of including science in the collective values. Science, including observation and the collection and recording of data is the key to understanding more about the environment around us. Where the potential risk is with the last aspiration (4) being “we will create meaningful change within one generation” or 25 years as noted in the footnote. One of the issues we are dealing with is the lack of data and information – for some things a 25 year time frame may not be enough to be able to record or measure change. However, the term ‘aspiration’ is defined as a hope or ambition of achieving something and not a closely measured thing. The phrasing to include one generation puts pressure on a range of activities that may not be measurable in that time frame.
- 5.25 The principle of Whakarāneiei/anticipation is defined as meaning to ‘adopt a data driven approach in developing proactive action plans’. Federated Farmers supports the science led approach and encourages a robust and transparent science led approach that addresses rural communities and catchment issues. This principle is referenced in the connection with the proposed planned investment in critical infrastructure for flood protection. Federated Farmers would like more specific clarification on what the data driven components of this planned investment are. The Climate Change Strategy emphasizes the importance of the other principles of inclusivity, alignment and understanding. For all of these key proposed projects it is crucial that the engagement is fair and transparent, with a “transparent sharing of knowledge”.
- 5.26 The primary sector in Southland represents many generational farms with a stewardship view of their properties in terms of their future generations. The wording for 4 could be adjusted to “We will create meaningful change and inspire future generations to continue this work”.

- 5.27 The flow on effect from the aspirations is to ensure that a strategy is in place to ensure that the science plan is in place to collect, measure and record the right data. We would like to see early engagement with stakeholders including the primary sector to ensure a robust future plan is in place.
- 5.28 Federated Farmers acknowledges the sensible approach taken of a joint approach by all four councils in this strategy to ensure transparency, collaboration, and engagement.
- 5.29 The specific aspirations include mitigation, and the descriptive paragraph includes “this will enable councils to understand the challenges businesses and other organisations face in reducing emissions and aid the efforts towards developing a best practice consistent approach”. The primary sector is at the forefront of adaptive change and improvement including on farm practices, improvement in genetics (low input, improved production efficiency). For councils to understand local challenges and issues will be a further step towards a collective approach and understanding of issues. As said for other issues, a collaborative approach that involves early engagement and stakeholders to help identify and address issues early. For councils to understand their mitigation role within the community they need to ensure that those conversations and connections are embedded in the process.
- 5.30 The Adaption aspiration references that the four “councils will need to align on climate change scenarios to inform regional planning decisions, as well as collaborate to consider regional issues anew with a climate change lens”. The joint collaborative approach will only be beneficial. As part of the collaboration, stakeholder engagement should involve a process of all four councils plus stakeholders to ensure the process is transparent.
- 5.31 Point 8 references “we fully understand the risks and opportunities to our communities associated with the impact of our changing climate on Murihiku Southland”. The term “communities” needs to be interpreted broadly to encompass the full range of people, places, environments, etc that this includes.
- 5.32 Point 9 references that “councils align on climate change scenarios to inform key regional decisions”. The alignment requirement for councils implies that there will be a structural framework in place for how the councils will engage and work together towards these objectives. A collaborative and transparent process that engages directly with rural communities is preferred.
- 5.33 Point 10 references that councils “collaborate to create regional pathways for action, acknowledging the inter-connectedness of specific issues”. Federated

Farmers views the collaborative approach as a good thing but would like to ensure that the rural sector are part of these collaborations, especially when they are likely to include topics listed such as biodiversity, sustainable transport, carbon forestry, and water availability.

- 5.34 Council was granted a \$370,000 grant from the Ministry for the Environment last year for a two year climate adaption project “Murihiku Slow the Flow”, aimed at identifying ways of better protecting high flood risk areas in Southland. The final objective of this project is to establish a climate adaption ‘community of learning’ that engages and involves the local community, including catchment liaison committees and catchment groups, in exploring the opportunities, benefits, and barriers associated with the identified nature based solutions options. The project is scheduled to end in June 2025. As part of the climate change strategy, Federated Farmers would like to see where this project has go to in terms of its project milestones, especially in terms of its involvement with the local rural communities.

Plan Change Tuatahi

- 5.35 The Council intends to amend the proposed Southland Water and Land Plan (pSW&LP) through Plan Change Tuatahi to include freshwater objectives/outcomes, limits, targets and methods (for discharges to and abstractions from waterways). Work on this has begun and we believe the Council intend to notify Plan Change Tuatahi by the end of the year.
- 5.36 The Government has recently announced that it intends to remove intensive winter grazing rules and Te Mana o Te Wai in the first tranche of the Resource Management Act 1991 (RMA) amendment bill.
- 5.37 As the Council will be aware, there are also concerns regarding the impact of recent court decisions relating to s 70 and s 107 of the RMA. This need has arisen due to the March High Court ruling against the Canterbury Regional Council (*ECan*) on the granting of the Ashburton Lyndhurst Irrigation Limited (ALIL) scheme discharge consent, as well as the Environment Court and subsequent High Court rulings against Environment Southland in relation to a proposed permitted activity rule for discharges from farming activities in the pSW&LP. These decisions signify a need for greater clarity within the RMA, and any corresponding amendments will have implications for the pSW&LP.
- 5.38 In our view, the best course of action therefore is to delay any further work on Plan Change Tuatahi for at least one year until more information has been provided by the Government on freshwater management.

5.39 Recommendation: That Council delays adoption of Plan Change Tuatahi which is currently scheduled for notification before the end of this year until more clarity on freshwater management is provided from central Government.

Federated Farmers thanks Environment Southland for considering our submission.

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.



**FEDERATED
FARMERS**
OF NEW ZEALAND

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.

Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

Do you support our preferred option
or do you have another view?

Investing in flood protection infrastructure

Due to the challenges of Southland's ageing flood protection network and a changing climate resulting in more severe and enduring weather events we are proposing increased and ongoing investment in the region's flood protection infrastructure and river management to increase community resilience.

Preferred option: Increase operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Infrastructure Rate (see Revenue and Financing Policy Statement of Proposal on Rates – www.es.govt.nz).

This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☒

Another option/view

Do you have any further feedback?

ENVIRONMENT
SOUTHLAND
13 MAY 2024
4:04pm OV

We want The Council to stay with
Status Quo where The 2024-2034 LTP
is concerned.
No immediate rate changes

Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.

☒

Yes

☐

No

Please note: Upon request, we are legally required to make all written or electronic submissions available to the public, including the name and address of submitters, subject to the provisions of the Local Government Official Information and Meetings Act 1987. If you consider there are compelling reasons why your contact details and/or submission should be kept confidential, please contact the Council at the address below to make your request known.

Contact details

Name: Geoff Scott

Organisation (if representing): _____

Organisation role: _____

Postal address: 176 Otaramaka Rd.

Postcode: 9871

Email: chris.scott@es.govt.nz

Phone: 0284024852

Signature: [Signature]

We can receive your feedback in a number of ways:



Mail

Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840



Delivery

Environment Southland
Cnr North Rd & Price St
Invercargill



Online

www.es.govt.nz



Email

consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally

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Contact details

Name:

Geoff Scott

Organisation (if representing):

Organisation role:

Postal address:

176 Oteramika Road

Email:

drivescott1650@gmail.com

Signature:

Postcode:

9871

Phone:

0284024852

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Preferred option

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Another option/view

Do you have any further feedback?



Environment Southland LTP 2024 – 2034 submission document 4

Other feedback options 1 to 9 as listed on

This submission is to cover all feedback options. I wish to address all the options individually. Not only the content but also the ambiguity of the Feedback page. Also, there are some very serious breaches of the consultation act 2002. I wish to address each of these individually. Some will be only a matter of, transparency of understanding. Several with have repercussions that should see that the complete consultation process has been broken or completely misinterpreted or represented. I require very little time for most, but several will take just over 5 minutes. So rather than submit all feedback individually I think it would only be fair to allow some leeway and let me submit to all-in-one block rather than each one individually. There are 9 feedback options I estimate I could present to the entire lot in 25-30 minutes at the very most, rather than 45 mins. Geoff Scott I can be contacted email dronescott1650@gmail.com cellphone 0284024852

Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
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Preferred option

☒

Another option/view

Do you have any further feedback?





Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.



Yes



No

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Contact details

Name: Geoff Scott

Organisation (if representing): _____

Organisation role: _____

Postal address: 176 Oteramika Road

Postcode: 9871

Email: drone.scott1650@gmail.com

Phone: 0284024852

Signature: _____

We can receive your feedback in a number of ways:



Mail

Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840



Delivery

Environment Southland
Cnr North Rd & Price St
Invercargill



Online

www.es.govt.nz



Email

consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally



Environment Southland LTP 2024 – 2034 submission document 3

LTP Draft plan to change the rating system.

In regard to the LTP draft plan to change to a capital-based rates system. I object to it on so many levels. Public consultation more appropriately lack of. My family has two properties which will increase under the draft proposal. Both properties do not generate a livable income. In fact, my mother's will actually become a debt producing property should this Draft LTP be implemented. For my mother's property this was both Mum and Dads wish from being farmers- contractors and school bus operators a retirement lifestyle block. Having paid GST Income tax SDC, ICC and E.S rates all their working lives. This Draft LTP doesn't seem to account for Elderly or very low fixed income Families or individuals. I don't believe that I am the only person who believes there will be a vast negative effect on 100s if not 1000s of lives. I wish to the panel on this submission in person. Geoff Scott I can be contacted email dronescott1650@gmail.com cellphone 0284024852

Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

Do you support our preferred option
or do you have another view?

Investing in flood protection infrastructure

Due to the challenges of Southland's ageing flood protection network and a changing climate resulting in more severe and enduring weather events we are proposing increased and ongoing investment in the region's flood protection infrastructure and river management to increase community resilience.

Preferred option: Increase operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Infrastructure Rate (see Revenue and Financing Policy Statement of Proposal on Rates – www.es.govt.nz).

This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐ Preferred option

☒ Another option/view



Do you have any further feedback?

Attached typed submission documents

Other feedback

Do you have feedback on the other matters raised or anything else?

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Contact details

Name: Geoff Scott

Organisation (if representing): _____

Organisation role: _____

Postal address: 176 Oteranika Road

Postcode: 9871

Email: drone.scott1650@gmail.com

Phone: 0284024852

Signature: @

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Environment Southland LTP 2024 – 2034 submission document 2

Flood Protection.

Regarding the proposed changes to the flood protection infrastructure and the hamstringing effects of IWI consents Fish and Game, Forest and Bird. The unrealistic costs of permits for gravel removal I would like to address the panel about these and other issues. I believe we could just stay with a well-maintained Level 3 maintenance infrastructure. I would also like to address the panel on the impacts of wasps to the problems of their nests and the impact to the flood bank's structure. I will also be presenting a solution. I understand its all very well to complain about things but feel it is also in our best interests to also offer a possible solution. For me to present on this particular submission I doubt that that it can properly presented in the 5-minute time frame allowed. I am therefore asking for some leeway for this submission for which I am requesting to present in person. Geoff Scott I can be contacted email dronescott1650@gmail.com cellphone 0284024852

By 5.00pm,
6 May 2024

20

Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
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Yes



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Contact details

Name:

Geoff Scott

Organisation (if representing):

Organisation role:

Postal address:

176 Oteramika Road

Postcode:

9821

Email:

drone.scott1650@gmail.com

Phone:

028402 4852

Signature:



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Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally



Environment Southland LTP 2024 – 2034 submission document 1

1 Consultation notification processes, both legal and morally ethical.

I would like to draw attention to what can only be described as a flawed process. The Public notification starting as far back as the *Envirosouth Autumn 2024* edition. 1a distribution of this magazine was appalling at its best. Both our properties are on the RD1 here in Invercargill. When I queried the number of complaints that had come from not receiving the magazine, I was one of only a few so far. That not only was it our two properties but neighbouring properties as well as lots of properties in the immediate area. I would have had a certain bit of empathy for the distribution team. However, it became apparent over the next weeks that it wasn't an isolated occurrence. It also became apparent it was very widespread. When I queried a staff member re the distribution or lack of that staff member also stated they had not received a copy either. The staff member said someone from the distribution team would contact me, I'm still waiting for that to happen.

2 Magazine content and layout

First, I would like to draw your attention to the front cover of the magazine. The magazine consists of a front and rear cover and 18 pages in between. Having read the magazine now that I finally have several copies on hand. Firstly, if I was picking this up to read, there is nothing attention grabbing on the front or rear covers that allude to something that will have a huge impact on all stakeholders/ratepayers. Page 12 Investing in Southland 2024 – 2034 Long- term Plan consultation. The article goes on to talk about investing in the flood protection infrastructure. Nowhere is there a reference to the change to a capital rating option. This will impact on every stakeholder/ratepayer, some decreasing most increasing. If one of these was delivered to every stakeholder/ratepayer and the appropriate documentation was inside relating to the full discussion on the proposed LTP 2024 – 2034. Also, the other feedback. I would have to say that was a fair and reasonable attempt to contact and make aware to all concerned. This would have made for a much larger magazine but would give more people the opportunity to study something and realise that a major change to their financial structure and base of how the proposed new rating scheme would have an impact on them. Unfortunately, this wasn't the case.

3 Front cover layouts

I would have thought that the front cover layout would have been included in the context of why I would open this magazine. There were only 2 things Looking back remembering the 1984 floods Page 6, and Community reaping rewards, Bluff Hills restoration Page 10. Nowhere was there a byline alluding to the fact that the Draft LTP plan, which will in fact affect everyone, even rated a i.e. LTP looking at changing the rating system this will have an impact on everyone Page?

4 My submission to this particular flawed part of the principles of public consultation. I wish to speak to this submission and will be presenting affidavits to back up my comments. Geoff Scott. I can be contacted email dronescott1650@gmail.com cellphone 0284024852

Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

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Investing in flood protection infrastructure

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Preferred option: Increase operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Infrastructure Rate (see Revenue and Financing Policy Statement of Proposal on Rates – www.es.govt.nz).

This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☒

Another option/view

Do you have any further feedback?



Show us you are prepared to put a hold on this LTP for at least a year.

Everyone is struggling in this financial climate.

Central Government is requiring staff cuts throughout their Government departments. Why aren't you doing the same? So much wasteful spending within your offices.

Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

I want my Son Geoffrey Scott to
Speak on my behalf

JS

Please use additional paper if required.

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☒ Yes

☐ No

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Contact details

Name: Jay Scott

Organisation (if representing): Son representing Mother

Organisation role:

Postal address: 170 Otaramika Road,

Postcode: 9871

Email: drone.scott165b@gmail.com

Phone: 0284024852

Signature: JS

We can receive your feedback in a number of ways:



Mail

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Environment Southland
Private Bag 90116
Invercargill 9840



Delivery

Environment Southland
Cnr North Rd & Price St
Invercargill



Online

www.es.govt.nz



Email

consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally

Tell us what you think

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YOUR SAY**

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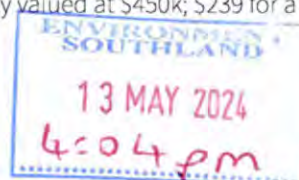
This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☒

Another option/view



Do you have any further feedback?

NZ Rivers often have flow that is not sufficient to wash the excess gravel and silt out of the main water course. Thus causing build up and excess flooding at peak rain times. It is common sense to remove these build ups of gravel and silt, by E.S., Contractors and farmers, and use it for roading tracks etc. Building higher flood banks or more flood banks is not the answer. Use the 25 million dollar reserves to do urgent repairs on flood banks that exist now to level 3 only. We are in an economic recession of mammoth proportions and Environment Southland needs to rein in all unnecessary spending. Ratepayers will not tolerate misuse or excess spending of their hard earned money they pay their rates with.

Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
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- Targeted rabbit control rate
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- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

See attached, stapled pages ① ② end ③ please.

Please use additional paper if required.

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Yes



No

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Contact details

Name:

Christine Audrey Mary Bogers

Organisation (if representing):

Organisation role:

Postal address:

1191 Otautau Tivatapu Rd, RD2, Otautau

Postcode:

7682

Email:

cabogers@gmail.com

Phone:

0273080665

Signature:

Chr A Bogers

We can receive your feedback in a number of ways:



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Private Bag 90116
Invercargill 9840



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Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally

①

* Attachment Page ① to my submission / Tell us what you think
Christine Bogers - phone 02730 80665

1. In March 2024, Environment Southbd (ES) released your statement of proposal for your 2024 rating review, this was part of the Revenue and Financing Policy update.
2. ES also details these rate changes proposal in its Long Term Plan Consultation Document 2024 - 2034. The Long Term Plan states that submissions and consultation for both documents will be heard at the same time.
3. The original rating review document stated, "we will be posting every rate payer a letter telling you how your rates would be affected by this change." (Up until the 22nd of April 2024)
After I asked you where this letter was on your facebook page on 23rd April 2024, you (ES) amended to "we will be posting ratepayers with significant potential cost increases a letter about the proposal, and every mailbox in the region will receive a copy of our regular newsletter with information about the proposal." You, ES, explained that the change was owing to the unreasonable and disproportionate cost of posting to every ratepayer.
4. How does ES determine who will, or is likely to be "SIGNIFICANTLY IMPACTED" by the proposed rate changes? \$10 a week increase in ES rates is SIGNIFICANT if you are on a very tight budget.
5. Has ES sent out to every mailbox in the region, their regular newsletter since the 23rd of April 2024 because I have not received it?
6. Has ES given those ratepayers in Southbd notification of this proposed rates change to Capital Value? 90% of ratepayers I surveyed on 25th April 2024 had no knowledge at all about this. I raised this at ES Public meeting on 29th April 2024. Since then, still no notification to rate payers. Because so few ~~are~~ have are aware of all this, how can they possibly give feedback to ES? by 13th May 2024.

7. Under the Local Government Act 2002:

There is a legal requirement to engage with ratepayers, and to make sure that all affected parties (rate payers) are notified "in a manner and format that is appropriate to the preferences and needs of that/those persons".

A huge percentage of people, who are ratepayers in Southbrol, do not know to keep an eye on ES's webpage for LTP information. A large majority do not have computers.

In my mind, the ratepayers of Southbrol have been treated dreadfully over this whole issue. A letter should have been posted to every ratepayer, regardless of cost. What has happened here defies common decency, respect and good morality.

I will not be paying any increased rating to ES due to total lack of communication, and all of the above.

I call for a halt on this whole process till ratepayers are treated equally and all received a letter in the mail as originally promised.

8. Re the Uniform Annual General Charge (UAGC)

The UAGC helps spread the cost of services across the district. Why are you reducing this fee in the LTP? You are robbing Peter to pay Paul by not putting the UAGC rate up by 30% (to cover inflation) for every ratepayer. Instead you have dropped the UAGC rate. The Extra needed will have to come from ratepayers with higher capital values.

When did ES become the arbitrator of equity, and higher capital value is not equal to higher affordability?

9. In ES's LTP proposal a debt increase of 50 million dollars over 10 years is proposed. Who pays this back, plus interest? We do, the ratepayers. A 286% increase in Borrowing. This is totally unaffordable. We are heading for a massive recession, ES needs to halt this proposal. The result, if this all goes through, will be the nail in the coffin for Southland's economy.
10. If ES do not listen to ratepayers, and allow this to all go through, the snowball affect on the Southland Economy will be DEVASTATING. Every cost and service will increase in cost. The mental anguish rate, rent, lease, food etc increases will cause our people will be also DEVASTATING.
11. Listen to the ratepayers, treat them with the respect they deserve. You have lost sight of the fact that their rates pay for Environment Southland's existence.

Years ago ES had 3 staff on a budget of \$80,000.

What has happened here? We (the ratepayers) can not afford what you are proposing in this LTP. I wish to speak to my submission.

Yours Sincerely

Chris A Bogers

Christine A Bogers, Southland Ratepayer.

Dated 13th May 2024.

Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

Do you support our preferred option
or do you have another view?

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☐

Preferred option



Another option/view



Do you have any further feedback?

I am very concerned at the lack of consultation on your 2024-2034 long term plan document. How on earth can people put in a submission to something they know nothing about. You have been asked on several occasions at meetings to extend the date for submissions out from the 6th May. These requests have been "brushed off".

The country is in recession, people struggling financially. Why aren't you focusing the flood protection infrastructure on more logical solution. Get the gravel out of the rivers. P.T.O

Other feedback

Do you have feedback on the other matters raised or anything else?

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This proposal to rate on Capital Value will impact everyone. Those that can pass on their costs will do just that. This will just put on even bigger costs to the consumer.

Please use additional paper if required.

NO to Capital Value change

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Yes

NO

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Contact details

Name: Shona Stewart

Organisation (if representing): _____

Organisation role: _____

Postal address: 617 Lynch Road RD 1 Otoutaun

Postcode: 9689

Email: brent.shona@rivernet.co.nz

Phone: 0274862082

Signature: S. Stewart 2/5/24.

We can receive your feedback in a number of ways:



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Other feedback

314

Do you have feedback on the other matters raised or anything else?

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As a landowner in the Otara District and a Trustee of the South Catlins Charitable Trust, I support the work of the Southern Pest Eradication Society being funded by a targeted rate.

Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.



Yes



No

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Contact details

Name:

Paul Duffy

Organisation (if representing):

South Catlins Charitable Trust

Organisation role:

Trustee

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Postcode:

9825

Email:

duffy.paul1234@gmail.com

Phone:

0272355365

Signature:

[Handwritten signature]

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Tell us what you think

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Preferred option



Another option/view

Do you have any further feedback?

Strategy, over the course of the 10 years covered by the 2024-34 Long-term Plan. Our indicative budget has included an assumption that this will primarily be funded from years 4 to 10 by Central Government Grants (75%) and the balance by way of debt funding. As a result, debt increases over the course of the 10 years (no current debt; \$15m in year 1 to \$75m in year 10). The proposed level of debt is within the 87.5% of total income self-imposed limit.

Should central government funding not be available, Environment Southland would need to reassess how to proceed with its provisional capital works programme ahead of its 2027-2037 Long-term Plan noting the constraints around debt funding that currently exist.

You can read the full **Financial strategy** on our website www.es.govt.nz.

► Climate change strategy

Environment Southland is working with the other three Southland councils (Gore District Council, Invercargill City Council, Southland District Council) and Te Ao Mārama Inc to develop a regional climate change strategy.

The purpose of the strategy is to support a regional approach, to respond to the effects of a changing climate. This includes the reduction of greenhouse gas emissions and adapting to the changes across the region.

Following the strategy being finalised; a framework for action, including individual council plans, will be developed.

Each of the four Southland councils has endorsed the proposed climate change strategy and they are seeking feedback through public consultation from 29 February – 6 May 2024.

Read the proposed **Regional Climate Change Strategy** and provide your feedback online at www.es.govt.nz.

► Targeted rabbit control rate

Currently there is a rabbit control rate set according to location on all rating units greater than or equal to four hectares contained in the Southland region south of the Mimiha Stream and east of the Maitara River. This rate funds rabbit control by Southern Pest Eradication Society under contract.

When this was initially set up about two years ago, the Council said it would be reviewed when developing the Long-term Plan and, as part of that, it is now open for feedback.

We are particularly interested in whether the ratepayers are comfortable with the targeted rate and satisfied with the service being delivered. We would also like to know whether the affected ratepayers have any other views or suggestions regarding the rate, the service or alternative options.

See our website www.es.govt.nz for more information.

► Infrastructure Strategy

Investing in flood protection infrastructure is a key focus of the Council's 2024-2034 Long-term Plan. Due to the challenges of Southland's ageing flood protection network and a changing climate with more severe and enduring weather events, we are proposing increased and ongoing investment in the region's flood protection infrastructure and river management to increase or improve community resilience.

Our 30-year Infrastructure Strategy sets out how we will manage our flood protection infrastructure and flood plains. There are immediate flood protection and river management needs to be addressed, including appropriate replacement of existing infrastructure and gravel management, while we plan and position ourselves for the transition to alternative ways of managing floodplains over the medium and longer-term.

It is not viable to keep building higher and higher stop banks. One alternative is nature-based initiatives such as wetlands for water retention, native plantings and restoring old channels. This is something we have already started to explore.

If we don't make these investments and maintain the status quo our ability to manage our flood protection infrastructure will not be as effective as it could be. As a result, the infrastructure's ability to endure the increasing severity of weather events may decline over time, increasing the risk of flooding.

Reduced investment would also limit our ability to develop our flood resilience knowledge (through modelling and other activities) and in turn affect our planning for the future. We would continue with our maintenance programme where we address the most pressing matters, and defer others, and we would not have the funding for more capital investment.

Environment Southland therefore believes it is prudent to include provision for ongoing co-investment in flood management capital works projects from year 4 of this Long-term Plan. This government funding is not confirmed however it is included to show what is required to achieve the preferred outcome and Environment Southland's contribution towards this.

Should central government funding not be available, Environment Southland would need to reassess how to proceed with its provisional capital works programme ahead of its 2027-2037 Long-term Plan noting the constraints around debt funding that currently exist. This is likely to result in a much longer-term capital works programme with the risk of underperformance of the current network and associated increased flooding risk, alongside increased maintenance requirements.

To see the **Infrastructure Strategy** visit our website www.es.govt.nz.



12:25 pm
OC
myo

⑦ Submission to Environment Southland
over proposed rates increase.

① Climate Change Strategy.

We disagree that anything needs to be done re increased rainfall events. It is simply NOT happening. In fact large flood events are fewer now than they were in decades past. I can remember 12 floods on the Mataura in 12 months about 20 years ago. There was 1 last year & 4 years ago when Wymulhem was evacuated. That's 2 events in the last 5 years. Niwa predicts 10% increase in rainfall because of climate change. They also predicted a drought in Southland this year. Yeah right! Their predictions are conjecture! Let's wait until it happens before spending millions on flood banks that probably will never be needed. We see no justification for

② The construction of new floodbanks protecting Lumsden, Winton and Waihopai as suggested by your staff at the Waimahatua meeting. Lumsden & Winton have never flooded to my knowledge & the Waihopai event in 1984 I think it was, was an exceptional event resulting from a stationary front over the area which lasted for many hours. We in Southern Southland only 60 kms away received less than 10 m.m. We agree with the gravel extraction proposals - it should never have been halted by misguided greens advocating for a 'hands off' strategy for river management. Perhaps the gravel could be ~~made~~ made available to local enterprises free or at nominal rates. Your P.R. would increase monumentally. As far as the \$2.3 million to be raised for flood protection work

③

it is simply NOT required or sustainable. Farmers & farm support industries are suffering from increased costs and decreased income to the extent that most farms are in a loss making scenario right now, especially those who have significant debt. Local body councils - it is happening nation-wide - are hell-bent on continuing on their merry way despite their ratepayers going broke.

I was staggered to hear that E/S has a staff of 160. What in hades do they all do? Instead of increasing rates you could decrease your staff by half & save maybe \$~~15~~5m p.a. People outside your organisation think you are an organisation that is overstaffed overpaid & under worked. Rightly or wrongly that is a

(4)

widely held belief.

Your staff told us at Waimihaka that an increase in staff of around 6% is required for them to do what is required of them. They are simply trying to protect their 'cushy' positions for life at someone else's expense. You are not the social welfare dept.

Indeed the govt. is winding back its impositions on the 'greenie' nonsense that was foisted upon us by the previous govt. e.g. slope restrictions are already gone & winter grazing restrictions are also going. Perhaps we don't need as many people driving & flying around trying to catch winter graziers out.

You talk about greenhouse gas emissions. What about years? How much CO₂ goes into the

⑤

atmosphere through your staff driving expensive 4WDs all round the country achieving next to nothing.

I am deeply suspicious that your staff is influencing the controllers on future policy primarily to 'protect their patch' & have a 'cushy' job for life. Perhaps I'm wrong but the controllers should set the policy, not the staff.

During these tough times we need a nil increase in rates or a decrease. If you have to trim your staff back to achieve that then so be it! I am presuming that it costs around \$100,000 to employ your staff on average, especially if you are supplying them with an expensive 4WD ute, all paid for by us. You are out of touch with your rate payer base.

⑥

② SPIES rate :

We absolutely support this targeted rate. Our rabbit numbers are at very low levels (around 0.5 McLean scale) and is one thing we like about E/S. Having a compulsory rate is the only way it will work.

③ Infrastructure Strategy,

We don't think you need to embark on new floodworks but simply maintain what you have & just see what happens. If indeed the flood events increase by the magnitude you think it will then that is the time to upgrade.

This may not meet with universal agreement by E.S. but thank you for the opportunity to express our opinion.

Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.



Yes



No

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Contact details

Name:

Russell James Cook

Organisation (if representing):

Cook Farming Co. Ltd

Organisation role:

Director

Postal address:

Craigieburn Rd Wymondham

Postcode:

9591

Email:

bscook@networld.co.nz

Phone:

052469747

Signature:

[Signature] Director Cook Farming

[Signature] B.S Cook B.Agr. Sci. Director Cook Farming

We can receive your feedback in a number of ways:



Mail

Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840



Delivery

Environment Southland
Cnr North Rd & Price St
Invercargill



Online

www.es.govt.nz



Email

consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally

① Commit an SPES + FS rates.

② Rives best in 50 yrs

Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

Do you support our preferred option
or do you have another view?

Investing in flood protection infrastructure

Due to the challenges of Southland's ageing flood protection network and a changing climate resulting in more severe and enduring weather events we are proposing increased and ongoing investment in the region's flood protection infrastructure and river management to increase community resilience.

Preferred option: Increase operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Infrastructure Rate (see Revenue and Financing Policy Statement of Proposal on Rates – www.es.govt.nz).

This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☒

Another option/view



Do you have any further feedback?

- Use \$25M reserves to do urgent work to Level 3 only.
- Replace the River Manager with somebody who actually lives in Southland
- Publish all river related reports so they can be scrutinized by the public
- Get a better understanding of the river's sediment transport and focus on key areas for gravel extraction (expedite permitting process)
- Stop using Glyphosate in riparian weed management
- Stop trying to scare the public about climate change, and focus river management on fixing current issues with flood control and water quality / biodiversity.

Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
- Infrastructure Strategy
- Significance and Engagement Policy
- Representation Review

Stop wasting the ratepayer's money on this. The majority of the people in Southland don't believe that this poses a significant threat (if any). Even if it was, it would be far beyond the competence of anyone working at council to do anything about it. Focus on real and present problems.

Please use additional paper if required.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.



Yes



No

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Contact details

Name: Josh Cumberland
Organisation (if representing): Cumberland Hydrology Ltd.
Organisation role: Water Resources Engineer
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Phone: 022 647 8164
Signature: 

We can receive your feedback in a number of ways:



Mail
Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840



Delivery
Environment Southland
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Invercargill



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www.es.govt.nz



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Richard Johnson
Chairperson
Otatara Landcare Group
Rakiura Parade
Otatara
9RD
Invercargill
Email: otataralg@gmail.com



Environment Southland
Private Bag 90116
Invercargill 9840
Email consultation@es.govt.nz

12 May 2024

Otatara Landcare Group submission to Environment Southland Long Term plan 2024-34

Thank you for the opportunity to submit to the Environment Southland (ES) Long Term Plan (LTP). The Otatara Landcare Group (OLG) is an active community group in the Otatara area. Our goal is to protect, enhance and promote our special environment. Our focus is on:

- Bushy Point Conservation Area – where we undertake restoration planting, pest control, weed control, walking track development and maintenance, education and community participation.
- Otatara Pestbusters – the Otatara Pestbusters supports community members with pest control on their own property. Also, the Otatara Pestbusters (through the OLG) undertakes pest control on five ICC reserves (Otatara Scenic Reserve, John Street Reserve, Raeburn Street Reserve, Matua Street Reserve, Bowman's Bush and the Parnell Sanctuary) and the DOC Otatara South Reserve.
- Advice to locals on the local bush and other natural values and how to manage and enhance these features.
- Advice to locals on recreational opportunities and historical features of the Otatara area.
- Advocacy regarding awareness and conservation of natural and historical features of the Otatara area.

Some scene setting

Otatara is a suburb of Invercargill, lying between the built city and Sandy Point/Oreti Beach. One notable feature of Otatara is the retention of much bush in a semi-urban/semi-rural environment. Another feature are the conspicuous native birds (especially tui, bellbirds and kereru along with kakariki and fernbirds). Otatara lies on the edge of the New River Estuary at the mouth of the Oreti and Waihopai Rivers. Activities upstream in the catchment of the Oreti and Waihopai Rivers impacts the New River Estuary. Despite the classification of the New River Estuary as a Ramsar Wetland of Regional Importance (part of the Awarua/Waituna Ramsar site), it is the most degraded estuary in

Southland. Much of Otatara is low lying with areas prone to coastal inundation from sea-level rise or tsunamis. Flooding is another threat that could isolate our community. Therefore, Climate Change issues are of concern to the OLG and our community.

Biodiversity Concerns

In some previous long term plans Biodiversity was identified as one of the big three issues for Southland. However, in the current ED LTP Biodiversity is barely mentioned. However, I am pleased to note that ES Chairman Horrell's comments in the LTP consultation document – "Our biodiversity programme which aims to protect Southland's native species and ecosystems, will continue to provide advice, support and grants to landowners and the community."

We are concerned that Biodiversity continues to be the 'poor cousin' in terms of ES priorities. We would like to see Biodiversity reinstated as one of the big three issues for ES. Biodiversity and its continued wellbeing is of huge importance to Southland for many reasons. These reasons include economic, ecological, enhanced ecosystem services and social reasons. Our Southland biodiversity and associated landscapes provide a sense of place and contributes to our regional identity and who we are as Southlanders.

Unfortunately, our special biodiversity remains under considerable pressure in Southland. The extent of our natural ecosystems is decreasing and the condition of these ecosystems is in decline. Many native species are listed as threatened and are continuing to decline in abundance and extent. The threats are many and diverse but some of the most significant threats are continuing habitat loss and degradation, pest animals, weeds, disease and climate change. We hope that ES will increase the resources put into addressing these threats during the term of the current LTP.

Otatara Landcare Group comments on flood protection infrastructure topic

We are pleased that nature-based initiatives are commented on favourably in the ES LTP discussion topic. We strongly support increased consideration of nature-based initiatives including an increased role of wetlands including wetland protection, restoration and creation and also increased native plantings, restoring old channels and other initiatives. Nature based initiatives will better account for increasing Climate Change impacts and more effectively build climate change resilience into longer term flood control infrastructure and projects.

Climate change predictions suggest more frequent and more intense flood events. Therefore, doing more of the same and in the same place will not solve the problem. Allowing more room for rivers will allow greater volumes of water to be accommodated and provide greater buffering to the waterways, while allowing other benefits, including biodiversity recovery and increased recreational use.

The OLG acknowledge that flooding impacts upon all Southlanders, despite those living next to water ways potentially being most impacted.

We seek funding to be allocated to assessment of nature-based initiatives for all the major Southland rivers. Further we seek that the first nature-based initiatives are implemented during the term of this LTP.

Key items that the Otatara Landcare Group want funded through the ES Long Term Plan

Regional Planning initiatives

Southland Land & Water Plan: The OLG is pleased that the Southland Land & Water Plan (SLWP) has finally been approved. A recent Southland Daily Times article (10/5/2024) states that both Fish and Game and Federated Farmers believe that the SLWP has been improved since originally released for

consultation. The plan approval process is reported to have taken from 2016 and cost \$6 million. It is important that this investment of time and finance is not wasted and the plan is now fully implemented.

We believe that water quality is a priority action for Southland. We are concerned at the water quality state in Southland and the declines that have occurred. Therefore, we support efforts to improve water quality.

We support current and proposed future initiatives in the Waituna Catchment, however see a need for greater action on other catchments as well. We are particularly interested in greater efforts in the Oreti River. The Oreti River is the water supply for Invercargill and so it is important to maintain both water quality and quantity. Otatara is located at the mouth of the Oreti River and on the northern shore of New River Estuary. The OLG is very concerned about the degraded state of the New River Estuary – it is the most modified and degraded estuary in Southland. The OLG would like to see:

- Increased efforts to improve water quality and quantity in the Oreti River catchment.
- Increased management and restoration efforts in the New River Estuary.
- Increased monitoring of habitat condition, water quality, sedimentation and other environmental parameters in the New River Estuary.
- Increased efforts to identify and appropriately manage all leaky soil zones on all farms.

Climate Change Policy and Planning: Climate Change will be the most significant issue affecting Southland in coming decades (and beyond). Climate change will impact all land uses in Southland. It will affect our people and our biodiversity. OLG requests that increased funding is allocated to Climate Change planning and policy. It is appropriate that ES leads regional Climate Change initiatives.

Biodiversity

Support to Environmental Action on the Ground: There are many landowners and community groups active in conservation and environmental management in Southland. These groups have been very successful and have achieved some excellent results. However, the funding requirements are ongoing. Much effort is diverted from on the ground management into fund raising, reporting and administration. The active environmental groups include Landcare Groups, Catchment Groups, Community Pest control groups (including pest and weed busters) and other community groups.

The OLG flagship project is its restoration project at Bushy Point Conservation Area in Otatara. At Bushy Point we undertake an ongoing revegetation and restoration project. This involves progressively revegetating the area and pest control over an c. 100ha area, weed control, walking track creation and maintenance; and environmental advocacy. The OLG also operates the Otatara Pestbusters which organises volunteers to undertake pest control at Otatara South Reserve, five ICC reserves (the largest being the Otatara Scenic Reserve) and supports local landowners. The OLG is also a partner/supporter of other Biodiversity initiatives including the Southland Community Nursery, Bush Haven tui and kereru rehabilitation project, the NZ Native Forest Restoration Trust's Oreti dunes totara forest reserve, Southland Ecological Restoration Network and other environmental initiatives. The OLG appreciates the funding support that it has received and seeks further support in future years.

The OLG wish to see:

- The funding available to support environmental groups increased.
- Funding for established, successful projects supporting regionally important projects. (including the OLG Bushy Point project) to be available for three-year periods.
- Increased technical support to groups.
- Increased monitoring of ecological outcomes and project effectiveness.
- Funding and other support for a Predator Free Bluff to Omaui area. Note this should be considered the first stage of a larger project that would progressively expand to 1) Sandy and Otatara and 2) Tiwai Peninsula, Waituna Wetlands and Awarua wetlands.

Environmental Enhancement Fund: This fund has already proved to be highly successful in supporting landowners and community groups and has resulted in additional areas under active management and increased protection. We are pleased that the Environmental Enhance Fund funding over recent years has increased (as has the interest for funding). The OLG wish to see:

- The existing funding increased.
- That the funding is applied more strategically and becomes more proactive.

Ecological Assessment surveys: These surveys have made an important contribution to the knowledge of Southland's remaining biodiversity. More importantly these reports provide landowners reports on what biodiversity they have, the special values and the management requirements. The OLG wish to see:

- The existing funding maintained.
- That these surveys are actively followed up with landowners to see what support is required and to assist landowners with applications for funding and protection.
- This information properly databased and able to be utilised to set regional management and protection priorities.

Funding to increase knowledge of Southland's biodiversity, its condition and trends: Southland's biodiversity remains inadequately known and appreciated. Therefore it is difficult to prioritise for management and protection. The OLG wish to see:

- Increased survey activity including increased support for ecological site surveys and regional biodiversity surveys.
- State of Environment reporting covering extent, condition and trend for Southland's ecosystems and a range of key indicator species.
- Improved ecosystem mapping (it is important to know the current and past extent of ecosystems).
- Increased monitoring of the condition and trend of biodiversity in Southland.

Wetland conservation: Wetlands are amongst Southlands and New Zealand's most reduced ecosystems. Southland is a national stronghold for wetland conservation in New Zealand. Wetlands in Southland continue to be developed, modified and degraded. Issues of particular concern are wetland loss, weed invasion and hydrological modification. The OLG wish to see:

- Increased efforts in wetland identification, advocacy and protection.
- Increased funding for wetland management particularly weed control.
- All regionally significant wetlands being actively management and monitored.
- A regional wetland monitoring programme (focussing on wetland health/condition and trends).

- A scheme to recognise landowners who are actively managing any wetland of national, regional and local importance.
- One new Ramsar Wetland of International Importance site investigated by ES during the next financial year and three new Ramsar sites proposed and investigated during the term of this plan.

ES Biodiversity Team staffing: The ES Biodiversity Team has increased in recent years. The ES Biodiversity Team has many functions including biodiversity support to landowners and community groups, preparation of site management plans, administration of the EEF and much more. The OLG support maintaining funding for the ES Biodiversity Team.

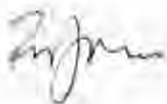
Biosecurity

Biosecurity is of huge importance to our natural environment and to the agricultural sector, and therefore to our economy. Climate Change will result in the arrival of new pests and some existing pest having increased impacts. The OLG wish to see:

- The existing Biosecurity efforts maintained and ideally increased.
- Increased funding and technical support to community groups undertaking pest animal and weed control.
- Support for the West Dome Wilding Tree Trust and other regional efforts to control wilding pines.
- Support increased funding for priority environment/conservation weeds.
- Increased efforts to eradicate recently arrived weeds and to prevent weeds from arriving in Southland. Note ES should lead this work.
- Increased efforts to control eradication species. Note ES should lead this work.
- Increased funding for wasp control. Note wasps appear to be increasing in Southland and will continue to increase through climate change.
- Production of a new Regional Pest Management Plan within the current term of the current ES LTP. WE would also like to see a greater emphasis on environmental/ecological weeds along with agricultural weeds.

We would like the opportunity to speak to our submission.

Thank you for the opportunity to submit on the ICC Long Term Plan 2024-2034 and to have a contribution to the future wellbeing of Southland's environment and its community.



Richard Johnson
Chairman
Otatara Landcare Group

Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
13th May 2024

Do you support our preferred option or do you have another view?

Investing in flood protection infrastructure

Due to the challenges of Southland's ageing flood protection network and a changing climate resulting in more severe and enduring weather events we are proposing increased and ongoing investment in the region's flood protection infrastructure and river management to increase community resilience.

Preferred option: Increase operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Infrastructure Rate (see Revenue and Financing Policy Statement of Proposal on Rates – www.es.govt.nz).

This would result in an average rates increase of \$22 a year for a Southland property valued at \$450k; \$239 for a property valued at \$5m.

☐

Preferred option

☒

Another option/view

Do you have any further feedback?

No more money should be spent on flood protection this year as ratepayers simply can't afford it. Shareholding in South Port should be retained. The targeted rabbit rate must be retained. Two independent surveys have proven overwhelmingly that the affected farmers want this. The proposed move to basing rates on capital value is wrong. All the farms in our district that have been converted to forestry have had their capital value vastly decreased. So Environment S. will collect less revenue.

When councillors hear submissions on this consultation document, do you want to present your views in person? Do you require any support to do so? Please note that all submissions are considered equally, whether or not you choose to present yours in person.

☒ Yes
☐ No

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Contact details

Name: Ken Buckingham

Organisation (if representing):

Organisation role:

Postal address: 438 Collis Road

Postcode:

Wyndham 9891

Email:

Phone:

03 2669876

Signature:

K. Buckingham

Tell us what you think

**HAVE
YOUR SAY**

By 5.00pm,
6 May 2024

Do you support our preferred option
or do you have another view?

Investing in flood protection infrastructure

Due to the challenges of Southland's ageing flood protection network and a changing climate resulting in more severe and enduring weather events we are proposing increased and ongoing investment in the region's flood protection infrastructure and river management to increase community resilience.

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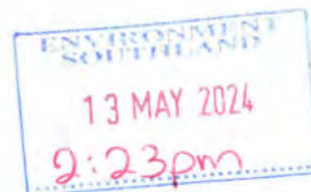
☐

Preferred option

☒

Another option/view

Do you have any further feedback?



Other feedback

Do you have feedback on the other matters raised or anything else?

- Revenue and Financing Policy
- Shareholding in South Port NZ Ltd
- Financial Strategy
- Climate change strategy
- Targeted rabbit control rate
- Fees and charges
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- Representation Review

Please use additional paper if required.

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Yes



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Contact details

Name: Chantel Marshall

Organisation (If representing): Groundswell Western Southland

Organisation role: _____

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Postcode: _____

Email: groundswellwesternsouthland@gmail.com Phone: 021 567 105

Signature: 

We can receive your feedback in a number of ways:



Mail

Freepost Authority No. 247418
Environment Southland
Private Bag 90116
Invercargill 9840



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Email

consultation@es.govt.nz

Please contact us on 03 211 5115 if you want to submit in a different way e.g. verbally

'Investing in Southland' 2024-2034 Long-term Plan Consultation Document.

- We are opposing the proposal to move rates from Land Value to Capital Value, which we see as a revenue gathering proposal only. ES do not provide services to our buildings so to be taxed on the value of our homes and buildings is not within your role. Your mission as stated on your website is "Working with our communities to improve Southland's environment". This is achievable with a realistic budget.
- A proposed increase in staff in the first year of this LTP of 7.75 at a cost of \$749k when you currently employ 194 staff plus casuals at a cost to the ratepayers of in excess of \$17000,000 must be questioned. A business analysis would soon determine where cost cutting should occur.
- Environment Southland continue to invest in modelling, consultants and scientists to do jobs that can be approached with a 'back to basics' and 'common sense', 'no frills' attitude within your department.
- We request Environment Southland delay the Draft Long-Term Plan for a period of no less than 12 months as indicated by Central Government. During this time a consent process could be completed giving people the opportunity to extract gravel from the river beds.
- Many people are under undue stress now and we are witnessing financial and mental struggles within our communities.
- Fish and Game state they want "A more holistic approach to river management". The fact that Fish and Game along with Environment Southland continue to protect the aquatic species and birds over and above human life has to be questioned.



Waimatuku May 9th 2024



Wreys Bush Bridge - 11 May 2024



Wreys Bush Bridge Looking North – 11 May 2024

Name	City	Postal Code	Country	Signed On
Chantel Marshall			New Zealand	1/05/2024
Sue Allison			New Zealand	1/05/2024
Rowena Whale			New Zealand	1/05/2024
Bruce Allison	Southland		New Zealand	1/05/2024
TERESA HARDEGGER	Isla Bank		New Zealand	1/05/2024
Loretta Hardegger	Invercargill		New Zealand	1/05/2024
Sharon McHugh	Winton		New Zealand	1/05/2024
Anna Pulley	Cromwell		New Zealand	1/05/2024
Bradley Stewart	aparima , Southland		New Zealand	1/05/2024
Alanna Barrett			New Zealand	1/05/2024
Fraser Wisely			New Zealand	1/05/2024
Braydon Symon	Auckland	1150	New Zealand	1/05/2024
Isobel Milne			New Zealand	1/05/2024
Samara Wech	Invercargill		New Zealand	1/05/2024
Bryce McKenzie	Gore		New Zealand	1/05/2024
Rob Highsted			New Zealand	1/05/2024
Lyndal Sinclair			New Zealand	1/05/2024
brian kennard	Nightcaps		New Zealand	1/05/2024
Candace Mosen			New Zealand	2/05/2024
Bruce Best			New Zealand	2/05/2024
Dale Kelly	Winton		New Zealand	2/05/2024
Marlys Smith	Queenstown		New Zealand	2/05/2024
Joan Redpath			New Zealand	2/05/2024
James McMahon	Auckland		New Zealand	2/05/2024
Aaron Baird			New Zealand	2/05/2024
Kelvin reeves			New Zealand	2/05/2024
Damian Pulley			New Zealand	2/05/2024
Russell Falconer	Gore		New Zealand	2/05/2024
Chris Bogers			New Zealand	2/05/2024
Murray Christensen	Invercargill	9810	New Zealand	2/05/2024
Ross Paterson	Gore		New Zealand	2/05/2024
Margaret Jacobsen	Te Anay		New Zealand	2/05/2024
Donna Bruce			New Zealand	2/05/2024
Peter Henderson	Invercargill	3109	New Zealand	2/05/2024
Vicky Ross	Auckland		New Zealand	2/05/2024
Toni-Ann McIntosh			New Zealand	2/05/2024
Wendy Henderson	Auckland	1150	New Zealand	2/05/2024
Tracy Allan	Gore		New Zealand	2/05/2024
Jared Fluerty	Papamoa beach		New Zealand	2/05/2024
Robyn Wisely	Gore		New Zealand	2/05/2024
Dean Stockdale	Gore		New Zealand	2/05/2024
Joshua Kingipotiki			New Zealand	2/05/2024
Melissa Wilson	Invercargill		New Zealand	2/05/2024
rewai karetai	invercargill		New Zealand	2/05/2024
Tony Smith	Invercargill	9812	New Zealand	2/05/2024
E P			New Zealand	2/05/2024
TA Sarg			New Zealand	2/05/2024
Michelle Marshall	invercargill		New Zealand	2/05/2024
Rayna Sobels	Tuatapere		New Zealand	2/05/2024

Karen Maw	Invercargill	9810 New Zealand	2/05/2024
Dave Diack		New Zealand	2/05/2024
Vicki Kelly	Gore	New Zealand	2/05/2024
Julie Walls	Te Anau	New Zealand	2/05/2024
Julie Kerr	Christchurch	8041 New Zealand	2/05/2024
Maddie Hendrie	Waitakere	600 New Zealand	2/05/2024
Hamish Rhodes	Christchurch	New Zealand	2/05/2024
Treena Symons	Christchurch	New Zealand	2/05/2024
Annie Stephens		New Zealand	2/05/2024
Colin Tapp	Invercargill	9810 New Zealand	2/05/2024
Katie Allan		New Zealand	2/05/2024
Turiana Smith	Christchurch	New Zealand	2/05/2024
Lyn Gold	Milton	New Zealand	2/05/2024
Ian Teviotdale		New Zealand	2/05/2024
Gemma Philp	Queenstown	9300 New Zealand	2/05/2024
Elizabeth Black	Roxburgh, Otago, New Zealand	New Zealand	2/05/2024
James Waddell	New Zealand	9772 New Zealand	2/05/2024
Glenda Marshall	Invercargill	9810 New Zealand	2/05/2024
Ted Boulton	Invercargill	New Zealand	2/05/2024
Phil Mitchell	Invercargill	New Zealand	2/05/2024
Kate Wilson	Queenstown	9300 New Zealand	3/05/2024
Alice Pottinger	Invercargill	New Zealand	3/05/2024
Simon Greig	Invercargill	New Zealand	3/05/2024
Ben McMaster	Christchurch	New Zealand	3/05/2024
William Payne		New Zealand	3/05/2024
Glenn Cox		New Zealand	3/05/2024
Leah Kennard	Invercargill	New Zealand	3/05/2024
Rhys Cornor	Dargaville	New Zealand	3/05/2024
Ashlee Kidd		New Zealand	3/05/2024
Connor O'Brien	Christchurch	New Zealand	3/05/2024
Matthew O'Brien	Southland	New Zealand	3/05/2024
Tash Hamilton		New Zealand	3/05/2024
Joshua Thomson	Southland	9887 New Zealand	3/05/2024
Carl Bacon		New Zealand	3/05/2024
Hayden Dore		New Zealand	3/05/2024
Ella O'Brien		New Zealand	3/05/2024
Maria Cournane	Busselton	6753 New Zealand	3/05/2024
Marion Metz		New Zealand	3/05/2024
Katie Pasini	Winton	8061 New Zealand	3/05/2024
Chloe Milne	Invercargill	New Zealand	3/05/2024
Mairi Collier	Rotorua	New Zealand	3/05/2024
Monique Fraser		New Zealand	3/05/2024
Joanne Ross	Christchurch	New Zealand	3/05/2024
Jillian Bradshaw	Bluff	New Zealand	3/05/2024
Amy Knoll	Invercargill	New Zealand	3/05/2024
Marc Knoll	Invercargill	New Zealand	3/05/2024
Carol Andrews	Auckland	New Zealand	3/05/2024
Mike Drabble		New Zealand	3/05/2024
Lyn Ward	Invercargill	9810 New Zealand	3/05/2024
Stephanie Jacobsen		New Zealand	3/05/2024

Emma Peterson	invercargill	9810 New Zealand	3/05/2024
Sandra McKenzie	Otautau	New Zealand	3/05/2024
David Craze 111	Hokitika	New Zealand	3/05/2024
Joanne Hegan		New Zealand	3/05/2024
Kristie Finnegan	Winton	New Zealand	3/05/2024
Anna List		New Zealand	3/05/2024
Geoff Scott	Auckland	New Zealand	3/05/2024
Erika Lam	te anau	New Zealand	3/05/2024
Kevin Brady	Invercargill	New Zealand	3/05/2024
Phillipa Montgomery	Wairio	New Zealand	3/05/2024
Donald James (Mack) McIntosh	Tawanui	New Zealand	3/05/2024
William Harris	Clinton	New Zealand	3/05/2024
Vanessa Morris	Papakura	New Zealand	3/05/2024
Jacqui Wilson	Christchurch	8011 New Zealand	3/05/2024
Amanda Quinn	Auckland	New Zealand	3/05/2024
Lindsay Hedges	Auckland	1010 New Zealand	3/05/2024
Mandy Horne	Southland	New Zealand	3/05/2024
Fiona Hughes		New Zealand	3/05/2024
Jen Harvey	Invercargill	9810 New Zealand	3/05/2024
Rebecca Gaudie	Edendale	New Zealand	3/05/2024
Kirsty Surynt		New Zealand	3/05/2024
Harris Michelle		New Zealand	3/05/2024
Laurie Paterson	Gore	New Zealand	4/05/2024
Keith Muir		New Zealand	4/05/2024
Gail Gahan	Invercargill	New Zealand	4/05/2024
Margaret Herud	Winton	New Zealand	4/05/2024
Judy Ridley		New Zealand	4/05/2024
kat hartley	kaikoura	New Zealand	4/05/2024
Leila Waenga	Lower hutt	7300 New Zealand	4/05/2024
Malcolm. King		New Zealand	4/05/2024
Amber Kohunui	Auckland	New Zealand	4/05/2024
Dee Price		1010 New Zealand	4/05/2024
Joanne Crackers		New Zealand	4/05/2024
Tinneke Staut		New Zealand	4/05/2024
Jackie McIntyre	Invercargill	New Zealand	4/05/2024
Sandra Carmichael	Winton	New Zealand	4/05/2024
ANNETTE GUNTHER	INVERCARGILL	New Zealand	5/05/2024
Sivamsingh Singh	Auckland	9874 New Zealand	5/05/2024
Jerry Schuurmans	Invercargill	New Zealand	5/05/2024
Carl Mccrostie		New Zealand	5/05/2024
Rhonda Haugh	West Otago	New Zealand	5/05/2024
Jenna Orpwood	Gore	New Zealand	5/05/2024
Shay de Groot	Invercargill	9740 New Zealand	5/05/2024
Panha Chum	Copenhagen	New Zealand	5/05/2024
Tina McLardy		New Zealand	5/05/2024
kerri scott	christchurch	New Zealand	5/05/2024
bill clouston	Featherston	8025 New Zealand	5/05/2024
Ge Dee		New Zealand	5/05/2024
Dan Kyle	Invercargill	New Zealand	5/05/2024
David McInnes	Clinton	9810 New Zealand	5/05/2024
		New Zealand	5/05/2024

Michael Blomfield	Riverton	CA11	New Zealand	5/05/2024
Anna Smith	Te Anau		New Zealand	5/05/2024
Bev Hagen	Wanaka		New Zealand	6/05/2024
Trevor Wilson	Clinton		New Zealand	6/05/2024
Nancy Barnes	Southland		New Zealand	6/05/2024
L Stewart			New Zealand	6/05/2024
Danni Jennings	Invercargill		New Zealand	6/05/2024
Dale Wairau			New Zealand	6/05/2024
foottickler ohio			New Zealand	6/05/2024
Teresa Macdonald	Invercargill		New Zealand	6/05/2024
Barbara Avery			New Zealand	6/05/2024
Tracy Mulgrew	Invercargill	9810	New Zealand	6/05/2024
Savannah schaap			New Zealand	6/05/2024
Michael Lane	Invercargill, Southland, New Zealand		New Zealand	6/05/2024
Darrin Crack			New Zealand	6/05/2024
Mel Butler	winton		New Zealand	6/05/2024
Barbara McFarlane			New Zealand	7/05/2024
Marlene Parkinson			New Zealand	7/05/2024
Melanie Jones	Invercargill		New Zealand	7/05/2024
Hinewai Tait			New Zealand	7/05/2024
Lucy Collings	Invercargill, Southland, New Zealand		New Zealand	7/05/2024
Rory Watt		6450	New Zealand	7/05/2024
David Lindsay			New Zealand	7/05/2024
Phil Barrett			New Zealand	7/05/2024
Stuart James	Invercargill	9810	New Zealand	7/05/2024
Paul Dawson	Invercargill		New Zealand	7/05/2024
Tammy Walker	Invercargill	95134	New Zealand	7/05/2024
Alexander Rae	Riverton	6390	New Zealand	7/05/2024
Regan Taylor	Geraldine		New Zealand	7/05/2024
Douglas Agnew	Invercargill		New Zealand	7/05/2024
Murray Woods	Napier	4144	New Zealand	8/05/2024
Blair Stewart	Gore	9710	New Zealand	8/05/2024
p;kmev kihvb	Auckland	1150	New Zealand	8/05/2024
Julie Quinn	Otautau	9610	New Zealand	8/05/2024
Chance Carran	Otautau		New Zealand	8/05/2024
Oscar Paull	Auckland	1010	New Zealand	8/05/2024
Sonya Herbert	Christchurch		New Zealand	8/05/2024
Cathy Waghorn	Invercargill		New Zealand	8/05/2024
Marj Baker	Winton	9720	New Zealand	8/05/2024
Pauline Sigurgeirson	Salt Spring Island	V8K1K6	New Zealand	8/05/2024
Jill Munro	Christchurch		New Zealand	9/05/2024
Melody Tiera			New Zealand	9/05/2024
Pamela Quirke	Invercargill		New Zealand	9/05/2024
Kristina Scott			New Zealand	9/05/2024
Kristina Scott	Invercargill		New Zealand	9/05/2024
Jeffrey Keast			New Zealand	9/05/2024
Andrew Scott			New Zealand	9/05/2024
Graeme Dodd	Invercargill		New Zealand	9/05/2024
Desiree Fielder	GEORGE TOWN	7253	Australia	10/05/2024
Talei Watson			New Zealand	10/05/2024

joshua darrah
Katie McCrostie
Shannon Blackie
Sheree Stables
Glen Jelley
dylan oboyle
Gaylene Shannon
Wayne Taylor
qwert yuiop

Whangarei
Invercargill
Otautau

Clinton

149 New Zealand 10/05/2024
New Zealand 11/05/2024
New Zealand 11/05/2024
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New Zealand 12/05/2024

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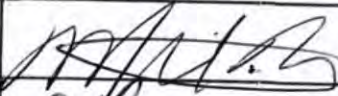
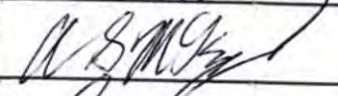
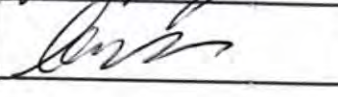
Tracy Mulgrew	Invercargill		9810	New Zealand	6/05/2024	"I don't agree with the proposed exorbitant rate increases"
Phil Barrett				New Zealand	7/05/2024	"People are being hit from all sides by faceless machines all wanting money to continue doing whatever they like . It is time for restraint and financial stewardship , not endless unaffordable rate increases."
Tammy Walker	Invercargill		95134	New Zealand	7/05/2024	"We just had a rate increase a year or two ago that doubled our rates. There is no way the government deserves more of our hard earned money. This is theft and it needs to stop."
Julie Quinn	Otautau		9610	New Zealand	8/05/2024	"The rates are already too expensive. I wouldn't be able to afford yet another price hike. And for what? Helicopter flights over farms to check on winter grazing!"
Desiree Fielder	GEORGE TOWN		7253	Australia	10/05/2024	"My husband Steve and me both sign...it's a money profiteering adventure assumed by the called corporation Environmental Southland Regional Council."
Talei Watson				New Zealand	10/05/2024	"Paying Rates is a rort. I do not have a contract with Environment Southland & decline any future offer of contract."

Name	City	State	Postal Code	Country	Date	Comment
brian kennard	Auckland			New Zealand	1/05/2024	"First and foremost why are we not notified by mail as a lot of us older rate payers don't have computers ect times are tough and elderly simply can't afford increases"
Jared Fluerty	Papamoa beach			New Zealand	2/05/2024	"It's ridiculous"
Dean Stockdale	Gore			New Zealand	2/05/2024	"We are being taxed and rated into poverty. No one is getting wage rises to cover the proposed rate rises. And as Chantel wrote -clear out the main channels of the rivers of the gravel that is choking them. Building ever higher stop banks to contain the rivers will result in the river beds rising. Our alluvial rivers have in the past filled with gravel until they reach the point of cutting out new courses to flow."
Michelle Marshall	invercargill			New Zealand	2/05/2024	"Environment southland should be abolished, then are totally unnecessary!"
Katie Allan				New Zealand	2/05/2024	"NO - we are not giving you money to control the weather."
Lyn Gold	Milton			New Zealand	2/05/2024	"Pay enough already"
Donald James (Mack) McIntosh	Tawanui			New Zealand	3/05/2024	"Because all councils must find better fairer ways to seek funding and they must show a commitment to always seeking cost effectiveness /cost savings DJM Mack"
ANNETTE GUNTHER	INVERCARGILL		9874	New Zealand	5/05/2024	"Rates keep going up and it seems so do staff and ute numbers at Environment Southland. I see little for my rates in Invercargill city"
Geoff The Bee Man Scott	Auckland			New Zealand	5/05/2024	"I am signing this for several reasons. 1 ES has failed to notify all stakeholder/ratepayers as stated in the public consultation Act 2002 2 The change to capital value will effectively rate people off their properties 3 ES have publicly admitted they want to spend huge amounts of ratepayers money on new modelling which is all flawed data 4 Reduce unesacry spending and stupid consultation processes and get back to common sense governance 5 Stop all this fear driven climate crisis. Its fear based lies based on failed modelling and science"

29-Apr-24

GROUNDSWELL WESTERN SOUTHLAND PETITION TO ENVIRONMENT SOUTHLAND

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Marcy McCullough	7 Dover St. West, Orepuki		ES DIRECTLY ☐ OTHER ☒
Dave Bourne	15 Dudley St Orepuki		ES DIRECTLY ☐ OTHER ☒
Christine Cameron	227 Pahia Round Hill Road, Pahia	CMCameron.	ES DIRECTLY ☐ OTHER ☒
Murray Dowling	PO Box 11 Kuatapene	M2Dowling	ES DIRECTLY ☐ OTHER ☒
Alan McKay	752 Ward Rd		ES DIRECTLY ☐ OTHER ☒
COLIN BRAMMER	47 STAFFORD ST OREPURI		ES DIRECTLY ☐ OTHER ☒

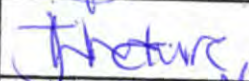
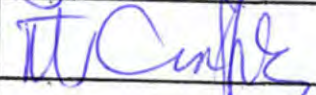
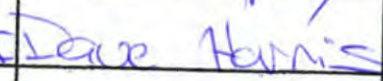
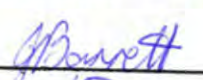
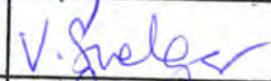
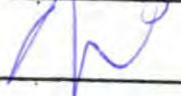
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Neville Ferguson	Corinaandneve@outlook.com	N. Ferguson	ES DIRECTLY ☐ OTHER ☒
Corina Munro	" " "	Corina Munro	ES DIRECTLY ☐ OTHER ☒
Warren Walker	kaspas@gmail.com	Warren Walker	ES DIRECTLY ☒ OTHER ☐
BARB Walker	barbaraam.christian@gmail.com	Barb Walker	ES DIRECTLY ☐ OTHER ☒
Archie Mason	archie.mason@yahoo.com	Archie Mason	ES DIRECTLY ☐ OTHER ☒
Stop contracting with them	Stop contracting with them	Zane Barnett	ES DIRECTLY ☐ OTHER ☒
Diane TePaki	DTePaki@gmail.com	Diane TePaki	ES DIRECTLY ☐ OTHER ☒
Jim Keary	Keary construction ltd	Jim Keary	ES DIRECTLY ☐ OTHER ☒
Alastair McC	@gmail.com	gkese	ES DIRECTLY ☐ OTHER ☒
Alastair McC	Orepuki Pub, Main St, Orepuki	Alastair McC	ES DIRECTLY ☐ OTHER ☒
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29-Apr-24

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Janeane McDonald	3 main st Otautau	J McDonald	ES DIRECTLY ☐ OTHER ☒
Jen McDonald	44 King st Otautau	J McDonald	ES DIRECTLY ☐ OTHER ☒
Aimee Tyler	117 Knutsford Otautau	A Tyler	ES DIRECTLY ☐ OTHER ☒
Amanda Edge	314 Otautau Drummond Rd Otautau	A Edge	ES DIRECTLY ☐ OTHER ☒
Jenny Paterson	410 lower salks gap rd	J Paterson	ES DIRECTLY ☐ OTHER ☒
Bruce Paterson	410 lower Salks gap rd	B Paterson	ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
DAN CLARK	81 MAIN ST, WAIRIO		ES DIRECTLY ☐ OTHER ☒
Jesse Wheture	1 Wampway St, Nightcaps		ES DIRECTLY ☐ OTHER ☐
Mel Griffiths	5 Annan St Nightcaps		ES DIRECTLY ☒ OTHER ☐
Sallie Harris	113 Birchwood Road CHAI		ES DIRECTLY ☐ OTHER ☒
Judith Barrett	15 Johnston Road Nightcaps		ES DIRECTLY ☐ OTHER ☒
K Day	62 Hastings Street CHAI		ES DIRECTLY ☐ OTHER ☒
Tanie Wilson	26 Kirkland St CHAI		ES DIRECTLY ☐ OTHER ☒
William Wilson	26 Kirkland St CHAI		ES DIRECTLY ☐ OTHER ☒
Vanessa Snelgar	5 Lyne St Nightcaps		ES DIRECTLY ☐ OTHER ☒
Steve Moor	2 Findlay Rd		ES DIRECTLY ☐ OTHER ☒
Kevin Watson	36 JOHNSTON RD N-CAPS		ES DIRECTLY ☐ OTHER ☐
			ES DIRECTLY ☐ OTHER ☐
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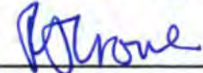
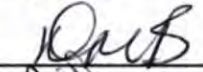
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Diana Robinson	chapchapdesign@gmail.com	<i>[Signature]</i>	ES DIRECTLY ☐ OTHER ☒
Wendy Molloy	wendy.molloy@mastercraft.co.nz	<i>[Signature]</i>	ES DIRECTLY ☐ OTHER ☒
Leanne McMaster	glcmaster@xtva.co.nz	<i>[Signature]</i>	ES DIRECTLY ☐ OTHER ☒
Lynette Martin	lynussmartin@gmail.com	<i>[Signature]</i>	ES DIRECTLY ☐ OTHER ☒
Sarah Iddles	sn-johnson@hotmail.com	<i>[Signature]</i>	ES DIRECTLY ☐ OTHER ☒
Megs Mitchell	megsardbert@kinet.co.nz	<i>[Signature]</i>	ES DIRECTLY ☐ OTHER ☒

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
RS Short	rsshort@wnation.net.nz		ES DIRECTLY ☐ OTHER ☒
TC Newell	tceady@gmail.com		ES DIRECTLY ☐ OTHER ☒
Lm Rabbitt	al.leanne@stra.co.nz		ES DIRECTLY ☐ OTHER ☒
Rachael Crowe	rachcrowe1@hotmail.com		ES DIRECTLY ☐ OTHER ☒
Norris Beck	34 Church st Winton		ES DIRECTLY ☐ OTHER ☒
Andrew Joyce	64 Scandrett St Gail		ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Debbie McDougall	dodgeybaz@gmail.com	<i>Debbie McDougall</i>	ES DIRECTLY ☐ OTHER ☒
Helen Brown	hbrown80@gmail.com	<i>Helen Brown</i>	ES DIRECTLY ☐ OTHER ☒
Mary White	mwhite@xtra.co.nz	<i>Mary White</i>	ES DIRECTLY ☐ OTHER ☒
Neal Forsyth	nealforsyth@gmail.com	<i>Neal Forsyth</i>	ES DIRECTLY ☐ OTHER ☒
Alison McDonald	74 Welsh Rd.	<i>Alison McDonald</i>	ES DIRECTLY ☐ OTHER ☒
Lawrence Brock-Smith	23 Anne St Winton	<i>Lawrence Brock-Smith</i>	ES DIRECTLY ☐ OTHER ☒
Ruby Woodgate	23 Anne St Winton	<i>Ruby Woodgate</i>	ES DIRECTLY ☐ OTHER ☒
Philippa Farland	385 Norman Rd Winton	<i>Philippa Farland</i>	ES DIRECTLY ☐ OTHER ☒
Lynley Morrison	30 McWilliam Ave Winton	<i>Lynley Morrison</i>	ES DIRECTLY ☐ OTHER ☐
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GROUNDWELL WESTERN SOUTHLAND

PETITION TO ENVIRONMENT SOUTHLAND

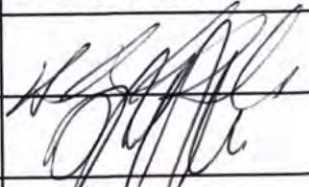
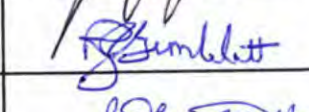
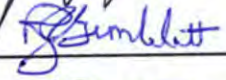
Environment Southland are changing their rating system from Land Value to Capital Value to pay for their LTP proposal. We as the community of Southland are requesting that the current Draft Long Term Plan proposed by Environment Southland be delayed for a period of no less than 12 months from this date being 29 April 2024. In these economic times the consequences of your proposal is not viable and have left many in the community concerned mentally and financially. We believe there are more economical, practical solutions to mitigate flooding in Southland. We ask that Environment Southland listen to the people within our region. We have the knowledge of the people who built the original flood protection and have been living alongside these rivers for generations. They know the rivers better than outside consultants. We request Environment Southland stop investing in modelling, consultants and scientists and go back to basics. Remove the gravel from the rivers!

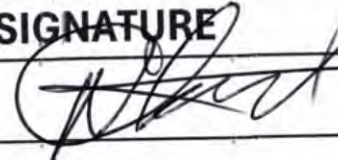
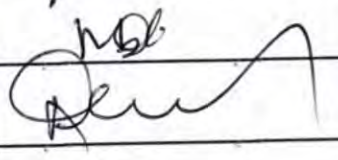
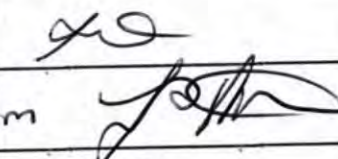
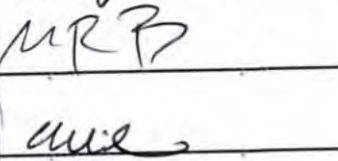
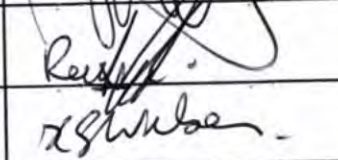
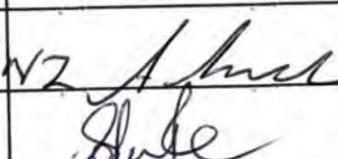
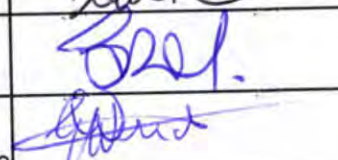
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Ben Hardegger	BenHardegger@gmail.com		ES DIRECTLY ☐ OTHER ☒
			ES DIRECTLY ☐ OTHER ☐
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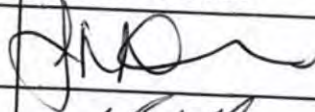
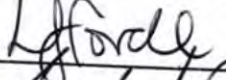
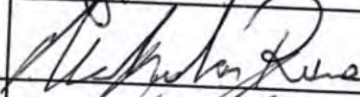
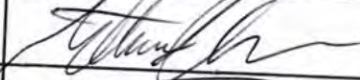
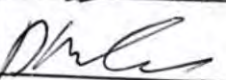
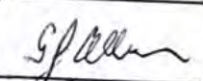
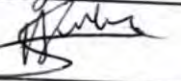
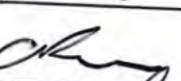
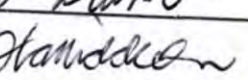
GROUNDSWELL WESTERN SOUTHLAND PETITION TO ENVIRONMENT SOUTHLAND

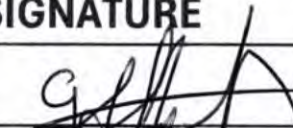
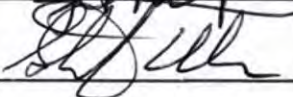
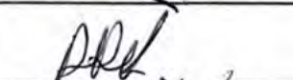
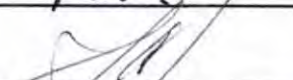
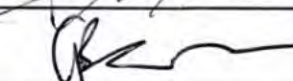
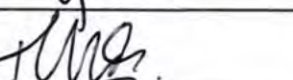
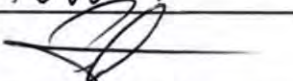
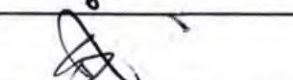
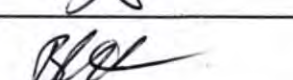
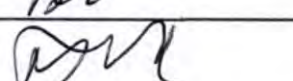
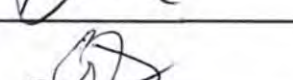
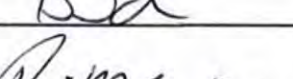
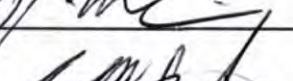
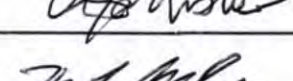
29-Apr-24

We as the community of Southland are requesting that the current Draft Long Term Plan proposed by Environment Southland be delayed for a period of no less than 12 months from this date being 29 April 2024. In these economic times the consequences of your proposal is not viable and have left many in the community concerned mentally and financially. We believe there are more economical, practical solutions to mitigate flooding in Southland. We ask that Environment Southland listen to the people within their region. We have the knowledge of the people who built the original flood protection and have been living alongside these rivers for generations. They know the rivers better than outside consultants. We request Environment Southland stop investing in modelling, consultants and scientists and go back to basics. Remove the gravel from the rivers!

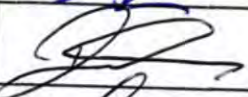
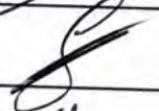
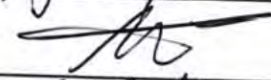
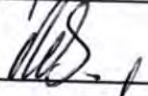
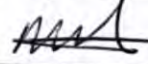
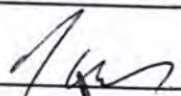
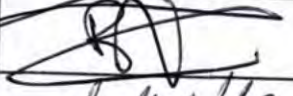
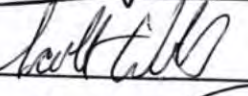
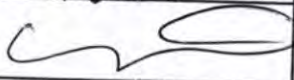
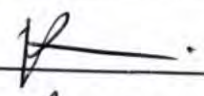
NAME	EMAIL OR STREET ADDRESS	PHONE NUMBER	SIGNATURE
Belinda Gimblett	belinda@gnail.com	021895026	
Charlie Gimblett	charlogimblett@gmail.com	021895026	
RODGER GIMBLETT	754 SLAOFIELD Rd, RD3, OTAUTAU 9683	032258294	
JUDITH GIMBLETT	r.j.gimblett@gmail.com	0211169996	
Helen Ford	helen.edginton@hotmail.com	0277496645	
Sarah O'Connell	spunkett96@hotmail.com	0277680649	

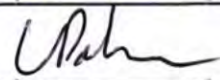
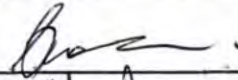
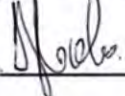
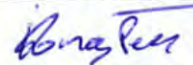
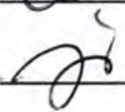
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Neel Chand	B7, General Road, Munn		ES DIRECTLY ☐ OTHER ☒
MAMTA Chand	111		ES DIRECTLY ☐ OTHER ☐
Anup Singh	111		ES DIRECTLY ☐ OTHER ☒
Shayn Wilson	cery.shayn.wilson@gmail.com		ES DIRECTLY ☒ OTHER ☒
Terralee Murphy	southern cows 181@gmail.com		ES DIRECTLY ☒ OTHER ☐
Kieren Bales	Kieren Bales xho		ES DIRECTLY ☒ OTHER ☒
Chris Wilson	chris.terae@gmail.com		ES DIRECTLY ☒ OTHER ☒
Bal Krishna Ayya	aryab712@gmail.com		ES DIRECTLY ☒ OTHER ☐
Chandra Tamang	cbtmg41@gmail.com		ES DIRECTLY ☐ OTHER ☒
Indra Sunar	ghataneindra@yahoo.com		ES DIRECTLY ☐ OTHER ☒
JUD P OLIVEROS	4796 Riverside Road		ES DIRECTLY ☐ OTHER ☐
Rueda Aragon	82 pike Road		ES DIRECTLY ☐ OTHER ☒
Kerry Wilson	kerry.shayn.wilson@gmail.com		ES DIRECTLY ☐ OTHER ☒
Alan Maxwell	alan@grasslands.org.nz		ES DIRECTLY ☐ OTHER ☒
Steph de Alessis	mosafaring05@gmail.com		ES DIRECTLY ☐ OTHER ☒
Sunita McErath	sunita@vetsouth.co.nz		ES DIRECTLY ☐ OTHER ☒
Georgette Wunda	georgette.w@vetsouth.co.nz		ES DIRECTLY ☐ OTHER ☒

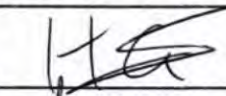
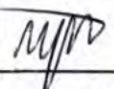
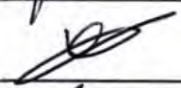
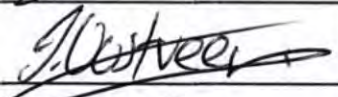
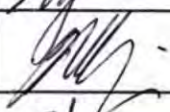
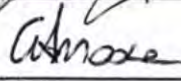
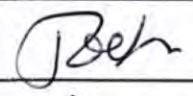
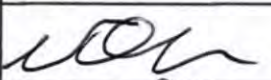
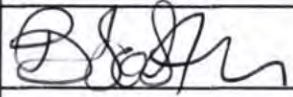
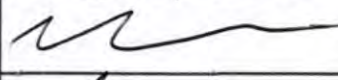
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Tanya Dickson	-		ES DIRECTLY ☐ OTHER ☒
Natasha Hull	-		ES DIRECTLY ☐ OTHER ☒
Louise Ford			ES DIRECTLY ☐ OTHER ☐
Nicholas Rowe			ES DIRECTLY ☐ OTHER ☐
Adam Carr			ES DIRECTLY ☐ OTHER ☒
Math Becken			ES DIRECTLY ☐ OTHER ☐
Elliot Wilson			ES DIRECTLY ☐ OTHER ☒
Shane Young			ES DIRECTLY ☐ OTHER ☒
Narel Bechingsale			ES DIRECTLY ☐ OTHER ☐
Graeme Allison			ES DIRECTLY ☐ OTHER ☒
Saga Ambre			ES DIRECTLY ☐ OTHER ☒
Omer Ali			ES DIRECTLY ☐ OTHER ☒
Clare Rhin			ES DIRECTLY ☐ OTHER ☐
Phoebe Carter			ES DIRECTLY ☐ OTHER ☒
Ant Shaw			ES DIRECTLY ☐ OTHER ☒
Brent Johnstone			ES DIRECTLY ☐ OTHER ☒
Hamish Middleton			ES DIRECTLY ☐ OTHER ☒

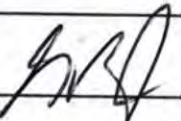
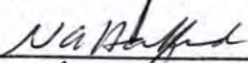
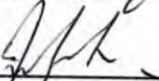
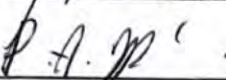
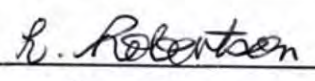
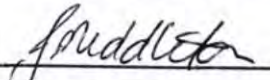
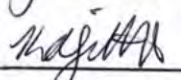
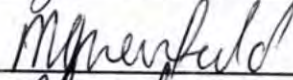
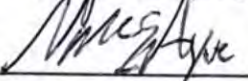
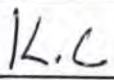
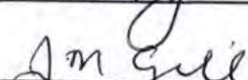
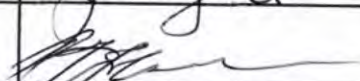
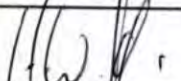
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
George Duffy	1 Anne st Winton		ES DIRECTLY ☐ OTHER ☒
Stephen Unruh	6 Howard st Gores		ES DIRECTLY ☐ OTHER ☒
Morgan Riorden	Morganriorden124@gmail.com		ES DIRECTLY ☐ OTHER ☒
Ray Kidd	2 ANNE ST WINTON		ES DIRECTLY ☐ OTHER ☐
Steve W. Cairns	21 Keven Rd R.D.4 Pokokai		ES DIRECTLY ☐ OTHER ☐
Goff Clark	12 Clark Road, R.D.2 Winton		ES DIRECTLY ☐ OTHER ☐
Thomas Clark	12 Clark Road, R.D.2 Winton		ES DIRECTLY ☐ OTHER ☒
Paul Cochran	256 Lindsay-Calcum Road 3R Pokokai		ES DIRECTLY ☐ OTHER ☒
Brian Rule	186 DRYSDALE RD		ES DIRECTLY ☐ OTHER ☐
Ben Swift	23C Hodges Drive Winton R.D.2		ES DIRECTLY ☐ OTHER ☒
Nathan Milne	426 Mayfield Road Haddon Bush		ES DIRECTLY ☐ OTHER ☒
George Deery	Hamilton rd		ES DIRECTLY ☐ OTHER ☒
Bradley deek	25 Park St Winton		ES DIRECTLY ☐ OTHER ☒
John Magrinn	59 Park St Winton		ES DIRECTLY ☐ OTHER ☒
Colin Hunt	57 PARK ST WINTON		ES DIRECTLY ☐ OTHER ☒
Andrew Johnston	15 Prince St Winton		ES DIRECTLY ☐ OTHER ☒
Ken Gough	251 Riverside Road		ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Ewan Diack	230 Durham St	E Diack	ES DIRECTLY ☐ OTHER ☐
Ben Hunt	547 Birchwood Wairio Road	Ben Hunt	ES DIRECTLY ☐ OTHER ☐
Vince Cowdreyhark	44 Park Street, Winton	Vince Cowdreyhark	ES DIRECTLY ☐ OTHER ☐
Rakana Farr	1003 Waikouwa Wairio Road	Rakana Farr	ES DIRECTLY ☐ OTHER ☐
Mike Dickey	28 MacKenzie street	Mike Dickey	ES DIRECTLY ☐ OTHER ☐
David Drake	94 Park. st Winton	David Drake	ES DIRECTLY ☐ OTHER ☐
Jim Driscoll	226 Norman Road Winton	Jim Driscoll	ES DIRECTLY ☐ OTHER ☐
Mark McMurran	536 BAWFORD Road Winton	Mark McMurran	ES DIRECTLY ☐ OTHER ☐
Murray Wright	50 Moore Rd Inghill	Murray Wright	ES DIRECTLY ☐ OTHER ☐
Gary Teruit	539 Mataura Island Fortrose (121)	Gary Teruit	ES DIRECTLY ☐ OTHER ☐
Shane Murphy	3 RD Winton	Shane Murphy	ES DIRECTLY ☐ OTHER ☐
T Sinclair	188 Craig Fortrose Rd	T Sinclair	ES DIRECTLY ☐ OTHER ☒
John Hickman	112 Ormond Over Rd	John Hickman	ES DIRECTLY ☐ OTHER ☐
Tony Hartley	637 Ryan Rd.	Tony Hartley	ES DIRECTLY ☐ OTHER ☐
Kevin Coors	1685 OTAWAY NIGHTCAPS	Kevin Coors	ES DIRECTLY ☐ OTHER ☐
Darryl Deane	20 Forsyth Road Owhiro	Darryl Deane	ES DIRECTLY ☐ OTHER ☐
Tim Clark	90 Hall Rd Heddon Bush	Tim Clark	ES DIRECTLY ☐ OTHER ☐

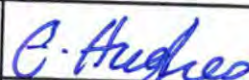
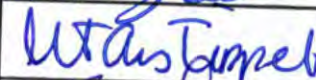
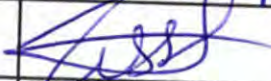
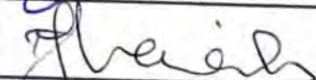
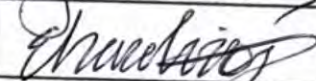
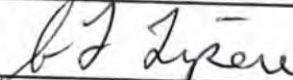
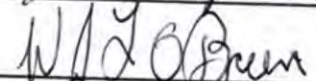
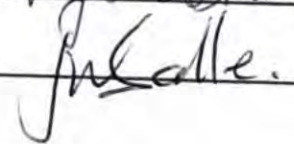
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Brad Lindsey	arhee farming@outlook.com	BD	ES DIRECTLY ☐ OTHER ☒
Daniel Muir	Muir Dairy@hotmail.com		ES DIRECTLY ☐ OTHER ☒
Eugene de la Haza	eugenedehaze@gmail.com		ES DIRECTLY ☐ OTHER ☐
Norm Hazenbury	norm@outlook.co.nz	N Hazenbury	ES DIRECTLY ☐ OTHER ☒
HARLEY CHURSTAIN	Office@Burnley.co.nz		ES DIRECTLY ☐ OTHER ☒
Rory Gentle	Georgie@Day.comail.co.NZ	Rp Gentle	ES DIRECTLY ☐ OTHER ☐
Rory Saunders	Saunders1000@gmail.com		ES DIRECTLY ☐ OTHER ☒
Martin Preston	mpresto@hotmail.co.nz		ES DIRECTLY ☐ OTHER ☒
Jess Harper	Jess Leanne@Farmside.c		ES DIRECTLY ☐ OTHER ☐
Simon Kane	simonkane05@gmail.com		ES DIRECTLY ☐ OTHER ☒
Brad Anderson	hydelandscaping1@gmail.com		ES DIRECTLY ☐ OTHER ☒
Scott Wills	scottwills1972@gmail.com		ES DIRECTLY ☐ OTHER ☐
Steven Wilson	wilson-group24@gmail.com		ES DIRECTLY ☐ OTHER ☐
Blair Smith	newhavenfarmsandspead.net.nz	B Smith	ES DIRECTLY ☐ OTHER ☒
MARTIN LEW	MARTIN HSV@HOTMAIL.CO		ES DIRECTLY ☐ OTHER ☒
Paul Hicks	Paul xrb@hotmail.com		ES DIRECTLY ☐ OTHER ☐
Richard McPherson	rmcpherson@gmail.com	Rm	ES DIRECTLY ☐ OTHER ☒

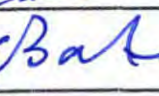
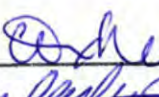
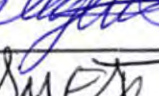
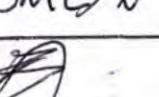
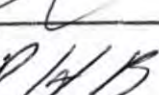
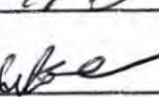
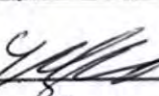
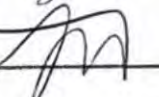
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Kim Zwagerman	Kimberly Zwagerman@gmail.com		ES DIRECTLY ☒ OTHER ☐
Tania McKenzie	tanzgrant@gmail.com	TMK	ES DIRECTLY ☒ OTHER ☐
Lauren Polmear	lauren.ryder@gmail.com		ES DIRECTLY ☒ OTHER ☐
Carrie Prosser	cazarane@yahoo.co.nz		ES DIRECTLY ☒ OTHER ☐
Tania Colas	17omatane@gmail.com		ES DIRECTLY ☒ OTHER ☐
Dave Lewis	74, MARSON RD, DRUMMOND		ES DIRECTLY ☒ OTHER ☐
Tom Pears	tom.pears@xtra.co.nz		ES DIRECTLY ☐ OTHER ☒
Hamish Montgomery	cleardrainsouth@gmail.com	HAM	ES DIRECTLY ☒ OTHER ☐
HEAN GLISS	sandraanddean@slingshot.co.nz		ES DIRECTLY ☒ OTHER ☐
Richard Alliman	1003 Otterton Drummond RD		ES DIRECTLY ☐ OTHER ☒
BRUCE ALLISON	bruce.allison@xtra.co.nz		ES DIRECTLY ☒ OTHER ☐
TOTTIE ALLINGHAM	c.allingham040597@gmail.com	C. Allingham	ES DIRECTLY ☐ OTHER ☒
Nicole Coulter	nicolehamish2015@gmail.com		ES DIRECTLY ☒ OTHER ☐
Kate Severn	tkfarming@outlook.com		ES DIRECTLY ☐ OTHER ☒
Tom Severn	il		ES DIRECTLY ☐ OTHER ☒
MARNEE RASMAN	marnee_rasman@yahoo.com		ES DIRECTLY ☐ OTHER ☐
			ES DIRECTLY ☐ OTHER ☒

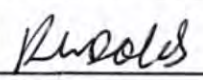
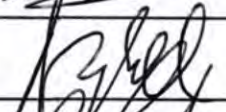
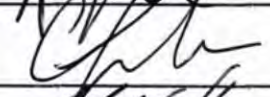
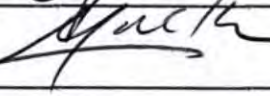
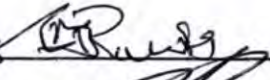
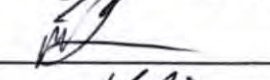
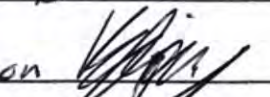
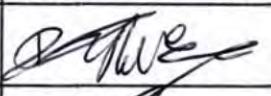
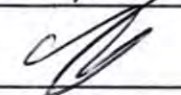
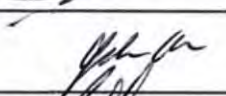
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Hunter Glover	Hunter@saicloud.com		ES DIRECTLY ☐ OTHER ☒
Angus O'Donnell	angus08256@live.com		ES DIRECTLY ☐ OTHER ☒
Kyle Olsen	Munro Road	K Olson	ES DIRECTLY ☐ OTHER ☒
Nicol Kean	NicolKean@outlook.com		ES DIRECTLY ☒ OTHER ☐
Matt Adams	matt@brightview.co.nz		ES DIRECTLY ☒ OTHER ☒
Justin Oostveen	justinoostveenfarm@gmail.com		ES DIRECTLY ☒ OTHER ☐
Keira Stevens	Kstevens322@live.com		ES DIRECTLY ☐ OTHER ☒
Mitch McGarrachan	the-hunter71@hotmail.com		ES DIRECTLY ☒ OTHER ☐
Murray McGarrachan	60 Queenst Winton.		ES DIRECTLY ☒ OTHER ☐
Brake Wilson	189 Avondale Road		ES DIRECTLY ☐ OTHER ☒
Grant Moore	grantmoore08@hotmail.com		ES DIRECTLY ☒ OTHER ☐
Jack Ashbird	1859 Dinton Winton Highway		ES DIRECTLY ☐ OTHER ☒
Matt Sloane	440 Otahutu Road		ES DIRECTLY ☐ OTHER ☒
Nathan Kean	77 Albert St Winton		ES DIRECTLY ☐ OTHER ☒
Brittney Johnston	28 Park Street Winton		ES DIRECTLY ☐ OTHER ☒
Natalie Langford	57 Meldrum St Winton		ES DIRECTLY ☐ OTHER ☒
John Riordan	Winfield Farm 08 @ gmail		ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Shayna Stirling	27 Arthur St Winton		ES DIRECTLY ☐ OTHER ☒
GREG BOYLE	80c Black Rd Otago		ES DIRECTLY ☐ OTHER ☒
Val Halford	J. Halford		ES DIRECTLY ☐ OTHER ☒
Joy Coolz.	23 Mary St Winton		ES DIRECTLY ☐ OTHER ☒
Trish McKenzie	234 Park St		ES DIRECTLY ☐ OTHER ☐
Lesley Robertson	54 Meldrum St		ES DIRECTLY ☐ OTHER ☒
J Middleton	33 Queen St		ES DIRECTLY ☐ OTHER ☐
K. Gilbert	66 de laune Rd.		ES DIRECTLY ☐ OTHER ☒
M. Greenfield	72 Meldrum St		ES DIRECTLY ☐ OTHER ☒
N M Zhye	²⁵⁸⁶ 2856 Mavora Lakes Road		ES DIRECTLY ☐ OTHER ☒
Ross Laverock	316 Marshall Rd. Northope		ES DIRECTLY ☐ OTHER ☒
Koby Cuthbertson	72 Meldrum St		ES DIRECTLY ☐ OTHER ☒
MR Yiu	63 Northview Ave Winton		ES DIRECTLY ☐ OTHER ☒
J m Guil	65 Welsh Rd Winton		ES DIRECTLY ☐ OTHER ☒
R Wilson	71 Welsh Rd Winton		ES DIRECTLY ☐ OTHER ☒
	276 Colad St Otago		ES DIRECTLY ☐ OTHER ☒
H.W.	haudenhglover@gmail.com		ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Alister Smith	1941 St Owen St	[Signature]	ES DIRECTLY ☐ OTHER ☒
DAVID FLETCHER	d1fletcher@xtre.co.nz	[Signature]	ES DIRECTLY ☐ OTHER ☒
Ian Van Dam	8 Rowley Rd Tutue	[Signature]	ES DIRECTLY ☐ OTHER ☒
Kirsten Deveny	2201 Otautau Tutapere	[Signature]	ES DIRECTLY ☐ OTHER ☒
James Garthwaite	2 McFeely St Tutapere	[Signature]	ES DIRECTLY ☐ OTHER ☒
Chris A Bogers	1191 Otautau Tutapere Rd	[Signature]	ES DIRECTLY ☐ OTHER ☒
Lindsay Wallis	33 Main Rd. Tutapere	[Signature]	ES DIRECTLY ☐ OTHER ☒
Jaspreet Boparai	193 Jenkins Road, Tutapere	[Signature]	ES DIRECTLY ☐ OTHER ☒
Diana [Signature]	1301 Winter Wreys Bush Highway	[Signature]	ES DIRECTLY ☐ OTHER ☒
Heather Carr	332 Papatotara Road Tutapere	H.M. Carr	ES DIRECTLY ☐ OTHER ☒
Rachel Diach	2 Irving St Gore	[Signature]	ES DIRECTLY ☐ OTHER ☒
Alister Diach	" " "	[Signature]	ES DIRECTLY ☐ OTHER ☒
Robbie Uku	32 New Rd RD2	[Signature]	ES DIRECTLY ☐ OTHER ☒
Rachael Deans	Wairio	R.S. Deans	ES DIRECTLY ☐ OTHER ☒
Paula Ridder	40 Brown Rd, RD2	[Signature]	ES DIRECTLY ☐ OTHER ☒
Graeme Ridder	40 Brown Rd RD2	[Signature]	ES DIRECTLY ☐ OTHER ☒
Gary McPherson	27 Rima Rd Kennington	G. McPherson	ES DIRECTLY ☐ OTHER ☒

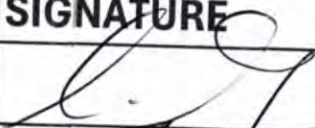
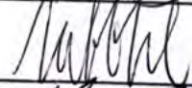
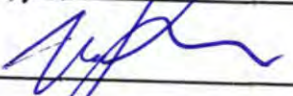
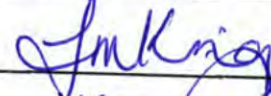
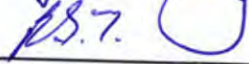
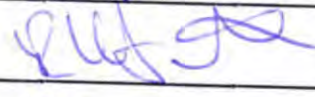
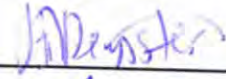
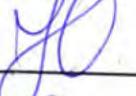
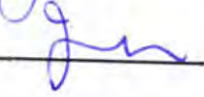
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
S. Tamati	tamatisheryl315@gmail.com		ES DIRECTLY ☐ OTHER ☒
Euphemia McGlen	220 Maith Street, Otautau		ES DIRECTLY ☐ OTHER ☒
Alm Forest	35 Brooke St		ES DIRECTLY ☐ OTHER ☒
Anne Alder Gough	" "		ES DIRECTLY ☐ OTHER ☒
David Roff	16 Liemans + Otautau		ES DIRECTLY ☐ OTHER ☒
CARVINE THOMSON	17 HUGHES LANE OTAUTAU		ES DIRECTLY ☐ OTHER ☒
Barb Clouston	99 Upper Scotts Gap Rd, P.D.2 Otautau		ES DIRECTLY ☐ OTHER ☒
Keri Howell	Thornbury		ES DIRECTLY ☐ OTHER ☒
Chantelle Hughes	Riverton		ES DIRECTLY ☐ OTHER ☒
Hilda Tippet	Riverton		ES DIRECTLY ☐ OTHER ☒
Tess Thulow	Tuatapere		ES DIRECTLY ☐ OTHER ☒
Hewr Harding	2 Half mile Tuatapere		ES DIRECTLY ☐ OTHER ☒
Elektra Harding	2 Half mile Tuatapere		ES DIRECTLY ☐ OTHER ☒
Suzie Elmes	4 Findlay Rd Orawia		ES DIRECTLY ☐ OTHER ☒
Clare Tipene	Papatotara Rd		ES DIRECTLY ☐ OTHER ☒
John O'Brien	1150 Clifden H/W RD1		ES DIRECTLY ☐ OTHER ☒
Jordan Lalle	19 Ayre St Stewart Island		ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Ruth Collingham	ruthcollinghames@gmail.com		ES DIRECTLY ☐ OTHER ☒
Tracey Young	108 SEWART RD		ES DIRECTLY ☒ OTHER ☐
Margaret Johnstone	52 Queen St Otara		ES DIRECTLY ☐ OTHER ☒
Helen McDonald	54 Rye Street		ES DIRECTLY ☐ OTHER ☒
Bridgette Lindsay	240 Gerard Road Drumnahoe		ES DIRECTLY ☒ OTHER ☐
Keenan Drake	51 Line St INV		ES DIRECTLY ☐ OTHER ☒
Alan Todd	34 Scur Street Bluff		ES DIRECTLY ☐ OTHER ☒
C. Baker	53 Slaughterhouse Rd		ES DIRECTLY ☐ OTHER ☒
Carole Baker	" " "		ES DIRECTLY ☐ OTHER ☒
Chris Axbey	axbey.chris@gmail.com		ES DIRECTLY ☐ OTHER ☒
C. ROE	12 PAPATOTARA ROAD		ES DIRECTLY ☐ OTHER ☒
SAM EGERTON	920 CUBEN HIGHWAY		ES DIRECTLY ☐ OTHER ☒
B Lucas	Half Mile Rd. Tui		ES DIRECTLY ☐ OTHER ☒
Peter Broughton	10 grey st Otara		ES DIRECTLY ☐ OTHER ☒
Matthew Egerton	2030 Clifden Blackmount		ES DIRECTLY ☐ OTHER ☒
Gregor Findlay	311/26 Morningside Dr, Auckland		ES DIRECTLY ☐ OTHER ☒
Scott Findlay	311/26 Morningside Dr, Auckland		ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Allan Dodds	allandodds21@gmail.com		ES DIRECTLY ☐ OTHER ☒
Pete Harland	peterharland@hotmail.co.nz		ES DIRECTLY ☐ OTHER ☒
Josh Van Lieshout	Josh.V@MORUAK.co.nz		ES DIRECTLY ☒ OTHER ☐
Rodney Campbell	Rodney@Prodrill.co.nz		ES DIRECTLY ☐ OTHER ☒
Anthony Campbell	anthony@legacyconstruction.co.nz		ES DIRECTLY ☐ OTHER ☒
Caleb Hudson	caleb@froydon.co.nz		ES DIRECTLY ☐ OTHER ☒
Mike McKee	Mike@froydon.co.nz		ES DIRECTLY ☐ OTHER ☒
Colin ROBERTS	33 Sinclair Ave Nightcaps		ES DIRECTLY ☐ OTHER ☐
August Pirere	www propine 0125@gmail.com		ES DIRECTLY ☐ OTHER ☒
Megan Unnes	akwapiere@gmail.com		ES DIRECTLY ☐ OTHER ☒
Harry Simpson	harry.simpson1494@icloud.com		ES DIRECTLY ☐ OTHER ☒
Luke Knowles	Luke.David@knowles.com		ES DIRECTLY ☐ OTHER ☒
Dale Potter	potter2002.dp@gmail.com		ES DIRECTLY ☐ OTHER ☒
Richard Tregere	utataru tataru-rd		ES DIRECTLY ☐ OTHER ☒
Grant Hawking	2 Half Mile Road		ES DIRECTLY ☐ OTHER ☒
John Ave	38 Carlyle St Matamoras		ES DIRECTLY ☐ OTHER ☒
Brendan Cairns	bcairns@totalsite.co.nz		ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Wendy Johnson	285 Drummond Oreti Rd	W Johnson	ES DIRECTLY ☐ OTHER ☒
Andrew Gordon	1575 Wreys bush Mossburn	A Gordon	ES DIRECTLY ☐ OTHER ☒
Isaia Alefosio	285 Drummond Oreti Rd	Isaia	ES DIRECTLY ☐ OTHER ☒
SHANE KEMPSON	2097 Winton - Cornfield Rd	Shane	ES DIRECTLY ☐ OTHER ☒
CHAC ROBINSON	15 ACTARON RD, RO6 NGILL 876	Chac	ES DIRECTLY ☐ OTHER ☒
CHANCE MUIR	723 WINTON CORNFIELD RD	Chance	ES DIRECTLY ☐ OTHER ☒
Philip Hamilton	54 church st winton	Ph Hamilton	ES DIRECTLY ☐ OTHER ☒
Connor Christie	7 East Bourne park RD ^{Flints Bush}	Connor	ES DIRECTLY ☐ OTHER ☒
Hannah-Reva	7 East Bourne park RD ^{Flints Bush}	Hannah	ES DIRECTLY ☐ OTHER ☒
Gary Wivell	51 Wilfrid Street Invercargill	Gary	ES DIRECTLY ☐ OTHER ☒
Alexander McFarlane	alex@w9100.co.nz	Alex	ES DIRECTLY ☐ OTHER ☒
Brendon Roff	broff@PGG-Wrightson.co.nz	BMRoff	ES DIRECTLY ☐ OTHER ☒
Kris Shumbe	KrisShumbe@yahoo.co.nz	Kris	ES DIRECTLY ☐ OTHER ☒
ALP Munro	DEMONE DP-100	ALP	ES DIRECTLY ☐ OTHER ☐
Paulie White	Bigdoggottaeat@hotmail.co.uk	Paulie	ES DIRECTLY ☐ OTHER ☒
PETE FAULKES	544 GLADFIELD RD OIAU	P Faulkes	ES DIRECTLY ☐ OTHER ☒
			ES DIRECTLY ☐ OTHER ☐

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Rachel Brankin	+hebrankins95@gmail.com	R Brankin	ES DIRECTLY ☐ OTHER ☐
Heleen Brown	helhandmax@gmail.com	H Brown	ES DIRECTLY ☐ OTHER ☒
Megan Jackson	maavis6874@gmail.com	MJ	ES DIRECTLY ☐ OTHER ☒
Joan Browning	frances060759@hotmail.com	J Browning	ES DIRECTLY ☐ OTHER ☒
P Calder	clipton glenwooddevelopment.co.nz	P Calder	ES DIRECTLY ☐ OTHER ☒
S Calder	Dipton glenwooddevelopment.co.nz	S Calder	ES DIRECTLY ☐ OTHER ☒
Julie Pearce	Ohari, 6 Hastings St	J Pearce	ES DIRECTLY ☐ OTHER ☒
Michael Duggan	189 AVON Road Invercargill	M Duggan	ES DIRECTLY ☐ OTHER ☒
David Lake	54 Clarendon St Winton	D Lake	ES DIRECTLY ☐ OTHER ☒
Donna Cullen	donnacullen@hotmail.co.nz	D Cullen	ES DIRECTLY ☐ OTHER ☒
Jane Cullen	118 Makara Street Winton	J Cullen	ES DIRECTLY ☐ OTHER ☒
Joni Millar	274 Waimatuku South Rd.	J Millar	ES DIRECTLY ☒ OTHER ☐
Vonessa Iddles	bollicie@extra.co.nz	V Iddles	ES DIRECTLY ☐ OTHER ☒
Betty Favel	20 a Waterford Drive	B Favel	ES DIRECTLY ☐ OTHER ☒
J Graham	shop@withgrace.co.nz	J Graham	ES DIRECTLY ☐ OTHER ☒
Pam Brack	pabrack@extra.co.nz	P Brack	ES DIRECTLY ☐ OTHER ☒
Maria Scammell	Scammellfamily@extra.co.nz	M Scammell	ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Clayton Jones	claytonjones@sta.co.nz		ES DIRECTLY ☐ OTHER ☒
David Kean	david.kean@tra.co.nz		ES DIRECTLY ☐ OTHER ☒
Matthew Cairns	Cairns.Matthew1@gmail.com		ES DIRECTLY ☐ OTHER ☒
Rylon Cooper	rylancooper205@gmail.com		ES DIRECTLY ☐ OTHER ☒
MARTY GARAWA	MARTY.GO@XTRA.CO.NZ.		ES DIRECTLY ☐ OTHER ☒
Jackie Keene	50 DeJoux road		ES DIRECTLY ☐ OTHER ☒
Murray Keene	50 DeJoux road		ES DIRECTLY ☐ OTHER ☒
Robyn Loudon	251025 21 McWilliam Street Winton	R. Loudon	ES DIRECTLY ☐ OTHER ☒
Tania King	31 Johnstone Rd, Otakau		ES DIRECTLY ☐ OTHER ☒
Brian Taylor	43 Durham St. Winton		ES DIRECTLY ☐ OTHER ☒
Jessie Loudon	21 McWilliam Ave Winton	J. Loudon	ES DIRECTLY ☐ OTHER ☒
M. Willis	Durham St		ES DIRECTLY ☐ OTHER ☒
Mike Suta	64 Levens St DUNEDIN		ES DIRECTLY ☒ OTHER ☐
Jackie Penpster	NZU's crescent		ES DIRECTLY ☐ OTHER ☒
Liesbet Leungh	liesbet.leungh@gmail.com		ES DIRECTLY ☒ OTHER ☐
Jane Bergman	J.Bergman@overgarden.co.nz		ES DIRECTLY ☐ OTHER ☒
Gianne Macdonald	macmachineryimports@gmail.com		ES DIRECTLY ☐ OTHER ☒

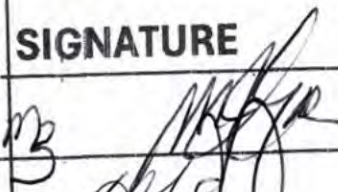
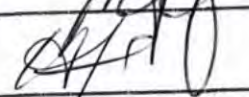
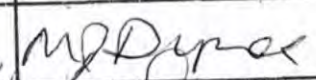
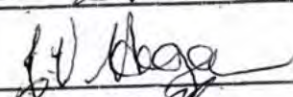
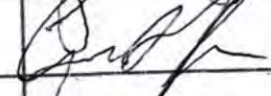
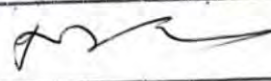
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Jaimee Elder	8 castle st Rivenhall	J Elder	ES DIRECTLY ☐ OTHER ☒
Zane Kelly	ZaneKelly697@yahoo.co.nz	Zane Kelly	ES DIRECTLY ☐ OTHER ☒
Julie Hammit	J.r.hammit@icloud.com	Julie Hammit	ES DIRECTLY ☐ OTHER ☒
David wheeley	d.wheelage@extra.co.nz	David wheeley	ES DIRECTLY ☐ OTHER ☒
Alex Clark	alex.Clark@pggwrightson.co.nz	Alex Clark	ES DIRECTLY ☐ OTHER ☒
PAUL SULLIVAN	PAUL.SULLIVAN@PGGWRIGHTSON.CO.NZ	PS	ES DIRECTLY ☐ OTHER ☒
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			ES DIRECTLY ☐ OTHER ☐
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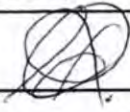
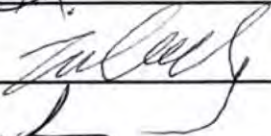
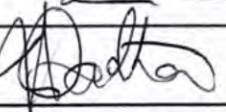
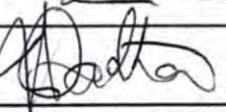
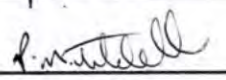
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Brian Stodart	1413 Avondale Road	BD Stodart	ES DIRECTLY ☐ OTHER ☒
Wayne Gray	159 Flora Road east Frigill	W B Gray	ES DIRECTLY ☐ OTHER ☒
Brent Johnston	Drummond	B Johnston	ES DIRECTLY ☐ OTHER ☒
Graeme McCallum	Kennedy Road Taramoa	G McCallum	ES DIRECTLY ☐ OTHER ☒
J Doodles	Drummond	J Doodles	ES DIRECTLY ☐ OTHER ☒
R Miller	154 Boundary RD	R Miller	ES DIRECTLY ☐ OTHER ☒
C Piker	Island bank pub	C Piker	ES DIRECTLY ☐ OTHER ☒
W M	Heaton bank	W M	ES DIRECTLY ☐ OTHER ☒
Watt Birch	Dunearn	W Birch	ES DIRECTLY ☐ OTHER ☒
Kylie Valli	Omanu	K Valli	ES DIRECTLY ☐ OTHER ☒
Koles Lesty	Boundary Road Drummond	K Lesty	ES DIRECTLY ☐ OTHER ☒
Chris Tunnage	Drummond	C Tunnage	ES DIRECTLY ☐ OTHER ☒
Katrina Peoples	Oreti Plains Rd	K Peoples	ES DIRECTLY ☐ OTHER ☒
Graeme Gallagher	Winton Wreys Bush Rd.	G Gallagher	ES DIRECTLY ☐ OTHER ☒
Kaleb Holdem	Oreti Plains	K Holdem	ES DIRECTLY ☐ OTHER ☒
Samantha Sargent	Munro Road	S Sargent	ES DIRECTLY ☐ OTHER ☒
Oliver Wilson	Drummond	O Wilson	ES DIRECTLY ☐ OTHER ☒

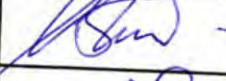
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Helin McLees	8 Douglas St.	<i>Helin McLees</i>	ES DIRECTLY ☐ OTHER ☒
Bart Carter	29 WATERFORD DRIVE	<i>B Carter</i>	ES DIRECTLY ☐ OTHER ☒
IAN BRACKFIELD	146 CAMPBELL Rd.	<i>I Brackfield</i>	ES DIRECTLY ☐ OTHER ☒
Dewey Marshall	14 Church St Winton	<i>D Marshall</i>	ES DIRECTLY ☐ OTHER ☒
Jocelyn HAMILTON	27 WATERFORD DR, WINTON	<i>J Hamilton</i>	ES DIRECTLY ☐ OTHER ☒
ELLEN BALLANTRAE	32 NORTHVIEW WINTON	<i>E Ballantrae</i>	ES DIRECTLY ☐ OTHER ☐
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Geoff Lindsay	geoffe gladvaleforms.co.nz	89 2	ES DIRECTLY ☒ OTHER ☐
Colin McDonald	edmed60@gmail.com	Colin D	ES DIRECTLY ☐ OTHER ☒
Lindsay Gerrard Judith Gerrard	46 Smith Road 3 RD Winton	L. Gerrard	ES DIRECTLY ☐ OTHER ☒
Geoffrey Young		Geoffrey Young	ES DIRECTLY ☐ OTHER ☒
Mark Dillon	dillonbeetharvesting@gmail.com	Mark	ES DIRECTLY ☐ OTHER ☒
Finlay Weatherburn	the weatherburns extra	FS Weatherburn	ES DIRECTLY ☐ OTHER ☐
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
			ES DIRECTLY ☐ OTHER ☐
Mickayla Mayernity	50 Drummond Haddon Bush Rd	M Mayernity	ES DIRECTLY ☐ OTHER ☒
Amy Green	Scotts Gap.	A Green	ES DIRECTLY ☐ OTHER ☒
Arnold Butt	13 Avenal Drive Celobur	A Butt	ES DIRECTLY ☐ OTHER ☒
PJ Clarke	3 Memorial Ave Drummond	PJ Clarke	ES DIRECTLY ☐ OTHER ☒
Craig Sharp	449 Nightcaps Ohae Highway	C Sharp	ES DIRECTLY ☐ OTHER ☒
Bailey McCollum	429 Norman Rd Winton	B McCollum	ES DIRECTLY ☐ OTHER ☒
Keira Montgomery	567 Riverside rd Winton	K Montgomery	ES DIRECTLY ☐ OTHER ☒
Shania Dew	"	S Dew	ES DIRECTLY ☐ OTHER ☒
Larissa Docherty	Larissa.Docherty@gmail.com	Larissa Docherty	ES DIRECTLY ☐ OTHER ☒
Andrew Rawstorn	Andrew.Rawstorn@gmail.com	A Rawstorn	ES DIRECTLY ☐ OTHER ☒
			ES DIRECTLY ☐ OTHER ☐
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Maurice Green	mauricegreen9slingshot@.mg		ES DIRECTLY ☒ OTHER ☐
Jure Top	juretop@gmail.com		ES DIRECTLY ☒ OTHER ☐
Moana Dyer	moayder@gmail.com		ES DIRECTLY ☐ OTHER ☒
Margaret Dyer	67 Welch Rd Winton		ES DIRECTLY ☐ OTHER ☒
Elena Studwick	Delby Rd 3 Winton		ES DIRECTLY ☒ OTHER ☒
J. V. Baga	32 Vogel st		ES DIRECTLY ☐ OTHER ☐
Gracie Hepar	32 Vogel Street		ES DIRECTLY ☐ OTHER ☒
James Chaybell	67 Welch Rd Winton		ES DIRECTLY ☐ OTHER ☐
Chris Harold	295 Cooper Rd RD1 Winton		ES DIRECTLY ☒ OTHER ☐
Sophie Smithies	polkadot285@gmail.com		ES DIRECTLY ☐ OTHER ☒
Kamla Ruben	KamlaRuben@gmail.com		ES DIRECTLY ☐ OTHER ☒
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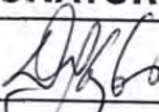
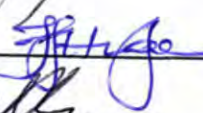
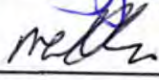
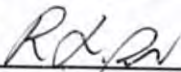
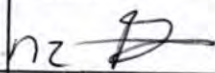
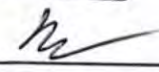
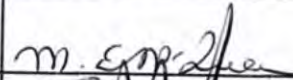
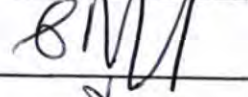
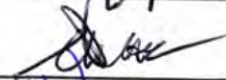
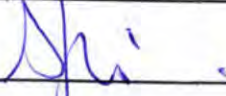
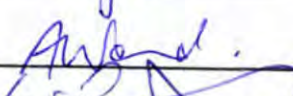
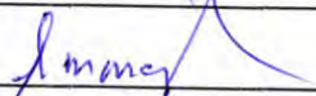
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Christina Roach	christina.Roach@icloud.com		ES DIRECTLY ☐ OTHER ☒
Jo Murphy	b@lighthouse-scotland.org.nz		ES DIRECTLY ☒ OTHER ☐
Tamar Jonathan	trj@jonathan-extra.co.nz		ES DIRECTLY ☐ OTHER ☒
Keren Jonathan	trj@jonathan-extra.co.nz		ES DIRECTLY ☐ OTHER ☒
Trish Mitchell	39 Vogel Place, Invercargill		ES DIRECTLY ☐ OTHER ☒
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			ES DIRECTLY ☐ OTHER ☐
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Kylie Craig Blackwood	Kylieknock@hotmail.com cablackwood@gmail.com		ES DIRECTLY ☐ OTHER ☒
Sarah Sorensen	zajon.propeatics@gmail.com		ES DIRECTLY ☐ OTHER ☒
Bronie Stevenson	geobron@slingshot.co.nz		ES DIRECTLY ☐ OTHER ☒
Donna Silke	donsilke24@gmail.com		ES DIRECTLY ☒ OTHER ☒
Jen Gacksir	JenJen24@hotmail.co.nz		ES DIRECTLY ☒ OTHER ☒
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			ES DIRECTLY ☐ OTHER ☐
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Dona Ryder	3 Louisa St.	[Signature]	ES DIRECTLY ☐ OTHER ☒
Michelle Marshall	109 Carn St	[Signature]	ES DIRECTLY ☐ OTHER ☒
Deb Racz	debbieracz@outlook.co.nz	[Signature]	ES DIRECTLY ☐ OTHER ☒
Glen's Potter	51 Main Rd	[Signature]	ES DIRECTLY ☐ OTHER ☒
Christine Hannery	345 Waiholo Highway Milburn	[Signature]	ES DIRECTLY ☐ OTHER ☒
Michael & Helen Kawalewski	906 Waimahakoe, Lyndham	[Signature]	ES DIRECTLY ☐ OTHER ☒
Geoff Scott	1 RD Kennington	[Signature]	ES DIRECTLY ☐ OTHER ☒
Stephen Chernish	14 Taurua Street, Lumsden	[Signature]	ES DIRECTLY ☐ OTHER ☐
Lee Manson	raykeman@xtra.co.nz	[Signature]	ES DIRECTLY ☐ OTHER ☐
Fraser	gilroy40@hotmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Jilly Bradshaw	jill_bradshaw@windowslive.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
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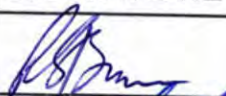
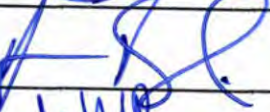
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Helen Holmes	12 Union St Winton		ES DIRECTLY ☐ OTHER ☒
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			ES DIRECTLY ☐ OTHER ☐
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Blair Wisely	netherton_farm@yahoo.co.nz	Blair Wisely	ES DIRECTLY ☐ OTHER ☒
Nadia Wisely	mswiz77@gmail.com	Nadia Wisely	ES DIRECTLY ☐ OTHER ☒
			ES DIRECTLY ☐ OTHER ☐
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
David Hughes.	ballyhooley farms @ xtra . co . nz .		ES DIRECTLY ☐ OTHER ☒
Fiona Hughes	ballyhooleyfarms@xtra.co.nz		ES DIRECTLY ☐ OTHER ☒
Matt Coleman	Matty_Coleman@hotmail.com		ES DIRECTLY ☐ OTHER ☒
Rachel Paul	Kincaid-rachel@hotmail.com		ES DIRECTLY ☐ OTHER ☒
Gabi Seator	gabi.seator@gmail.com		ES DIRECTLY ☐ OTHER ☒
Amy Banks	amybanks90@yahoo.co.nz		ES DIRECTLY ☐ OTHER ☒
Paige Cook	paigeecook7@gmail.com		ES DIRECTLY ☐ OTHER ☒
Malcolm Hiddleston	malhid56@gmail.com		ES DIRECTLY ☐ OTHER ☒
James McMahon	James.McMahon21@hotmail.com		ES DIRECTLY ☐ OTHER ☒
Marie McQueen	marie.mcqueen-01@gmail.com		ES DIRECTLY ☐ OTHER ☒
Carl Halford	carl@wetandforget.co.nz		ES DIRECTLY ☐ OTHER ☒
Mike Leask	1970nzrebele@gmail.com		ES DIRECTLY ☐ OTHER ☒
Sue Kincaid	sueandpaul10xtra.co.nz		ES DIRECTLY ☐ OTHER ☒
Avis Ward	a.wward@xtra.co.nz.		ES DIRECTLY ☐ OTHER ☒
Michael Rebert	pommichael@xtra.co.nz		ES DIRECTLY ☐ OTHER ☒
John McHugh	mcHugh-winton@gmail.com		ES DIRECTLY ☐ OTHER ☒
Shane Phillips	Shane Robert Phillips@gmail.com		ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
A. Crawford	adwincrawford@icloud.com	<i>A. Crawford</i>	ES DIRECTLY ☐ OTHER ☒
B. Hamilton	balinhamilton@icloud.com	<i>B.D. Hamilton</i>	ES DIRECTLY ☐ OTHER ☒
D. Byars	asudean@live.com	<i>D. Byars</i>	ES DIRECTLY ☐ OTHER ☒
K. Cvent	kellie.nathanextra.co	<i>K. Cvent</i>	ES DIRECTLY ☐ OTHER ☒
M. Kingma	mlkingma7legmail.com	<i>M. Kingma</i>	ES DIRECTLY ☐ OTHER ☒
Des Macgregor	sharaanddes@gmail.com	<i>Des Macgregor</i>	ES DIRECTLY ☐ OTHER ☒
Brent Capen	nightcaps	<i>Brent Capen</i>	ES DIRECTLY ☐ OTHER ☒
Syd Stronach	109 Park St Winston	<i>S. Stronach</i>	ES DIRECTLY ☒ OTHER ☐
R. Byars	robbie-byars@hotmail.com	<i>R. Byars</i>	ES DIRECTLY ☐ OTHER ☒
Jill Palmer	jillian83@hotmail.co.nz	<i>Jill Palmer</i>	ES DIRECTLY ☐ OTHER ☒
CHRIS LEWIS	15 GEORGE ST	<i>Chris Lewis</i>	ES DIRECTLY ☐ OTHER ☒
Gretchen Hill	32 Gra. Gretchen ned 25@hotmail.com	<i>G. Hill</i>	ES DIRECTLY ☐ OTHER ☒
Linda Enlwisle	150 Pukearua Rd Kauaia	<i>L. Enlwisle</i>	ES DIRECTLY ☐ OTHER ☒
KENNETH HILL	MORBIDNZ@gmail.com	<i>Kenneth Hill</i>	ES DIRECTLY ☐ OTHER ☒
TIM GOUGH	tim.gough@hotmail.com	<i>Tim Gough</i>	ES DIRECTLY ☐ OTHER ☒
Rachel Howley	873 Hundred line Centre Bush	<i>R. e. Howley</i>	ES DIRECTLY ☐ OTHER ☒
Olivia Gunn	42 Brooklands rd Hinton	<i>Olivia Gunn</i>	ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Maureen Johnston	maureenjohnston@gmail.co	Mt. Johnston	ES DIRECTLY ☐ OTHER ☒
PARE CARRAN	paretaucarran@gmail.com	P.T. Carran	ES DIRECTLY ☐ OTHER ☒
Glenn Wallace	pinccare southland.e@gmail.com	Glenn W	ES DIRECTLY ☐ OTHER ☒
Dan Ryan	danielheraday@live.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Greene Carran	G.Carran & extra.co.nz	G.C.	ES DIRECTLY ☐ OTHER ☒
Shari Drake	admin@drakeplumbing.co.nz	Shari Drake	ES DIRECTLY ☐ OTHER ☒
Rite Ukak	danielberkaik@yahoo.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Anne Smith	kevanneje slingshot.co.nz	[Signature]	ES DIRECTLY ☐ OTHER ☒
Kent Evans	cheisbyrne2002@gmail.com	K. Evans	ES DIRECTLY ☐ OTHER ☒
Shania Deans	Shaniodeans88@gmail.com	SRDB	ES DIRECTLY ☐ OTHER ☒
FRANCES Hotes		F Hotes	ES DIRECTLY ☐ OTHER ☒
Catherine Philp	Catherine philp @ extra.co.nz	[Signature]	ES DIRECTLY ☐ OTHER ☒
Lanya Jarbert	alphazimbo@gmail.com	Lanya Jarbert	ES DIRECTLY ☐ OTHER ☒
Mike McFadzien	men1ce@hotmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Barbara Thompson	26 Eton Street	BM Thompson	ES DIRECTLY ☐ OTHER ☒
Lebbie Saul	35 Leman St	Lebbie Saul	ES DIRECTLY ☐ OTHER ☒
NAKITA BLUMENTHAL	31 LIEMEN ST.	[Signature]	ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Royden Brown	60 KING ST OTAUTAU		ES DIRECTLY ☐ OTHER ☒
Andre Bekkeris	29 Deua St Otautau		ES DIRECTLY ☐ OTHER ☒
P J Gutsell	24 Nait Wick St Otautau	P J G	ES DIRECTLY ☐ OTHER ☐
S Russell	2270 OHAI-CHIFEN G-14		ES DIRECTLY ☐ OTHER ☒
Aaron Barnes	463 Otautau Wrege Bush rd		ES DIRECTLY ☐ OTHER ☒
Murray Brown	Tweedvale@outlook	WMB	ES DIRECTLY ☐ OTHER ☐
Margaret McAuley	Otautau	mc McAuley	ES DIRECTLY ☐ OTHER ☒
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Alexander Reid	helen_dave@xtra.co.nz	C Reid	ES DIRECTLY ☐ OTHER ☒
Raymond Bentley	48 Sinclair ave Nighthawk	R Bentley	ES DIRECTLY ☐ OTHER ☒
Dwaine Bentley	23 Clifton highway	D Bentley	ES DIRECTLY ☐ OTHER ☒
Ben Stevenson	BenjStevenson@outlook.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Charlotte Marsh	thefoxclub2917@hotmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
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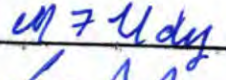
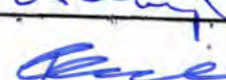
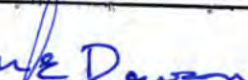
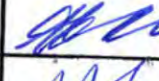
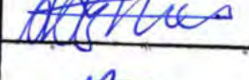
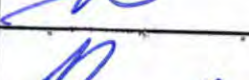
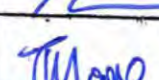
Page 310
Page 2 of 3

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
e. hi	109 Birchwood Rd 0441	e. hi	ES DIRECTLY ☐ OTHER ☒
Time Barrett	Orepuki Riverdon	TB	ES DIRECTLY ☐ OTHER ☒
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Linda Nicol	lindandlindsay@gmail.com	L. Nicol	ES DIRECTLY ☐ OTHER ☒
Chris Garrett	11 Leithen St Nightcaps	[Signature]	ES DIRECTLY ☐ OTHER ☒
Pete Forrester	18 molly at st. Nightcaps	[Signature]	ES DIRECTLY ☐ OTHER ☒
Mal Bromley	26 High St West Nightcaps	[Signature]	ES DIRECTLY ☐ OTHER ☒
Carl Bromley	26 High St West Nightcaps	[Signature]	ES DIRECTLY ☐ OTHER ☒
Sam Grayson	16 High St West	[Signature]	ES DIRECTLY ☐ OTHER ☒
LEAH KENNARD	29 WAIKID ROAD	[Signature]	ES DIRECTLY ☐ OTHER ☒
Hine Livingstone	145 Birchwood Rd	[Signature]	ES DIRECTLY ☐ OTHER ☒
Noreen McGee	40 Blue bottle road HOI	[Signature]	ES DIRECTLY ☐ OTHER ☒
Barbara Hemphre	1 Birchwood Road Oha	[Signature]	ES DIRECTLY ☐ OTHER ☒
Pick Burke	347 Brydora - Glencoe	[Signature]	ES DIRECTLY ☐ OTHER ☒
Liz Waters	Somerset Road	[Signature]	ES DIRECTLY ☐ OTHER ☒
NOEL CURTIN	5 LEITHEN ST Nightcaps	[Signature]	ES DIRECTLY ☐ OTHER ☒
Tunis RATA	131 Birchwood Rd	T Rata	ES DIRECTLY ☐ OTHER ☒
Gloria McEntyre	21 John Rd N'cap	[Signature]	ES DIRECTLY ☐ OTHER ☒
IAN Wilson	102 BIRCHWOOD RD OHA	[Signature]	ES DIRECTLY ☐ OTHER ☒
Yvonne Smith	pdaipirate@gmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Harbans Hurst	sharbans911@gmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
KENNETH BROOKS	15 Kelly Road Nghtcaps	[Signature]	ES DIRECTLY ☐ OTHER ☒
Trevor Anderson	127 Wreys Bush Hardem Road	[Signature]	ES DIRECTLY ☐ OTHER ☒
Mane Anderson	" " " "	[Signature]	ES DIRECTLY ☐ OTHER ☒
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Danny Vardon	Mackenzie st Winton	<i>[Signature]</i>	ES DIRECTLY ☐ OTHER ☒
RS McDowell	53A Dulce St in.	<i>RS McD.</i>	ES DIRECTLY ☐ OTHER ☒
Chloe McDowell	168 Mackenzie St Winton	<i>Chloe</i>	ES DIRECTLY ☐ OTHER ☒
Rachel Spice	124 Park Street, Winton	<i>Rachel Spice</i>	ES DIRECTLY ☐ OTHER ☒
Brad Spice	124 Park Street, Winton	<i>Brad Spice</i>	ES DIRECTLY ☐ OTHER ☒
Hannah Wilson	1601 Glencoe Highway, RD2 Invercargill	<i>Hannah Wilson</i>	ES DIRECTLY ☐ OTHER ☒
Kate Johnston	2182 Winton Hedgehope Rd	<i>[Signature]</i>	ES DIRECTLY ☐ OTHER ☒
Paula Stewart	paulastewart14@gmail.com	<i>Paula Stewart</i>	ES DIRECTLY ☒ OTHER ☒
Tash Jamieson	bevan.tash@xtra.co.nz	<i>Tash Jamieson</i>	ES DIRECTLY ☐ OTHER ☒
Amber Joyce	markandamby@gmail.com	<i>Amber Joyce</i>	ES DIRECTLY ☐ OTHER ☒
Jo-anne Heatherington	heatheringtons@xtra.co.nz	<i>Jo-anne Heatherington</i>	ES DIRECTLY ☐ OTHER ☒
Carmen Hedge	699 Ruar Bush Wailaibun Rd	<i>[Signature]</i>	ES DIRECTLY ☐ OTHER ☒
Kim Marshall	240 Lyford Street	<i>Kim Marshall</i>	ES DIRECTLY ☐ OTHER ☒
Barbara Anderson	185 Gap Road East RD1 Winton	<i>B. A. Anderson</i>	ES DIRECTLY ☐ OTHER ☒
Marion McDonald	287 Kerr Road Dune	<i>M. McDonald</i>	ES DIRECTLY ☐ OTHER ☒
Brenda Stirling	16 Hamilton Avenue Winton	<i>[Signature]</i>	ES DIRECTLY ☐ OTHER ☒
Shona Stewart	617 Lynch Road RD1	<i>Shona Stewart</i>	ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Thomas Roberts	thomasroberts1307@gmail.com		ES DIRECTLY ☐ OTHER ☒
Warick Roberts	Flatvale@xtra.co.nz		ES DIRECTLY ☐ OTHER ☒
Christine Maclean	caandcj@yahoo.co.nz		ES DIRECTLY ☐ OTHER ☒
Margaret Udy	621 Josephville-Glenue RD Balfour		ES DIRECTLY ☐ OTHER ☒
Laura Dawson	laura.dawson@realnz.com		ES DIRECTLY ☐ OTHER ☒
Angie Campbell	angiec88@icloud.com		ES DIRECTLY ☐ OTHER ☒
Franki Campbell	franki.campbell@icloud.com		ES DIRECTLY ☐ OTHER ☒
Marion Dawson	87 Gillespie Road Te Anau		ES DIRECTLY ☐ OTHER ☒
Steve Brown	57 Spence Ave Otatara		ES DIRECTLY ☐ OTHER ☒
Alena Howden	42A Gap Road Rd Winton		ES DIRECTLY ☐ OTHER ☒
Anna Ashmore	anna.ashmore22@gmail.com		ES DIRECTLY ☐ OTHER ☒
Bridget Bell	1769a Wyeys Burn Mossburn rd 201 Otatara		ES DIRECTLY ☐ OTHER ☒
Nigel Glen	Chester@outlook.co.uk		ES DIRECTLY ☐ OTHER ☒
Tamiah Moore	27 Winton Wyeys Bgsk		ES DIRECTLY ☐ OTHER ☒
Nadine Keen	410 McKenzie Road		ES DIRECTLY ☐ OTHER ☒
Lucy Keen	410 McKenzie Road		ES DIRECTLY ☐ OTHER ☒
Chris Watson	chris@profocus.co.nz		ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
PHIL PROCTOR	56 Stanley St Wairoa	P.J. Proctor	ES DIRECTLY ☐ OTHER ☒
CHRIS Pinn	6 MASON RD NIGHTCAPS	[Signature]	ES DIRECTLY ☐ OTHER ☒
Gordon Bennett	1 Benson Rd. Nightcaps	G. Bennett	ES DIRECTLY ☐ OTHER ☒
Phil Manson	58 Sinclair Avenue Nightcaps	[Signature]	ES DIRECTLY ☐ OTHER ☒
Selena Cameron	Cameron19825@gmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
JOHN Low		[Signature]	ES DIRECTLY ☐ OTHER ☒
Simon Jukes	1 Clapps St Nightcaps	[Signature]	ES DIRECTLY ☐ OTHER ☒
Vixi Harrison	vixann77@gmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Rikki Worra	19 High St East	[Signature]	ES DIRECTLY ☐ OTHER ☒
Marilee Edwards	43 Tinkertown Road	M. Edwards	ES DIRECTLY ☐ OTHER ☒
			ES DIRECTLY ☐ OTHER ☐
			ES DIRECTLY ☐ OTHER ☐
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
STEW WEIR	stewardcarol@xtra.co.	[Signature]	ES DIRECTLY ☐ OTHER ☒
Colin Laughton	Springs 1 RD Winton	[Signature]	ES DIRECTLY ☐ OTHER ☒
Leticia Frew	lemacsfrew@gmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Matt Lane	mattlane@hotmail.co.nz	[Signature]	ES DIRECTLY ☐ OTHER ☒
Jasmine Lane	jazz-waters2011@live.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Kate Pulley	pulleykate246@gmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Katrina Cook	bradleyandkatrina@msn.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Michael Tyler	michaeltyler2005@hotmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Emma Tyler	michaeltyler2005@hotmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Tracey Hansen	tracey@mmca.co.nz	[Signature]	ES DIRECTLY ☐ OTHER ☒
David Scoles	david.scoles86@hotmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Billy Stewart	stewey.bija@gmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
Darylann Sim	simplus@velocitynet.co.nz	[Signature]	ES DIRECTLY ☐ OTHER ☒
As Todd	53 Steel Rd Otahuhu	[Signature]	ES DIRECTLY ☐ OTHER ☒
Michelle Roberts	15 Memorial Ave Drummoyne	[Signature]	ES DIRECTLY ☐ OTHER ☒
Hannah Roberts	15 Memorial Ave Drummoyne	[Signature]	ES DIRECTLY ☐ OTHER ☒
Richie Roberts	15 Memorial Ave Dr.	[Signature]	ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
M. Farley	203 McNor Road, RD6, Ingill	M. Farley	ES DIRECTLY ☐ OTHER ☒
Judi Scott	27 Dyson St Ingill	J. Scott	ES DIRECTLY ☐ OTHER ☒
R KENDALL	11/187 GANA ST INGILL	R. A. Kendall	ES DIRECTLY ☐ OTHER ☒
J. Beutake	191 King St Invercargill	J. Beutake	ES DIRECTLY ☐ OTHER ☒
L.G. Rewcastle	68 Jerkin St Invercargill	L.G. Rewcastle	ES DIRECTLY ☐ OTHER ☒
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Joan Rabbitt	joanrabbitt@xtra.co.nz	mjabbitt	ES DIRECTLY ☒ OTHER ☒
Damian Rabbitt	221 Winton Channel Road	D.V. Rabbitt	ES DIRECTLY ☒ OTHER ☒
Katrina Moore	hippy-chick76@hotmail.com	KO Moore	ES DIRECTLY ☒ OTHER ☒
Ann Heath	wirefarming11@gmail.com		ES DIRECTLY ☒ OTHER ☐
Megan Greenfield	72 Mel drum St, Winton	M Greenfield	ES DIRECTLY ☐ OTHER ☒
Neil M Telford	2586 Mavora Lakes Road T. Jhu	N M Telford	ES DIRECTLY ☐ OTHER ☒
MARGRET NORMAN	norm800@hotmail.com		ES DIRECTLY ☐ OTHER ☒
Heidi Middleton	heidiandbrett@hotmail.co.nz	Heidi Middleton	ES DIRECTLY ☐ OTHER ☒
Sarah Illsley	sarahillsley@fancie.co.nz		ES DIRECTLY ☐ OTHER ☒
Lisa Reed	relisaed@gmail.com	L M R	ES DIRECTLY ☐ OTHER ☒
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Neil, Hammond	84 Forresters Road	NJ Hammond	ES DIRECTLY ☐ OTHER ☒
Stewart Cowan	560 Drummond Crest Road.	Stewart	ES DIRECTLY ☐ OTHER ☒
Ma Cowan	129 Park St Winton	McCowan	ES DIRECTLY ☐ OTHER ☒
Rakie Sellars	40 Meldrum St Winton	RSellars	ES DIRECTLY ☐ OTHER ☒
Louise Tutton	24 Hamilton Av, Winton	Tutton	ES DIRECTLY ☐ OTHER ☒
Rachel Jackson	493 Council Rd Makarewa	RJ	ES DIRECTLY ☒ OTHER ☒
Claire Burgess	260 South Hillend Dipton Rd	CBurgess	ES DIRECTLY ☐ OTHER ☐
Jose van der Pael	388 Harbour Endowment Rd	Jose van der Pael	ES DIRECTLY ☐ OTHER ☒
Deryck Burgess	260 5th Hillend Dipton Rd	DBurgess	ES DIRECTLY ☐ OTHER ☒
Nicola Morshall	45 Queest Winton.	NMorshall	ES DIRECTLY ☐ OTHER ☒
Gillian Hargsten	215 Gsp Rd East Winton	GHargsten	ES DIRECTLY ☒ OTHER ☐
Vicki Meskouskas	13 Tom Plate Drive Te Anau	VMeskouskas	ES DIRECTLY ☒ OTHER ☐
Jason Meskouskas	13 Tom Plate Dr Te Anau	JMeskouskas	ES DIRECTLY ☒ OTHER ☐
Paula Carter	98 Gouen Drive, Te Anau	PCarter	ES DIRECTLY ☐ OTHER ☒
Kerri James	56 Lakefront Dr Te Anau	KJames	ES DIRECTLY ☐ OTHER ☒
JUSTIN REYNOLDS	45A FERGUS SQUARE TE ANAU	JReynolds	ES DIRECTLY ☐ OTHER ☒
			ES DIRECTLY ☐ OTHER ☐

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
R/D	R.12 OTAUTAU	R/D	ES DIRECTLY ☐ OTHER ☒
Richard Drain	19 Hughie's Lane 21 Hulme Street	Richard Drain	ES DIRECTLY ☐ OTHER ☒
Dan Kyle	34 Eton St	Dan Kyle	ES DIRECTLY ☐ OTHER ☒
Stephen Leask	83 Barrows St. Bluff.	Stephen Leask	ES DIRECTLY ☐ OTHER ☒
Gordon Leask	STEWART ISLAND	Gordon Leask	ES DIRECTLY ☐ OTHER ☒
KEITH FROWDE	33 NANTWICHT ST OTAUTAU	Keith Frowde	ES DIRECTLY ☐ OTHER ☒
Noel Anderson	11 Bungalow Hill Rd Colac Bay	Noel Anderson	ES DIRECTLY ☐ OTHER ☒
Adrian Memell	27 Bath rd Riverton	Adrian Memell	ES DIRECTLY ☐ OTHER ☒
Shelley Price	70 Meldrum St Winton	Shelley Price	ES DIRECTLY ☐ OTHER ☒
Lise Simpson	1046 Otautau Nightcaps Road	Lise Simpson	ES DIRECTLY ☐ OTHER ☒
John Young	R.D. 2 WINTON	John Young	ES DIRECTLY ☐ OTHER ☒
Sue Buchanan	34 Hodgkinson Rd, RD2 Winton	Sue Buchanan	ES DIRECTLY ☐ OTHER ☒
Tracey Saunders	134 Transmission Line Rd RD3 Winton	Tracey Saunders	ES DIRECTLY ☐ OTHER ☒
Janette Chrystall	6 Magee Rd Dipton	Janette Chrystall	ES DIRECTLY ☐ OTHER ☒
Olivia & Chrystall	6 maggee Rd Dipton	Olivia	ES DIRECTLY ☐ OTHER ☒
ANDREW CHRYSSTAL	onetragevelocity.net.co.nz	Andrew Chrystall	ES DIRECTLY ☐ OTHER ☒

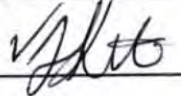
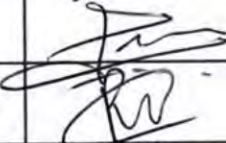
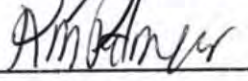
NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Denise Colvin	201 Egerton Rd Winton	<i>Denise Colvin</i>	ES DIRECTLY ☐ OTHER ☒
Shayne McIlwain	37 Talboys Drive	<i>Shayne McIlwain</i>	ES DIRECTLY ☐ OTHER ☒
Kate Barrie	1038 Lincolns Browns Rd	<i>K Barrie</i>	ES DIRECTLY ☐ OTHER ☒
Lisa Young	6 McCaughan St Browns	<i>Lisa Young</i>	ES DIRECTLY ☐ OTHER ☒
Owen Butcher	41 Egerton Road Winton	<i>Owen Butcher</i>	ES DIRECTLY ☐ OTHER ☒
Tim McCallum	111 West North Road Winton	<i>Tim McCallum</i>	ES DIRECTLY ☐ OTHER ☒
Nicki Hauri	Winton 45D Egerton Rd,	<i>Nicki Hauri</i>	ES DIRECTLY ☐ OTHER ☒
Ann Lambie	No. 2 R.D., Winton	<i>A. C. Lambie</i>	ES DIRECTLY ☐ OTHER ☒
Jasmine Hamilton	Asandale, RD3, Winton	<i>Jasmine Hamilton</i>	ES DIRECTLY ☐ OTHER ☒
Fleur Anderson	Caldor Rd RD2, Winton	<i>Fleur Anderson</i>	ES DIRECTLY ☐ OTHER ☒
Kerri Brand	180 Devereux Road, Winton	<i>K Brand</i>	ES DIRECTLY ☐ OTHER ☒
Robin Hazlett	369 Egerton Rd. Winton	<i>R Hazlett</i>	ES DIRECTLY ☐ OTHER ☒
Ray Hazlett	369 Egerton Rd. Winton	<i>R Hazlett</i>	ES DIRECTLY ☐ OTHER ☒
Kris Dale	36 Gunn St, Te Anau	<i>Kris Dale</i>	ES DIRECTLY ☐ OTHER ☒
Alison McFarlane	Drummond Rd 30 Taupo	<i>Alison McFarlane</i>	ES DIRECTLY ☐ OTHER ☒
Rachael Harding	2014 Winton Hedgehope highway	<i>Rachael Harding</i>	ES DIRECTLY ☐ OTHER ☒
			ES DIRECTLY ☐ OTHER ☐

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Sharyn Hamilton	Nick.sharyn@gmail.com	[Signature]	ES DIRECTLY ☐ OTHER ☒
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29-Apr-24

GROUNDWELL WESTERN SOUTHLAND PETITION TO ENVIRONMENT SOUTHLAND

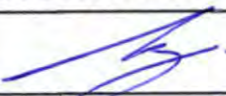
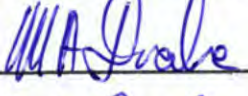
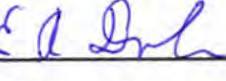
Environment Southland are changing their rating system from Land Value to Capital Value to pay for their LTP proposal. We as the community of Southland are requesting that the current Draft Long Term Plan proposed by Environment Southland be delayed for a period of no less than 12 months from this date being 29 April 2024. In these economic times the consequences of your proposal is not viable and have left many in the community concerned mentally and financially. We believe there are more economical, practical solutions to mitigate flooding in Southland. We ask that Environment Southland listen to the people within our region. We have the knowledge of the people who built the original flood protection and have been living alongside these rivers for generations. They know the rivers better than outside consultants. We request Environment Southland stop investing in modelling, consultants and scientists and go back to basics. Remove the gravel from the rivers!

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Valda Kito	259 Waimatuku South Rd RD 3 Riverbank		ES DIRECTLY ☐ OTHER ☒
Ningbar Ghising	ningbar@yahoo.co.nz		ES DIRECTLY ☐ OTHER ☒
PAINE	232 GREAT NORTH RD.		ES DIRECTLY ☐ OTHER ☒
Dafen Cameron	245 Redwood Rd		ES DIRECTLY ☐ OTHER ☒
L McLenaghan	54 Church		ES DIRECTLY ☐ OTHER ☒
Henry Palmer	327 Great North Road 22 Hillary St		ES DIRECTLY ☐ OTHER ☒

GROUNDSWELL WESTERN SOUTHLAND

PETITION TO ENVIRONMENT SOUTHLAND

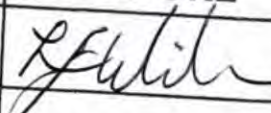
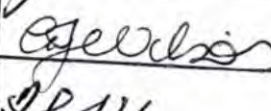
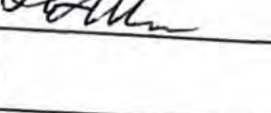
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Frasia Cilliers	frasia54@gmail.com		ES DIRECTLY ☐ OTHER ☒
Jason Paul	gofebush223@gmail.com		ES DIRECTLY ☐ OTHER ☒
Shayla Carran	shaylapec08@gmail.com		ES DIRECTLY ☐ OTHER ☒
M Wells	melanie-wells288@gmail.com		ES DIRECTLY ☐ OTHER ☒
Margaret Drake	emdrake@extra.co.nz		ES DIRECTLY ☐ OTHER ☒
Earl Drake	emdrake@extra.co.nz		ES DIRECTLY ☐ OTHER ☒

29-Apr-24

GROUNDWELL WESTERN SOUTHLAND PETITION TO ENVIRONMENT SOUTHLAND

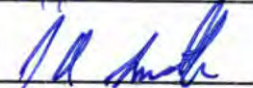
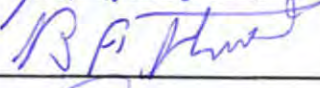
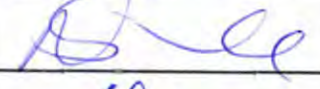
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Lester Wilson	wilsonlj52@gmail.com		ES DIRECTLY ☐ OTHER ☒
Gretchen Wilson	wilsongj7@gmail.com		ES DIRECTLY ☐ OTHER ☒
Faye Allen	1464 HUNDRED LINE RD EAST		ES DIRECTLY ☐ OTHER ☒
			ES DIRECTLY ☐ OTHER ☐
			ES DIRECTLY ☐ OTHER ☐
			ES DIRECTLY ☐ OTHER ☐

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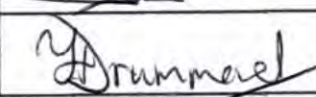
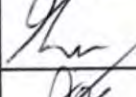
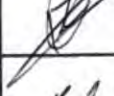
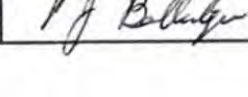
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Hayden Flannery	hayden.flannery@me.com		ES DIRECTLY ☐ OTHER ☒
John Smith	j.smith.winton@gmail		ES DIRECTLY ☐ OTHER ☒
Brent Stewart	617 Lynch Road		ES DIRECTLY ☐ OTHER ☒
Natasha Spittle	139 Stewart Road		ES DIRECTLY ☐ OTHER ☒
Joy Lynch	49 MacAndrew St		ES DIRECTLY ☐ OTHER ☒
Debbie Keon	55 Kauratford Road		ES DIRECTLY ☐ OTHER ☒

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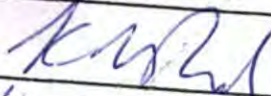
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Peter Drummond	2521 Winton Wreys Bush		ES DIRECTLY ☐ OTHER ☒
Fraser Drummond	2601 Winton Wreys Bush		ES DIRECTLY ☐ OTHER ☒
Timothy Klarwill	43 Regent st Wreys Bush		ES DIRECTLY ☐ OTHER ☒
Kevin Curtin	532 Wario Wreys Bush Road		ES DIRECTLY ☐ OTHER ☒
Ferdinand Ubes	108 Stewart road, Wreys Bush.		ES DIRECTLY ☐ OTHER ☒
Pete Ballentyne	76 Wairoa Creek Rd		ES DIRECTLY ☐ OTHER ☒

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
L.G. Smith	16 George St Otahutu		ES DIRECTLY ☐ OTHER ☒
K.W. Reed	51 Birchwood Rd, Ohai		ES DIRECTLY ☐ OTHER ☒
Mr H.M. Burford	159 Gap Road West Winton		ES DIRECTLY ☐ OTHER ☒
22 Mrs	40 Bluff Point Rd. Ohai		ES DIRECTLY ☐ OTHER ☒
L.R. GRIMSTRUP	5 LYNE ST.		ES DIRECTLY ☐ OTHER ☒
B SMART	4 Donnington Street OHAI		ES DIRECTLY ☐ OTHER ☒

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Thelma Frende	central.garage@xtra.co.nz	Thelma Frende	ES DIRECTLY ☐ OTHER ☒
Cheryl Kelly	cherylkelly987@gmail.com	Cheryl Kelly	ES DIRECTLY ☐ OTHER ☒
Germa Ross	hoppahopkins@gmail.com	Germa Ross	ES DIRECTLY ☐ OTHER ☒
JAN LOWREY	jlowrey@slingshot.co.nz	JAN LOWREY	ES DIRECTLY ☐ OTHER ☒
Tegan Racz	tegan.racz@hotmail.com	Tegan Racz	ES DIRECTLY ☐ OTHER ☒
IAN BONOS	LISMAN ST	IAN BONOS	ES DIRECTLY ☐ OTHER ☒

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
BRIAN KENNARD	1 YARROW ST NIGHTCAPS	B Kennard	ES DIRECTLY ☐ OTHER ☒
Karen Dwyerhoff	6 Wamphray Street	K Dwyerhoff	ES DIRECTLY ☐ OTHER ☒
Liz Montgomery	1250 Nightcaps-Otatau Rd	Liz Montgomery	ES DIRECTLY ☐ OTHER ☒
DALE THOMSON	20 HIGH ST NIGHTCAPS	D Thomson	ES DIRECTLY ☐ OTHER ☒
Colin Flaws	27 Sinclair Ave Ncaps	C Flaws	ES DIRECTLY ☐ OTHER ☒
Raymond Hunt	29 High St Nightcaps	R Hunt	ES DIRECTLY ☐ OTHER ☒

GROUNDWELL WESTERN SOUTHLAND

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Allan Brown	11 Swale ST Otoutau	Allan J Brown	ES DIRECTLY ☐ OTHER ☒
SRAIMIE Lynett	49 MACAUPAUA OTAUTAU	S F Lyall	ES DIRECTLY ☐ OTHER ☒
PETER Ripson	41 HARRY ST Otoutau	P.L. Ripson	ES DIRECTLY ☐ OTHER ☒
D Lelli	92 Slaughter House RD OTAUTAU	D Lelli	ES DIRECTLY ☐ OTHER ☒
BRYAN MILNE	41 ALDERLY STREET OTAUTAU	B W Milne	ES DIRECTLY ☐ OTHER ☒
			ES DIRECTLY ☐ OTHER ☐

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
ANITA KENNARD	1 YARROW ST. NIGHTCAPS	Anita Kennard	ES DIRECTLY ☐ OTHER ☒
PETE BAILLY	81 JIMMY HILL ST	[Signature]	ES DIRECTLY ☒ OTHER ☐
Ross Kingan	5 ETTRICK	[Signature]	ES DIRECTLY ☒ OTHER ☐
Shirley Hibcox	25 Osborne Tce	[Signature]	ES DIRECTLY ☐ OTHER ☒
Denise Mitchell	5 Benson Rd	[Signature]	ES DIRECTLY ☐ OTHER ☒
Allan Cosgrave	5 Benson Rd	[Signature]	ES DIRECTLY ☐ OTHER ☒

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Ross McKenzie	leicester-d@farmside.co.nz	C.R. McKenzie	ES DIRECTLY ☐ OTHER ☒
Joy McKenzie	leicester-d@farmside.co.nz	J.M. McKenzie	ES DIRECTLY ☐ OTHER ☒
Lyn Jones	joneslyn755@gmail.com	L Jones	ES DIRECTLY ☐ OTHER ☒
Ken Smith	251 Riverside Rd Oreti RD3 Winton	K Smith	ES DIRECTLY ☐ OTHER ☒
Barb Stuart	109 Mackenzie St Winton	B.E. Stuart	ES DIRECTLY ☐ OTHER ☒
Chrisy McKenzie	358 Gt Nt Rd	Cenck	ES DIRECTLY ☐ OTHER ☒

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Polly Minehan	paulineminehan@gmail.com	PA Minehan	ES DIRECTLY ☐ OTHER ☒
GARY CRINS	gocrins@xtra.co.nz	[Signature]	ES DIRECTLY ☐ OTHER ☒
DAVE SMITH	23A DURHAM ST	[Signature]	ES DIRECTLY ☐ OTHER ☒
Nillie Milne	119 Lady Barkly Rd	[Signature]	ES DIRECTLY ☐ OTHER ☒
Skop Holmes	12 Union St Winton	[Signature]	ES DIRECTLY ☐ OTHER ☒
Trudy Milne	Lady Barkly R.D.2 Winton	[Signature]	ES DIRECTLY ☐ OTHER ☒

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Desley Smith	smithdesley3@gmail.	p Smith	ES DIRECTLY ☐ OTHER ☒
Steven McDowan	stevenmcdowan.co.nz	f	ES DIRECTLY ☐ OTHER ☒
Kane Shuttleworth	kshuttleworth@xtra.co.nz	ks	ES DIRECTLY ☐ OTHER ☒
Hayden Morrison	10 Foster rd Thornbury	✓	ES DIRECTLY ☐ OTHER ☒
Grent Walker	6 Union St	GW	ES DIRECTLY ☐ OTHER ☒
			ES DIRECTLY ☐ OTHER ☐

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M. Baulter	mronald21@gmail.com	M. Baulter	ES DIRECTLY ☐ OTHER ☒
J. Clarke	agimclarke@gmail.com	J. Clarke	ES DIRECTLY ☐ OTHER ☒
A. DRUMMOND	34 Anne St Winton	A. Drummond	ES DIRECTLY ☐ OTHER ☒
Heather Coles	1685 Otatau-Nightcaps Rd	H. Coles	ES DIRECTLY ☐ OTHER ☒
Irish Cox	5 Racecourse Rd Winton	P. P. Cox	ES DIRECTLY ☐ OTHER ☒
Janice Coles	31 De Joux Rd Winton	Janice Coles	ES DIRECTLY ☐ OTHER ☒

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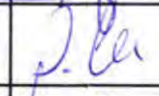
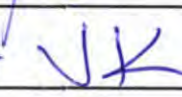
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Mairi Johnstone	29 Marsen Road.	Mairi Johnstone	ES DIRECTLY ☐ OTHER ☐
Michelle Cairns	67 Oconner Road	MC Cairns	ES DIRECTLY ☐ OTHER ☐
Karyn McNaught	702 Boundary Rd	Karyn McNaught	ES DIRECTLY ☐ OTHER ☐
Georgia Lowe	711 Lochiel Branksome Rd	Georgia Lowe	ES DIRECTLY ☐ OTHER ☒
Mark Sargent	31 Munro Road	Mark Sargent	ES DIRECTLY ☐ OTHER ☒
Ben Johnson	283 Drummmond	Ben Johnson	ES DIRECTLY ☐ OTHER ☒

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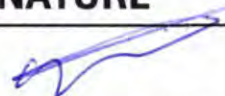
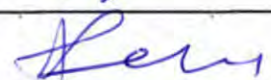
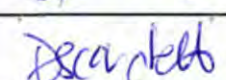
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Trina Mathieson	trinamm83@gmail.com		ES DIRECTLY ☐ OTHER ☒
Trish Kennedy	akpmg@hotmail.com	PK.	ES DIRECTLY ☐ OTHER ☒
Allan Kennedy	AK PM Kennedy @ Hotmail . Com		ES DIRECTLY ☐ OTHER ☒
Lindsay King	lking1069@gmail.com		ES DIRECTLY ☐ OTHER ☒
Prue Kennedy	prues.bluebug@gmail.com		ES DIRECTLY ☐ OTHER ☒
Kirk Kianen	ryk2010@hotmail.com		ES DIRECTLY ☐ OTHER ☒

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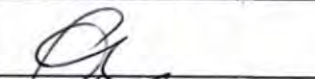
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Jeff Don	817 Hundred Line Road West		ES DIRECTLY ☐ OTHER ☒
Aisha Knight	16 Hamilton Street		ES DIRECTLY ☐ OTHER ☒
Darrelle Anne Scandrett	16 Breeze Rd.		ES DIRECTLY ☐ OTHER ☒
Ruth Dyer	174 Park St Winton		ES DIRECTLY ☐ OTHER ☒
Beg Ryan	bryan57@yahoo.co.nz		ES DIRECTLY ☐ OTHER ☒
Jordan Cook	cookdailys@gmail.com		ES DIRECTLY ☐ OTHER ☒

29-Apr-24

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Krista Hagen	7 Niven Road, Otatara		ES DIRECTLY ☐ OTHER ☒
Gillian Clark	42 Ritchie St Invercargill		ES DIRECTLY ☐ OTHER ☒
Chris Newton	19 Severn Street		ES DIRECTLY ☐ OTHER ☒
Warren MacDougall	23 Wellington Street		ES DIRECTLY ☐ OTHER ☒
Robbie Watkins	115 Rongotea Road, Invercargill		ES DIRECTLY ☐ OTHER ☒
Sharon Young	102 Invercargill Road, Invercargill		ES DIRECTLY ☐ OTHER ☒

NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
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GROUNDWELL WESTERN SOUTHLAND

PETITION TO ENVIRONMENT SOUTHLAND

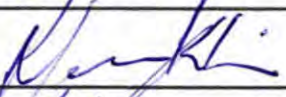
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Janet Willis	janet@rigstrength.com	JAWillis	ES DIRECTLY ☐ OTHER ☒
Sheryl Smith	—	Sheryl Smith	ES DIRECTLY ☐ OTHER ☒
Brianna Excel	brianna.Excel@hotmail.com	B. Excel	ES DIRECTLY ☐ OTHER ☒
Sharon Ladds	saladds@xtra.co.nz	Sharon Ladds	ES DIRECTLY ☐ OTHER ☒
Wynne's Rabbit	sharon.wynnis-rabbit.co.nz	Wynne's Rabbit	ES DIRECTLY ☐ OTHER ☒
M. Smith	hunte@xtra.co.nz	m.s.	ES DIRECTLY ☐ OTHER ☒

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
CRAWFORD MCGILLAN	22 CHERTER St		ES DIRECTLY ☐ OTHER ☒
PETE FRANKLIN	18 MOSSBART St		ES DIRECTLY ☐ OTHER ☒
Malcolm Keen	35 Rye St		ES DIRECTLY ☐ OTHER ☒
Vivian Davidson	72, Otatau Wreys Bush Rd	Viv Davidson	ES DIRECTLY ☐ OTHER ☒
Caroline Campbell	349 Papatotoa Rd, R.D. 1.		ES DIRECTLY ☐ OTHER ☒
Holly McDonald	565 OTATAU WREYSBUSH		ES DIRECTLY ☐ OTHER ☒

29-Apr-24

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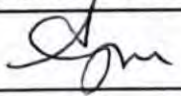
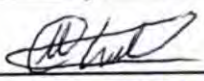
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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
David Rose	1210 Orero Fst Rose Fertidge	David Rose	ES DIRECTLY ☒ OTHER ☐
Bruce Robertson	duncraig @ farmside.co.nz	B Robertson	ES DIRECTLY ☒ OTHER ☐
MEGAN THOMAS	MeganThomas@hotmail.co.uk	Megan Thomas	ES DIRECTLY ☒ OTHER ☐
Donna Fraser	djfraser@the.co.nz	Donna Fraser	ES DIRECTLY ☐ OTHER ☐
Ben Sweeney	gpbjsweeney@gmail.com	Ben Sweeney	ES DIRECTLY ☒ OTHER ☐
Garry Sweeney	gpbjsweeney@gmail.com	Garry Sweeney	ES DIRECTLY ☒ OTHER ☐

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Anna McCleary	a.j.mccleary@hotmail.com		ES DIRECTLY ☐ OTHER ☒
Michelle Coombes	mitchcoombes@hotmail.com		ES DIRECTLY ☐ OTHER ☒
Karen Outchley	kakaposureshots@xtra.co.nz		ES DIRECTLY ☐ OTHER ☒
Adie + Ron Crispin	a.r.crispin2@gmail.com		ES DIRECTLY ☐ OTHER ☒
Wendy Smith	6 Brylstone St Edenolek		ES DIRECTLY ☐ OTHER ☒
Wendy Smith	wendyanne258@gmail.com		ES DIRECTLY ☐ OTHER ☒

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Lindsay Ross	Rossrailroader@gmail.com	L S Ross	ES DIRECTLY ☐ OTHER ☒
TAN WOODWARD	birchbush@xtra.co.nz	[Signature]	ES DIRECTLY ☐ OTHER ☒
Rob Willis	bobccat@outlook.co.nz	Reaw	ES DIRECTLY ☐ OTHER ☒
FRITS BRAMER	42 NORTHWOOD AVE, Invercargill	[Signature]	ES DIRECTLY ☐ OTHER ☒
Hazel Leckie	30 Bay Rd RD9 Invercargill	H Leckie	ES DIRECTLY ☐ OTHER ☒
Sharon Leckie	310 Bay Rd RD9 Invercargill	S Leckie	ES DIRECTLY ☐ OTHER ☒

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NAME	EMAIL OR STREET ADDRESS	SIGNATURE	HOW DID YOU HEAR ABOUT THE LTP
Karen Hogg	73 Crawford St.	[Signature]	ES DIRECTLY ☐ OTHER ☒
Carol Howden	14 Hardy St.	[Signature]	ES DIRECTLY ☐ OTHER ☒
Denice Patterson	39 Louisa St.	[Signature]	ES DIRECTLY ☐ OTHER ☒
Heather Hughes	46 Avenal St.	[Signature]	ES DIRECTLY ☐ OTHER ☒
Angela Castle	66 Kew Road	[Signature]	ES DIRECTLY ☒ OTHER ☐
Jo Keppel	85 Avenal St.	[Signature]	ES DIRECTLY ☐ OTHER ☒