
**ORDINARY MEETING
OF
PŪRORO MAHEREHERE | ANNUAL PLAN/LONG-TERM PLAN
COMMITTEE
AGENDA**

Time: 12:30pm
Date: Monday, 23 May 2022
Venue: Ngake (16.09)
Level 16, Tahiwi
113 The Terrace
Wellington

MEMBERSHIP

Mayor Foster (Deputy Chair)
Deputy Mayor Free
Councillor Calvert
Councillor Condie
Councillor Day
Councillor Fitzsimons
Councillor Foon
Liz Kelly
Councillor Matthews (Chair)
Councillor O'Neill
Councillor Pannett
Councillor Paul
Councillor Rush
Councillor Woolf
Councillor Young

Have your say!

You can make a short presentation to the Councillors, Committee members, Subcommittee members or Community Board members at this meeting. Please let us know by noon the working day before the meeting. You can do this either by phoning 04-803-8337, emailing public.participation@wcc.govt.nz or writing to Democracy Services, Wellington City Council, PO Box 2199, Wellington, giving your name, phone number, and the issue you would like to talk about. All Council and committee meetings are livestreamed on our YouTube page. This includes any public participation at the meeting.

AREA OF FOCUS

The Long-term Plan and Annual Plan give effect to the strategic direction and outcomes set by the Strategy and Policy Committee by setting levels of service and budget.

The Committee is responsible for overseeing the development of the draft Annual Plan and Long-term Plan for consultation, determining the scope and approach of any consultation and engagement required, and recommending the final Long-term Plan and Annual Plans to the Council.

To read the full delegations of this committee, please visit wellington.govt.nz/meetings.

Quorum: 9 members

TABLE OF CONTENTS
23 MAY 2022

Business	Page No.
1. Meeting Conduct	5
1.1 Karakia	5
1.2 Apologies	5
1.3 Conflict of Interest Declarations	5
1.4 Confirmation of Minutes	5
1.5 Items not on the Agenda	5
1.6 Public Participation	6
2. General Business	7
2.1 Annual Plan and Long-term Plan Amendment Hearings	7

1. Meeting Conduct

1.1 Karakia

The Chairperson will open the meeting with a karakia.

Whakataka te hau ki te uru, Whakataka te hau ki te tonga. Kia mākinakina ki uta, Kia mātaratara ki tai. E hī ake ana te atākura. He tio, he huka, he hauhū. Tihei Mauri Ora!	Cease oh winds of the west and of the south Let the bracing breezes flow, over the land and the sea. Let the red-tipped dawn come with a sharpened edge, a touch of frost, a promise of a glorious day
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At the appropriate time, the following karakia will be read to close the meeting.

Unuhia, unuhia, unuhia ki te uru tapu nui Kia wātea, kia māmā, te ngākau, te tinana, te wairua I te ara takatū Koia rā e Rongo, whakairia ake ki runga Kia wātea, kia wātea Āe rā, kua wātea!	Draw on, draw on Draw on the supreme sacredness To clear, to free the heart, the body and the spirit of mankind Oh Rongo, above (symbol of peace) Let this all be done in unity
--	--

1.2 Apologies

The Chairperson invites notice from members of apologies, including apologies for lateness and early departure from the meeting, where leave of absence has not previously been granted.

1.3 Conflict of Interest Declarations

Members are reminded of the need to be vigilant to stand aside from decision making when a conflict arises between their role as a member and any private or other external interest they might have.

1.4 Confirmation of Minutes

The minutes of the meeting held on 17 May 2022 will be put to the Pūroro Maherehere | Annual Plan/Long-Term Plan Committee for confirmation.

1.5 Items not on the Agenda

The Chairperson will give notice of items not on the agenda as follows.

Matters Requiring Urgent Attention as Determined by Resolution of the Pūroro Maherehere | Annual Plan/Long-Term Plan Committee.

The Chairperson shall state to the meeting:

-
1. The reason why the item is not on the agenda; and
 2. The reason why discussion of the item cannot be delayed until a subsequent meeting.

The item may be allowed onto the agenda by resolution of the Pūroro Maherehere | Annual Plan/Long-Term Plan Committee.

Minor Matters relating to the General Business of the Pūroro Maherehere | Annual Plan/Long-Term Plan Committee.

The Chairperson shall state to the meeting that the item will be discussed, but no resolution, decision, or recommendation may be made in respect of the item except to refer it to a subsequent meeting of the Pūroro Maherehere | Annual Plan/Long-Term Plan Committee for further discussion.

1.6 Public Participation

A maximum of 60 minutes is set aside for public participation at the commencement of any meeting of the Council or committee that is open to the public. Under Standing Order 31.2 a written, oral or electronic application to address the meeting setting forth the subject, is required to be lodged with the Chief Executive by 12.00 noon of the working day prior to the meeting concerned, and subsequently approved by the Chairperson.

Requests for public participation can be sent by email to public.participation@wcc.govt.nz, by post to Democracy Services, Wellington City Council, PO Box 2199, Wellington, or by phone at 04 803 8334, giving the requester's name, phone number and the issue to be raised.

2. General Business

ANNUAL PLAN AND LONG-TERM PLAN AMENDMENT HEARINGS

Kōrero taunaki | Summary of considerations

Purpose

1. This report to the Pūroro Maherehere | Annual Plan/Long-Term Plan Committee asks that panel members recognise the speakers who will be speaking to their submissions regarding the 2022/23 Annual Plan and Long-term Plan Amendment consultation.

Strategic alignment with community wellbeing outcomes and priority areas

Aligns with the following strategies and priority areas:

- | | |
|--|---|
| Strategic alignment with priority objective areas from Long-term Plan 2021–2031 | <input type="checkbox"/> Sustainable, natural eco city |
| | <input type="checkbox"/> People friendly, compact, safe and accessible capital city |
| | <input type="checkbox"/> Innovative, inclusive and creative city |
| | <input type="checkbox"/> Dynamic and sustainable economy |
| | <input type="checkbox"/> Functioning, resilient and reliable three waters infrastructure |
| | <input type="checkbox"/> Affordable, resilient and safe place to live |
| | <input type="checkbox"/> Safe, resilient and reliable core transport infrastructure network |
| | <input type="checkbox"/> Fit-for-purpose community, creative and cultural spaces |
| | <input type="checkbox"/> Accelerating zero-carbon and waste-free transition |
| | <input type="checkbox"/> Strong partnerships with mana whenua |

Relevant Previous decisions

On Wednesday 13 April 2022, the Pūroro Maherehere | Annual Plan/Long-term Plan Committee adopted the 2022/23 Annual Plan and Long-term Plan Amendment Consultation Document, and noted that the formal consultation period was 14 April 2022 to 15 May 2022.

Financial considerations

- | | | |
|---|--|---|
| <input checked="" type="checkbox"/> Nil | <input type="checkbox"/> Budgetary provision in Annual Plan / Long-term Plan | <input type="checkbox"/> Unbudgeted \$X |
|---|--|---|

Risk

- | | | | |
|---|---------------------------------|-------------------------------|----------------------------------|
| <input checked="" type="checkbox"/> Low | <input type="checkbox"/> Medium | <input type="checkbox"/> High | <input type="checkbox"/> Extreme |
|---|---------------------------------|-------------------------------|----------------------------------|

Author	Hedi Mueller, Senior Democracy Advisor
Authoriser	Stephen McArthur, Chief Strategy & Governance Officer

Taunakitanga | Officers' Recommendations

Officers recommend the following motion

That the Pūroro Maherehere | Annual Plan/Long-Term Plan Committee:

- 1) Receive the information.
- 2) Hear the oral submitters and thank them for their submissions.

Takenga mai | Background

2. Wellington City Council consulted the community on the 2022/23 Annual Plan and 2021/2031 Long-Term Plan Amendment from 14 April 2022 to 15 May 2022.
3. Additional submissions were accepted through 18 May 2022.

Kōrerorero | Discussion

4. A document comprising all of the speakers' submissions will be provided to committee members and published on the wellington.govt.nz website.
5. The submissions of the speakers scheduled for this hearing are included as Attachment 1.

Ngā mahinga e whai ake nei

Next actions

6. Additional hearings are scheduled for Wednesday 25 May 2022, and that agenda will be published on Friday 20 May 2022.
7. Deliberations are scheduled for 1 June 2022, and adoption is scheduled for 30 June 2022. The full submission document will be published alongside the 1 June 2002 meeting agenda.

Attachments

Attachment 1. Speakers Submissions



Respondent No: 32

Login: Registered

Responded At: Apr 19, 2022 11:31:00 am

Last Seen: Apr 18, 2022 23:11:38 pm

- Q1. **Full name:** Stephen Fullelove
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)** I am a Wellington City Council ratepayer
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Establish a Community Housing Provider
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** Don't know
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** Community Trust
- Q11. **Are there comments you would like to make about the changes to city housing options?**
Option B & C in question 8 are the same.
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** Don't know
- Q13. **Are there comments you would like to make about the landfill options?**
not answered
- Q14. **Rescheduling of the timing of some projects to recognise market and supplier constraints** Support

Q15. **Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.** Do not support

Q16. **A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.** Neutral don't know

Q17. **Increasing encroachment licence fees to better reflect their value** Do not support

Q18. **Additional funding for a full upgrade to Khandallah summer pool** Support

Q19. **Removal of all library charges to remove barriers to accessing council libraries** Support

Q20. **Overall, do you support the proposed budget?** Don't know

Q21. **Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?**

My main opposition is to DOUBLING (100% increase) in Encroachment fees. The fact that land and house prices have risen does not mean people have more money in their pocket. Any gains only come to fruition when the property is sold - so all you'll do is drive people to sell and move away if they can't afford to live there. On top of Petrol price increases, food price increase and the general inflationary environment we live in currently the Council have suddenly decided they are not making market rate economic return on some assets. So with no consideration for the user will put it right in one hit in the middle of a cost of living crisis. Where else have you seen prices double in one go? It's insane! And indicative of the Councils lack of empathy and understanding of personal situations let alone showing how not to run a business. The Council don't listen and pay lip service to 'consultations' e.g. the almost overwhelming opposition to parking fee increases and times they are paid made no difference (and now there has been some revision). The Council seems unable to operate in a cohesive manner. Councilors all have their pet projects and don't operate to the benefit of the people who they represent.

Q22. **You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)** not answered



Respondent No: 337

Login: Registered

Responded At: May 04, 2022 22:31:38 pm

Last Seen: May 04, 2022 10:24:11 am

- Q1. **Full name:** David Bruce Hamill
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Establish a Community Housing Provider
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** Option B: Leasehold CHP with broad responsibilities
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** Community Trust
- Q11. **Are there comments you would like to make about the changes to city housing options?**
I see the advantages of a CHP and think they may outweigh the disadvantages provided appropriate services surround the social housing provision, however, I want to talk in an oral submission about the ongoing (even exacerbated problem of inequality of affordability over the short (even medium) term
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** not answered
- Q13. **Are there comments you would like to make about the landfill options?**
not answered

Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints	not answered
Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	not answered
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	not answered
Q17. Increasing encroachment licence fees to better reflect their value	not answered
Q18. Additional funding for a full upgrade to Khandallah summer pool	not answered
Q19. Removal of all library charges to remove barriers to accessing council libraries	not answered
Q20. Overall, do you support the proposed budget?	not answered
Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?	not answered
Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)	not answered

Full name

Pamela Miria Finny McConchie

Phone number:

[REDACTED]

Are you making this submission as an individual or on behalf of an organisation?

Individual

Are you a City Housing tenant?

No

What is your connection to Wellington? (tick all that apply)

- I am a Wellington City Council ratepayer
 - I live in Wellington
 - I work in Wellington
-

Do you wish to speak to Councillors about your submission at an Oral Forum?

Yes

Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider

Establish a Community Housing Provider

If the Council did establish a Community Housing Provider, which option do you support?

Option A: Asset-owning CHP with broad responsibilities

If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?

Company or limited partnership

The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?

Waste to energy incineration

Are there comments you would like to make about the landfill options?

Sustainable and forward thinking regional facility

Rescheduling of the timing of some projects to recognise market and supplier constraints

Support

Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.

Support

A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.

Do not support

Increasing encroachment licence fees to better reflect their value

Do not support

Additional funding for a full upgrade to Khandallah summer pool

Support

Removal of all library charges to remove barriers to accessing council libraries

Support




Overall, do you support the proposed budget?

I oppose the proposed budget

Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?

See attached

You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)

Proposed Encroachment Policy

I do not support the proposed increases in Encroachment Fees for several reasons.

Principally, I do not support the increase because the proposal is based on the incorrect assumption that the land should be subject to 'market forces'. Because of the size, shape, and location of the land it only has value to the adjacent property. Consequently, if the land subject to the encroachment fee was 'on the market', there would be only one party with a potential interest.

The fact that the land is held by WCC, and not the adjacent landowner, is the result of the original and overly conservative planning considerations and boundaries at that time. If the same developments and subdivisions were made today, the land subject to the encroachment would most likely be part of the adjacent property.

To charge market rentals based on the value of the adjacent property values also implies that the Encroachment Fee provides full property rights over this land. It does not, and the Encroachment Agreement makes this very clear. In fact, the licence holder has extremely limited rights in the land, just a right to occupy at the will of Council. All rights are still held by Council.

Since the land subject to the encroachment has value to only one person i.e., the owner of the adjacent land, there is no 'market' for the land. Therefore, rather than the land being valued at the same rate as the adjacent property, the land has limited value because of its extremely limited use. The land in question also has no actual or practical value to the Council which is why it was possible to obtain an encroachment.

Council also accrues considerable practical and financial benefit from the encroachment. All maintenance and weed control are undertaken by the encroachment holder. The encroachment also potentially increases the value of the adjacent property from which the Council therefore receives greater rates revenue. Finally, in most cases the encroachment facilitates off-street parking which improves traffic flow and road safety.

The proposed policy is also counter to the principle of natural justice, which underpins all planning and legal processes. Many of those with encroachments entered into the agreement based on the situation at the time. They have made significant financial and practical decisions and investments on that situation. Had the proposed policy changes been present when they made those decisions, it is highly likely that a different decision would have been made. To apply the proposed policy change essentially retrospectively is unfair and in my opinion immoral and unethical.

For a policy with such significant implications, both financial and practical, to many residents and ratepayers, the consultation and opportunities for discussion and debate have been extremely poor. While the changes were presented in a letter dated 7 April, I only received the first page. The letter I received was missing all the material on making a submission. I do not believe that I was the only person to receive such a letter and therefore lack of notification. When this was pointed out to Council staff, their blasé response was that the information was available from other sources and therefore ‘it didn’t matter’! It is therefore highly likely that many potentially effected parties have not been notified of the implications of the proposed policy.

With regard to the specific policy suggestions:

- Since there has been no change in the ‘service’, or level of service, provided by the Encroachment Fee it is difficult to see why the Administration Fee has to double. The proposed rate of increase is several times the increase in rates (which is already exorbitant) and the rate of inflation. One can only assume that the increase is required to meet the administration costs within WCC. This reflects unreasonable inefficiency and wastage.
- The proposal to link the Encroachment Fee to the property value is not consistent either with ‘market forces’ or natural justice for the reasons discussed earlier. There is no market for the land covered by these Encroachments. The land has no value to Council and the only potential user is the adjacent landowner.
- The size, shape, location, and other characteristics of the land invariably means that it is only fit for a single purpose, that to which it is currently being used.
- Also, as discussed, the Council is already receiving revenue and avoiding costs through the existing encroachment.
- The shift to market rates would be a dramatic move away from past practices and the environment when decisions regarding the encroachment were initially made. The holder of the encroachment is now severely constrained regarding options should the fee rise to such exorbitant levels. They are essentially trapped within a situation they cannot avoid or manage. They would have no practical option but to pay the suggested fee. For those on fixed or limited incomes, this could have a catastrophic impact on their lives. Again, I believe that this is both amoral and unethical.
- The draconian and monopolistic policy proposed will invariably result in considerable hardship for persons who no longer have any options, apart from abandoning any structure on the encroachment. The ‘return’ of the land to Council, however, would impose significant costs, and have a range of adverse environmental effects, on council and the community.

Options

1. Increase the current encroachment fee in line with the rates increase, not by 100%. A policy could be adopted that would see this happen on an annual basis to avoid the need for quantum jumps in the fee as proposed currently.
2. Any move to market rates should only apply to new encroachments, or changes to an encroachment, when the adjacent landowner can assess fully the longer-term implications of the decisions they are making. The change could also be implemented when a property was sold for the same reasons i.e., the party is fully informed of the cost implications of having an encroachment attached to the property.
3. Existing encroachment holders should continue to use the land under the same conditions as at present but subject to Option 1 above.
4. If the Council wishes to obtain greater revenue from the 'waste' land covered by these encroachments, it should develop a process whereby the land could be purchased by the adjacent landowner. Such a system, however, must be simple and transparent and provide the encroachment holder with some surety that the sale and transfer will occur before they embark on the process.

Council should not sell the land at 'market rates' since, as outlined above, there is no market. The only potential buyer is the adjacent landowner. The land could be sold pro rata at the land value of the adjacent property, not the capital value. To use the capital value would be both unrealistic and unfair.

When I explored the option of purchasing the land covered by an encroachment on my property 20+ years ago, I had to meet all the costs of survey, and then apply to purchase the land with no guarantee of being successful. The 'risk' inherent in such a process was so great that I abandoned the process.

The sale of the land in this manner would provide an immediate revenue to Council. It would also remove any responsibility for the land and its administration from Council.

I would like to meet with councillors on this matter. I believe that it is critical that councillors understand fully the errors, implications, and unfairness inherent in the proposed policy.

Yours sincerely



Pamela Miria Finny McConchie



Respondent No: 560

Login: Registered

Responded At: May 13, 2022 11:24:28 am

Last Seen: May 12, 2022 23:05:48 pm

- Q1. **Full name:** Gerard Daniel O'Connell
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Organisation
- Q4. **Please name your organisation** Body Corp 428921
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)** I am a Wellington City Council ratepayer
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** not answered
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** not answered
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** not answered
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** No residual waste facility in Wellington City
- Q13. **Are there comments you would like to make about the landfill options?**
I have a written submission I would like to present.
- Q14. **Rescheduling of the timing of some projects to recognise market and supplier constraints** not answered

Q15. **Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.** not answered

Q16. **A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.** not answered

Q17. **Increasing encroachment licence fees to better reflect their value** not answered

Q18. **Additional funding for a full upgrade to Khandallah summer pool** not answered

Q19. **Removal of all library charges to remove barriers to accessing council libraries** not answered

Q20. **Overall, do you support the proposed budget?** not answered

Q21. **Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?**

not answered

Q22. **You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)**

[REDACTED]

SUBMISSION

My name is Ged O'Connell, I am a resident of Rarangi Way and Chairperson of Body Corp 428921. BC 428921 comprises 15 Residential Units and is located on Happy Valley Road and part of Rarangi Way.

We submit the following comments on the Annual Plan Issue 2:

The Future of the Southern Landfill:

Summary

We seek closure of the Southern Landfill ASAP with a deadline of the end 2026. And support Option 3. It is an abomination to have a Dump in the City environment, that creates dust, dirt, rubbish and contamination with large vehicles using city and residential streets to access it.

1. Waste to Energy (Incinerator)

This is an unrealistic option as it is unproven in the NZ environment: It is also likely to exacerbate many of the unacceptable problems currently experienced by the residents of the Owhiro Bay, Brookland area's, as rubbish and more of it will be brought into the area.

2. No Residual Waste Facility in Wellington City

There are very good reasons for closing the landfill and our residents are strongly in favour of this option.

Some of the issues are;

- Heavy and increasing traffic causes pollution,dirt,noise and endangers cyclists and pedestrians.
- Vehicles travel through the City, Brooklyn, Island Bay, the South Coast and Owhiro Bay.
- The increasing population around the area makes it City suburb, unlike the sparse out-of-town settlement it was when the landfill was first created
- Landfills are no longer seen as the solution to waste and are unacceptable as part of a city environment..
- The Dump encourages vermin and pests.
- Affects the stream. Rubbish blows into Carey's stream and Hape Stream.
- Rubbish and pollutants get into Owhiro Stream and flow into the Marine reserve.
- Residents are often affected by unpleasant smells.
- Greenhouse gas emissions are only partly captured.
- Happy Valley Park Car park is used by many as an axillary Dump. *
- Dump customers leave rubbish skips there for days at a time.
- Other contractors use it as a transition area leaving trailers as they visit the DUMP.
- Contractors hose down their equipment in the car-park.
- Its general unkempt state and the high cost of tip fees, leads to the dumping rubbish in the area both, domestic and commercial.

**We acknowledge the WCC is working on the Happy Valley Park Carpark issues and is making some progress.*

Closure is something our community strongly supports and urges the council to work towards.

.

Plan for the other 2 landfills.

We submit the other two landfills should be closed as soon as the Council can legally do so. The possibility of creating a transfer station for the use of Residential customers should be investigated.

We note that the Christchurch City Council moved their Landfill from the City environs some years ago. They purchased a Valley site some 50/60 kilometers from the city prepared it and now truck all their rubbish.

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Respondent No: 692

Login: Registered

Responded At: May 15, 2022 15:48:36 pm

Last Seen: May 15, 2022 03:39:04 am

- Q1. **Full name:** Alex Gray
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Establish a Community Housing Provider
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** Don't know
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** Community Trust
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** New landfill on top of the existing landfill (piggyback option)

Q13. **Are there comments you would like to make about the landfill options?**

Although I live in Brooklyn I accept the need for a landfill and extending the southern landfill is the best option. But why is Council proposing to spend \$22 Million next financial year on sludge minimisation when the current consent does not expire until 2026. Council spent \$8 Million repairing the current sludge lines and should continue to use these pipes as long as possible.

Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints	Support
Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	Support
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	Do not support
Q17. Increasing encroachment licence fees to better reflect their value	Neutral don't know
Q18. Additional funding for a full upgrade to Khandallah summer pool	Do not support
Q19. Removal of all library charges to remove barriers to accessing council libraries	Support
Q20. Overall, do you support the proposed budget?	I oppose the proposed budget
Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?	
<p>The OPEX budget is overspent by 43% and the CAPEX budget by 11%. What is the point of having a long term plan if Council does not adhere to it. If this was a private company the management team would be required to meet the budget or resign.</p>	
Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)	not answered



Respondent No: 648

Login: Registered

Responded At: May 14, 2022 22:27:56 pm

Last Seen: May 14, 2022 04:57:22 am

- Q1. **Full name:** Mary Tapp
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)** I am a Wellington City Council ratepayer
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** None of these options
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** not answered
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** not answered
- Q11. **Are there comments you would like to make about the changes to city housing options?**
Seek Government funding for the shortfall - WCC has been propping up Kaianga Ora for decades.
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** New landfill on top of the existing landfill (piggyback option)
- Q13. **Are there comments you would like to make about the landfill options?**
not answered
- Q14. **Rescheduling of the timing of some projects to recognise market and supplier constraints** Support

Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	Support
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	Do not support
Q17. Increasing encroachment licence fees to better reflect their value	Do not support
Q18. Additional funding for a full upgrade to Khandallah summer pool	Do not support
Q19. Removal of all library charges to remove barriers to accessing council libraries	Support
Q20. Overall, do you support the proposed budget?	I oppose the proposed budget
Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?	
Yes. Remove the increase in encroachment licences - see supporting information. Stop spending on area's that are not core business.	
Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)	<div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div>

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

RE: Submission -100% fee hike for 'land of no use to anyone' encroachment licence

This letter is to advise that we strongly disagree with the proposal to increase encroachment fees. This is clearly a money grab based on disingenuous or misunderstood reasons for the basis of the proposed increase. In this letter we will demonstrate that Wellington City Council is guilty of materially aiding and abetting unprecedented land value increases in Wellington over the last 10, 20, 30 years, and are looking as a profiteer to cash in on rates and encroachments. This letter sets out contrary arguments to those proposed in your letter 7th April 2022.

In your letter to us you advise:

1. "The current encroachment fee is low."
2. "The councils Road Encroachment and sale policydoes not reflect the significantly increased land value.."
3. Unbelievable "100% increase in encroachments to support general rate increase"
4. Considering "setting the road encroachment fee based on individual rateable land value of adjoining property".

These arguments were tried in 2011 and failed because there was no support. These same arguments are as detestably unfair then as they are now.

"The current encroachment fee is too low"

Compared with what and whose asset? What is the basis for this argument, as it means nothing without taking a balanced view. The talk is disturbingly business like where this council is not a business and should not be run like one. "Economic return" is wording we should never see from our councils and it suggests profit. WCC is actually charged to serve the public in a balanced fashion. It must be sensitive to observe when the overall value of private behaviour is driving a public benefit and additional amenity for the city as a whole. i.e. Don't rip off the people who continue to maintain the amenity to beautify the city and keep more parked cars off the road.

The new fee appears to have zero evidence of a balanced account for these matters:

- The assets on the encroachments that generate the land value do not belong to WCC. The relationship is interdependent and any fee must represent this fact. WCC are not the generators of value in this sense. Private owners are. This is a quid pro quo deal and WCC are deliberately turning a blind eye to a social handshake made in the past.
- There is no actual comparative "market rate" for the use of road reserve and the way in which encroachments work has nothing to do with the wider housing market and private land value. So any measurement based on private land value which is based on land scarcity (see below) is flawed and unfair.

- Land owners are at risk of having their assets turned into bus stops. This land has no security or protections and a markedly different risk profile, so therefore cannot be compared with the current housing market benchmarking and must be devalued accordingly within the mix.
- Other public (neighbours, businesses visitors etc) that don't have off street parking are profiting from our cars not parking on the road. By extension the city of Wellington (aka ratepayers generally) profit from this valued amenity generated by private actions. We understand that historically WCC actively encouraged building on road reserve and to maximise the use when building infrastructure. By arbitrarily inflating the value of fees, this appears at best deceitful.
- Land owners are buying and selling in the same market so any argument that suggests that land owners are profiting from road reserve land use with their assets are flawed. The same amenity will cost the same elsewhere when people buy or sell. There is no widespread profiteering or advantage going on and so these are wild assumptions. Licence holders will be additionally out of pocket whatever WCC charge.

2. "The councils Road Encroachment and sale policydoes not reflect the significantly increased land value.."

We agree that the council's Road Encroachment and sale policy needs to be reviewed in light of artificial increase of land value and the fee must be detached from land values. It is clear that land values are increasing due to internal and external factors that are not natural. A fairer assessment should be heavily focussed on CPI and comparative wage increases. This is a fair value based on what people can afford much like the rental market. Elderly are at risk of poor outcomes as they also are on fixed incomes and this approach disproportionately affects them. Below are our thoughts as to why the housing market must be detached from any calculation. It is clear that WCC like other T1 councils have an embarrassing conflict of interest:

- It is clear from central government assessment (refer HUD and Ministry for Environment) that Territorial Authorities in T1 councils in particular have systematically caused the environmental structural issues that create the conditions for unaffordable housing.
- Documented evidence is incontrovertible that the RMA is flawed and that councils have been implicit through their planning policies in strangling the supply of land and its full use. By extension, this has increased the cost of land dramatically to which your encroachment policies are imperfectly based. WCC is the proverbial fox looking after the hen house. This behaviour is significant and undermines WCCs credibility to charge based on market land values. It cannot be tolerated now that it is known.
- To top it off central government's quantitative easing was out of all home owners' control and this has fed into WCC land use policy creating the perfect storm of exponential unaffordability. Encroachment licence holders cannot be unfairly held responsible for this problem. As addressed above there is little advantage for increase in house value buying and selling in the same market for the same assets.
- Housing affordability in New Zealand has deteriorated to the worst level on record, with the average property worth 8.8 times the average income. WCC policy is adding to this due to planning policy. OECD advises that this ratio should be 3 or less to be considered affordable and unsustainable. WCC along with other government policy appears to have been asleep at the wheel for at least the last 20 years when you refer to this data. Yet WCC planning policy is more than partially to blame for this incredible rise in land value that has done severe

damage to our society. Where is the credible mandate for WCC to even mention rising land values?

2021 Reference on housing affordability (please look carefully and understand WCC's relationship to land price in this city):

https://ecoprofile.infometrics.co.nz/Wellington%2BCity/StandardOfLiving/Housing_Affordability#:~:text=We%20present%20a%20housing%20affordability,which%20indicates%20lower%20housing%20affordability.

3. Unbelievable “100% increase in encroachments to support general rate increase”

The proposed increases would unfairly target encroachment licence holders when other rate payers benefit.

- As discussed above a lot of encroachment in Wellington is for off street parking where there is not much available. In other cities and even other newer suburbs in Wellington on street car parking is readily available. It is already unfair that we have to expend extra when others pay no more for this amenity. There is already an imbalance and rate payers are benefiting from private owners. Encroachment fee Increases well beyond affordability should not be funding the general rate pool.
- WCC is a monopoly and must charge a fair rate. This has been established previously within WCC's specific encroachment policy and is changed every 3 years. Since the agreement in 2011 the fee rises have been in the order of 3-5%. The last one was 3.5%. 100% is completely inconsistent with the natural history of fee increases and not consistent with agreed policy.

4. Considering “setting the road encroachment fee based on individual rateable land value of adjoining property”.

WCC need to stop right now. There should not be any consideration of setting the road encroachment fee based on individual rateable land value of adjoining property.

- As WCC are proven to be complicit in creating problems for land availability, and planning rules that deny housing affordability and hence artificial land value increase over the last 30 years, it is problematic for WCC to entertain this notion. There is a conflict of interest that the Ombudsman will need to attend to if this is proposed beyond consideration.

Moving forward and the future of Wellington:

We are unsure why WCC are so insistent on increasing the value of encroachment fees. This provides a disincentive to continue maintaining garaging, existing car pad infrastructure and road reserve beautification. It will certainly curb further private development of use of this land which has no other use to anyone else. With the National Policy Statement on Urban Development and now MDRS, there are no more mandates allowed for carparking within T1 planning policy. WCC would be wise to encourage further use of road reserve land for off street parking. Why are you proposing to overcharge?

Buying land:

We tried to buy land off WCC many years ago to avoid this very risk, but the process was so obstructive and, costly we gave up. That was over 20 years ago. We see this proposal to sharply increase the fee as entrapment. The purchase of road reserve land has long been unsustainable.

Conclusion

We are happy to pay a reasonable fee which is consistent with the fees we have paid over the past 20 years – these increase on a regular basis but by 3-5%. It does not seem fair to be charging in excess of 100% more for land which WCC will never use/can never use due to topography. CPI is a fairer rate increase that reflects the overall public amenity financial value and affordability. Leave land value out of the equation as the rapid increase in value over and above historic averages is tainted by WCC planning interventions over the last 30 years. We strongly object to paying an unfair fee beyond what we understand is a reciprocating value arrangement with WCC.

Mary Tapp



Respondent No: 577

Login: Registered

Responded At: May 13, 2022 13:39:36 pm

Last Seen: May 13, 2022 01:34:50 am

- Q1. **Full name:** Aaron Gilmore
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
I own a business in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Establish a Community Housing Provider
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** Option A: Asset-owning CHP with broad responsibilities
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** Community Trust
- Q11. **Are there comments you would like to make about the changes to city housing options?**
You have to wonder whether the WCC are genius being the second largest social housing provider in NZ or really are not. The latter seems more likely. It is a historical situation that time has come to change.
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** Waste to energy incineration
- Q13. **Are there comments you would like to make about the landfill options?**
A waste to energy option may not be economic in the short run but should at least be looked at more

Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints	Support
Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	Support
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	Do not support
Q17. Increasing encroachment licence fees to better reflect their value	Support
Q18. Additional funding for a full upgrade to Khandallah summer pool	Neutral don't know
Q19. Removal of all library charges to remove barriers to accessing council libraries	Do not support
Q20. Overall, do you support the proposed budget?	I support the proposed budget
Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?	
The budget is not perfect but it with some small changes it would be better	
Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)	not answered

Full name

Peter Steel

Phone number:



Are you making this submission as an individual or on behalf of an organisation?

Individual

Do you wish to speak to Councillors about your submission at an Oral Forum?

Yes

Increasing encroachment licence fees to better reflect their value

Do not support

Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?

See attached

You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)

Encroachment Submission

A discretionary decision by a Council to impose an increase 100% in price for any charge which the counterparty has no option about paying is simply an abuse of power.

You are seeking feedback on the Council's proposal to increase annual rental fees for road encroachments. You have asserted that these have not increased in recent years.

My submission will detail how this is an abuse of power and how the Council has based this proposal on incorrect information.

Our Situation

We have a garage on encroachment on [REDACTED] It is our only off-street parking. [REDACTED] is now designated as a future cycleway. Contractors for construction of this cycleway are currently being sought by Council. All kerbside parking will have to be removed from this 7-metre-wide roadway to construct the cycleway. At that stage, our parking on this area of road reserve and encroachment will be our only potential overnight parking within a distance of over 400 metres. [REDACTED] was added to the Cycle network without notice at a late stage and there has been no ability for affected residents to have any input to this Council decision.

Council's Annual Plan Consultation Document

The Council's Consultation Document says:

*"We plan to increase **encroachment licence fees** to put them more in line with the value of the land being leased. Fees would increase from \$267 for a 20m2 encroachment to \$533. Encroachment licence fees have not increased for some time, which will mean large increases for some holders. But this is the right approach to ensure we are getting fair value from our assets. Changes to encroachment fees would result in an additional \$1.5m council revenue, offsetting an increase approximately of 0.4% rates."*

In addition, the letter sent to encroachment holders asserts that this increase will also be *"fulfilling the Council's statutory obligation under the Local Government Act 2002 to ensure prudent stewardship and the efficient and effective use of its resources"*

Response to Issues Raised

Charges are not Low:

It is incorrect to say that these charges are low and have not kept pace with costs. Encroachment charges are not low. At the current rate, they are higher on a per square metre basis than Council rates for a 300 or 400 square metre inner suburb property.

It is no more appropriate to link encroachment charges to property prices than it is to link rates directly to property prices.

Charges have not Increased:

We have had our annual Council charges for 25 sq. metres of encroachment increase from \$322.88 in 2010 to \$383.25 in 2021, an increase of 18.6%. The CPI for the period 2010 to 2021 gives a total cost of living increase of 17.5%. Council charges for encroachments have therefore exceeded the rate of inflation for over 10 years.

Fair Value and Return Assets:

Our garage, which is approximately 2/3rds on road reserve has an assessed replacement cost of between \$60k and \$80k. This has been a private investment to which Council has contributed nothing. The garage was located on road reserve as the only option available at the time of construction. There is no alternative use for this land than road frontage for our property. The Council places no value on road reserve for Council accounts, therefore there is NO ASSET VALUE in the unused road reserves to Council. This initiative does not provide any increased return to Council assets, but simply increases the tax imposed on encroachment holders.

Council's Statutory Obligations for Stewardship and Resource Use

Your letter to affected encroachment holders states that this increase is required to fulfil Council's statutory obligations under the Local Government Act to ensure prudent stewardship and the effective use of its resources in the interest of the district.

Previously, the use of bare road reserve land, with no alternative use available to Council, to allow neighbouring property owners for such purposes as garage construction, which allows removal of vehicles from the city's streets, and required the user to maintain the land and encroachments was seen as prudent stewardship and efficient/effective use of resources. The original intention was that administration costs should be covered by the charges. There is no reason why the current Council needs to make any changes to this approach, which has worked well for what I understand is over 100 years.

Council's Approach to Consultation and Increasing Encroachment Charges

The Council's approach to consultation on this issue and the proposed increase in encroachment charges is wrong on a number of levels:

- It has been incorrectly been promoted in the general Annual Plan Consultation Document. Only a very small proportion of the community are affected, and their views should be sought, not that of the general population. The proposed increase in commercial rates is of substantially greater financial importance to the finances of the Annual Plan, and affects more residents than this one, yet is not included for general consultation.
- The Consultation Document is wrong. It says that charges have not increased for several years which is incorrect as noted above. It says that the Council wants a return on its assets, which is wrong road reserves are not assets, (unless Council wants to introduce Road Pricing as a policy and seek returns from the full road network). It says that this will reduce the general rates increase, which is an enormous stretch of reality as it then says that it will reduce rates by 0.4% which is of no consequence against the proposed increase in Council spending by this year.
- The logic that Encroachment fees should increase by 100% because property prices have increased no more applicable to this issue than it is to rate increases – why is this argument applicable to encroachments but not to rates? Both involve the application of charges set unilaterally by Council in an unequal/unbalanced relationship in which property owners cannot avoid paying the charges that Council impose.

The imposition of this increase in charges should be seen as being as unacceptable as an arbitrary increase of rates of a similar 100%. Why does Council believe that a 100% increase in encroachment charges is acceptable when a 100% increase in rates is not? Encroachment charges are, like rates, an

unavoidable cost to property owners. Rates do not increase proportionate to land value but relate to inflation, council spending, and there is no reason why Encroachment charges should be any different.

Both Rates and Encroachment charges are imposed charges by Council exercising the power of Local Government over property owners who have no option but to accede to the payment request. Try proposing a 100% rate increase and see what the response is.

The Road Encroachment Licence

The relationship between the householder and the Council is not that of a commercial tenant and landlord where there is a commercial framework for negotiating rental and other lease conditions, and the Tenant has the option to decline the lease and move elsewhere if they do not want to accept a lease. The conditions which apply to the Council's standard Encroachment Licence Agreement are not negotiable and do not have any of the balancing and rental review conditions which are standard in a tenancy agreement or lease. Property owners will have invested very substantial sums in the structures constructed on road reserves and have a substantial interest in their retention and maintenance – Council has invested nothing in any encroachment and the behaviour of Council staff and Councillors in proposing this increase is opportunistic and parasitic.

For those householders who pay road encroachment charges, there is no option about paying. The householder has no option of negotiation or avoidance of payment short of demolition and removal of the encroaching structure.

The policy is entitled "Road Encroachment and Sale Policy". The reality of Council's approach to working with encroachment holders is that Council makes it almost impossible for an encroachment holder to purchase the encroached land.

An Alternative way for Council to approach unused and Encroachment Road Reserve areas

If Council was serious about wanting to do something different in relation to encroachments, rather than seeking rent increases on facilities that others have built and paid for, why not remove the obstructions to sale of road reserve land and offer to sell road reserve land areas at minimal price, provided that the land is developed for affordable housing. Road reserve is in narrow strips and unavailable for Council to develop in this way (hence is of no value to Council) Making unused road reserve land available to adjacent landowners to develop is the only way of changing this and could be a useful element in the Council's approach to the housing crisis.

Conclusion

If an increase in encroachment charges is directly aligned to the rates percentage increases had been proposed, I would have seen no reason to object to this. Increasing charges for anything by 100% without any logical or clear justification is simply unacceptable and needs to be opposed.

Peter Steel

████████████████████
████████████████████

. Council required that a double garage be built rather than the single garage that was requested, so that over 50% of the charges that we now pay are due to Council forcing our family to build a larger garage than was wanted at the time.

Completely misleading to insert “increase road encroachment charges to better reflect their value” in the general feedback form.

Council’s consultation document is completely misleading. In seeking approval from the general submission pool, with incorrect statements ADD, which will apply excessive increases to a small subset of the community who have no ability to opt out of the charges. What would Council think to a proposal by non-renting community members that Council rents should increase by 100%? At least tenants have the ability to move to avoid excessive charges.



Respondent No: 704

Login: Registered

Responded At: May 15, 2022 16:45:06 pm

Last Seen: May 15, 2022 04:40:30 am

- Q1. **Full name:** Kate Day
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Retain Council's City Housing through increasing rates and borrowing
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** not answered
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** not answered
- Q11. **Are there comments you would like to make about the changes to city housing options?**
I would like to see Council continue to advocate for central government to extend IRRS to ALL city housing tenants - rents should be fair.
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** New landfill on top of the existing landfill (piggyback option)
- Q13. **Are there comments you would like to make about the landfill options?**
Please continue to do everything in your power to minimise waste, including providing kerbside green waste collection, and find an alternative to sending sewage sludge to landfill.

Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints	Neutral don't know
Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	not answered
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	Support
Q17. Increasing encroachment licence fees to better reflect their value	not answered
Q18. Additional funding for a full upgrade to Khandallah summer pool	not answered
Q19. Removal of all library charges to remove barriers to accessing council libraries	Support
Q20. Overall, do you support the proposed budget?	not answered
Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?	not answered
Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)	not answered



Respondent No: 683

Login: Registered

Responded At: May 15, 2022 13:58:21 pm

Last Seen: May 15, 2022 01:00:01 am

- Q1. **Full name:** Aylton Jamieson
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)** I am a Wellington City Council ratepayer
I live in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** None of these options
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** not answered
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** not answered
- Q11. **Are there comments you would like to make about the changes to city housing options?**
I think the social housing should be sold
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** New landfill on top of the existing landfill (piggyback option)
- Q13. **Are there comments you would like to make about the landfill options?**
not answered
- Q14. **Rescheduling of the timing of some projects to recognise market and supplier constraints** Do not support

Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	not answered
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	Do not support
Q17. Increasing encroachment licence fees to better reflect their value	Do not support
Q18. Additional funding for a full upgrade to Khandallah summer pool	Do not support
Q19. Removal of all library charges to remove barriers to accessing council libraries	Support
Q20. Overall, do you support the proposed budget?	I oppose the proposed budget
Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?	
I enclose a submission on the proposed fees changes for Road Encroachment	
Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)	<div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div>

4 February 2021

Wellington City Council
PO 2199
WELLINGTON

Dear Sir or Madam

CONSULTATION ON PROPOSED FEES FOR ROAD ENCROACHMENT

[REDACTED]

I refer to your letter dated 7 April 2022 (“the letter”) regarding the proposed changes to the road encroachment fees.

I have some different perspectives on the views set out in your letter, and I would like you to take these into consideration.

I am strongly opposed to the proposed changes for the following reasons:

- 1) Encroachments are fundamentally different to land which a ratepayer owns, therefore the rate fees charged for encroachments should be lower because of their different legal nature.
- 2) The current encroachment fees are not low when they are compared with other encroachments charged by territorial authorities in the Wellington area.
- 3) The amount charged for encroachment fees has increased more than the amount charged for rates over the last ten years.
- 4) The encroachment fees I am charged are higher per square metre than amount I am charged per square metre on my rates.
- 5) The reason why this and the rates increase are sought, is because the Wellington City Council has squandered the rates that Wellington ratepayers have paid in prior years and continues to do so.
- 6) Wellington City Council conned ratepayers into building fences, garages and “structures” on the basis that they would not be charged for encroachments. However, now that they have built those structures, Wellington City Council is seeking to extract every last cent it can from these encroachments.

I have set out the reasons for those comments in more detail below:

Encroachments are different in nature

Encroachments are only licences to use road reserve which is owned by the territorial authority. So that land is owned by the local authority and the ratepayer is a short-term tenant. According to the Wellington City Council's own policy statement, Wellington City Council can revoke that licence with a month's notice. So, the ratepayer has no interest in the land and can be evicted far easier than any residential tenant.

Therefore, the suggestion that ratepayers who have an encroachment should be paying the same as land which taxpayer owns is risable.

The Current Encroachment Fees are Low

The letter states that "The current encroachment fees are considered low.". The Hutt City Council sets its current charges for Encroachments on Hutt City Council Land in its Annual Plan 2020-2021 at page 105 (refer Tag 1). The Hutt City Council charge for gardens is \$115 per year and \$128 per car park for a garage each year. Wellington City Council's is far in excess of those fees.

Encroachment Fees have not kept pace with land value increases

The letter states that "The fee structure set in the Council's Road and Encroachment and Sale Policy 2011 has not been reviewed for over 10 years and does not reflect the significantly increased land value over this period." This sentence seems to confuse three things – it is agreed that the current policy is the one that was determined in 2011. However, the fact that the policy was made 10 years ago, does not mean the amounts charged have not increased. The rate at which encroachment fees were charged in 2012 was \$11.48 for each square metre. Currently that amount is \$15.33 per square metre. So the rate per square metre has increase 136% over the period from 2012 to 2022.

Over the same period, I have compared the rates I paid on one property in 2012 compared with the rates I paid on the same property in 2022. In 2012, the amount paid I paid for the tax year ended 31 March 2012 was \$3,068.58 and in the year ended 31 March 2022, it was \$3,883.83. Therefore, the percentage increase in the rates over the same period was 127%. So, the rate at which the encroachment fees increased was higher than the rate at which the rates increased over the same period.

The third thing which seems to raise confusion in that statement, is that "The fee structure ... does not reflect the significantly increased land value over this period". There is an inference from that statement, is that the encroachment fees should track the underlying increased value of land in Wellington. With respect this is wrong. The inference from that statement is that if the rateable value increases by 50% (as some properties have in Wellington in the latest revaluation), then rates should also increase by 50%. You only have to say that, to know that it is wrong. Rates are calculated based on the Wellington City Council's budget which is then apportioned based on the valuation of the individual properties. Therefore, in the intervening three years when the rateable value is not changed, the amount paid by each ratepayer can vary (depending on the size of Wellington City Council's budget). With the 2018 Encroachment Fee invoice, Wellington City Council sent a letter stating that the Council's Encroachment Policy provided that residential annual licence fees could be adjusted in accord with the Consumer Price Index (refer Tag 2). I note that it was this Wellington City Council policy had been endorsed by the Department of Internal Affairs, which oversees these matters (refer Tag 3).

Encroachment Fees are currently higher than rates

The letter states that Wellington City Council is proposing to consider "setting the road encroachment fee based on the individual rateable land value of the adjoining property in the 2024/33 Long Term Plan.". I am told by the Wellington City Council Encroachment Office that the encroachment on my property is 55 square metres, although I am charged for 60 square metres. For the 60 square metres I am charged \$919.80 which is \$15.33 per square metre. For the rates on the property, I am charged \$4,699.74 for the 352 square metres which I own. Therefore, I am charged \$13.35 per square metre for the rates, but I am charged \$15.33 per square metre for the encroachment fees. Given that I have

no legal interest in the area for which I pay encroachment fees and which can be removed by Wellington City Council at a month's notice, I am overpaying encroachment fees.

Wellington City Council Squandering Rates

Under section 101 of the Local Government Act 2002, a local authority must “manage its revenues, expenses, assets, liabilities, investments, and general financial dealings prudently and in a manner that promotes the current and future interests of the community.”

Under section 101A of the Local Government Act 2002, a local authority is required to adopt a financial strategy setting out the factors that are expected to have a significant impact on the local authority during the years covered by the financial strategy, including the expected capital expenditure on network infrastructure.

Section 101B of the Local Government Act 2002, the term “infrastructure assets” are defined as including water supply, sewage and the treatment and disposal of sewage and stormwater. Further under section 101B, the local authority must have an infrastructure strategy that outlines how it will renew or replace its existing assets.

Under Part 7 of the Local Government Act 2002, a local authority is required to monitor the water that it provides to a community, it has a responsibility to test that water and if it was providing water to community at the commencement of the Act, to continue with that supply. Under section 128 of the Local Government Act 2002, a local authority must assess the provision of wastewater services, in terms of the quality of the services currently available and health risks to the community.

Wellington City Council has failed to do this with the result that they collected rates from ratepayers on the pretext that they were going to use those funds to maintain drinking water, wastewater and storm water. Wellington City Council took that money, but they spent up to 50% of that money on something else. Water New Zealand figures show in 2019, Wellington City Council spent half or less than half for all three lots of water assets – drinking water supply (36%), wastewater (51%) and storm water (44%) (refer Tag 4).

There have now been a succession of major failures, following Wellington City Council's decision to regularly decline requests for money to upgrade pipes. For example:

the sewage pipe collapse in Dixon Street which sent 6,500 cubic metres of sewage into Wellington Harbour and blocked key CBD streets for months had been noted as a significant risk back in 2004 (refer Tag 5).

A geyser in Aro Street.

A sinkhole in Jervois Quay.

Sewage around Victoria Street.

Drinking water failure for a month in Kaori.

There are currently projections for a repair cost of \$5 billion dollars. Wellington City Council ratepayers are being expected to pay this cost for a second time, because Wellington City Council squandered the money that they paid for these services the first time.

Wellington City Council has frittered away the money it took from ratepayers for drinking water, wastewater and sewage on a variety of “bread and circuses” schemes. Rates are a levy on people who own land within that geographic area, which are then used to fund local amenities. Wellington City Council has become obsessed with providing “social housing” with the result that it is the largest

landlord in New Zealand after Housing New Zealand. The people who rent that social housing only pay 70% of the market rate for that accommodation, and nothing towards the cost of provision of local amenities. This is perhaps why, most other local authorities in New Zealand got out of social housing about 15 years ago.

In the future, Wellington City Council notes that (letstalk.wellington.govt.nz/city-housing):

“Rents are increasingly unaffordable for tenants under the current operating model. It has a growing operating deficit and a shortfall in funding for necessary upgrades. Without new sources of funding, City Housing will not be able to meet its costs of operating and upgrades beyond 2022/23.”

The two options that Wellington City Council gives is to increase rates and borrowing or set up a Community Housing Provider. I think that the option that most ratepayers would endorse is to sell off those social housing properties and repair the outdated and rundown water and wastewater systems.

The letter states that what the Council was trying to with the encroachment increase was to make an economic return from its assets where appropriate. Even with only charging 70% of a market value rental, Council cannot get housing rentals down to what it considers is affordable. Tenants of other social housing providers are able to access an income related rental subsidy, which provided a subsidy which reduces tenants rental to 25% of their income. However, but tenants of local authorities are not able to get an income related rental subsidy. Wellington City Council is facing a 403 million shortfall for upgrades with annual operating deficits that are set to reach almost \$50 million by 2031 (refer Tag 6).

So Wellington City Council ratepayers (who fund Wellington City) are being expected to subsidise the social housing tenants and if Wellington City Council continues to operate as it does at the moment, the Mayor states there will be a 60% increase in rates over the next nine years (refer Tag 6).

There are plenty of Wellington City Council ratepayers who are also superannuitants, and would qualify for Wellington City Council housing. So while Wellington City Council is trying to play Father Christmas, it is punishing those people who do pay towards Wellington City's amenities (including low income people such as superannuitants), so it can subsidise those people who don't pay anything towards Wellington City's amenities. This would seem to be a breach of Wellington City Council's legal obligations under section 101 of the Local Government Act. If the Wellington City Council want to get an economic return for the assets it owns, why doesn't it sell the social housing because it will never get an economic return from the large amount of rates it has wasted on those assets.

Wellington City Council's Con Job

In 1991 Wellington City Council sent a letter to the predecessor in title stating that she was occupying an area of road reserve which fronted her property at 44 Hargreaves Street (refer Tag 7). That letter advised May Cole and Irene Mills that they could use that land “free of cost” for beautification purposes. That property was transferred to Irene Mills by survivorship, after May Cole died in 2001. Both May Cole and Irene Mills had complied with the Council's agreement and had kept the land free from rubbish and in good condition. This involved them in expenditure and time in planting and gardening based on Wellington City Council's written undertaking. I purchased the property from Rene Mills in 2012, by which stage there was a garden which May Cole and Irene Mills had developed.

By that time, Wellington City Council had reneged on its written undertaking that May Cole and Irene Mills could use the encroachment rent free. It is now mooting trying to charge the same amount as it charges for rates (as if the person owned that land).

Contact

I am happy to present make an oral submission to the Councillors so if you would like to hear that, my email address is [REDACTED] and my phone number [REDACTED]

Yours sincerely

A handwritten signature in blue ink that reads "Aylton Jamieson". The signature is written in a cursive style with a large initial 'A' and 'J'.

Aylton Jamieson

Full name

Jason McHerron

Phone number:

██████████

Are you making this submission as an individual or on behalf of an organisation?

Individual

Are you a City Housing tenant?

No

What is your connection to Wellington? *(tick all that apply)*

- I am a Wellington City Council ratepayer
 - I live in Wellington
 - I work in Wellington
 - I own a business in Wellington
 - I study in Wellington
-

Do you wish to speak to Councillors about your submission at an Oral Forum?

Yes

Increasing encroachment licence fees to better reflect their value

Do not support

Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?

The Annual Plan 2022/23 2021-2031 Long-term Plan amendments consultation document is untruthful at page 37 where it states: "Encroachment licence fees have not increased for some time." In fact, encroachment licence fees have increased by CPI every year for the last 10 years. The proposal to suddenly increase the fees by 100% as an interim measure before even larger increases are proposed is a substantial and unaffordable increase at a time of high inflation. It is inconsistent with the requirement to promote the economic wellbeing of people. It is inconsistent with the Auditor-General's good practice guidelines to give certainty and relative stability in fees or levies as opposed to large increases. And it is greedy and overly focused on economic return from assets, without appreciating that (in our case anyway) the land in question is otherwise valueless and was not making any return before we invested heavily in building a garage and retaining wall that has created benefits (reducing road congestion and improving safety) and improving the retention and stability of the road. Instead of this increase, the Council should be allowing licence holders to purchase the encroached land.

Full name:

Dominic Lane

Phone number:

██████████

Are you making this submission as an individual or on behalf of an organisation?

Organisation

Please name your organisation

2 Onslow Road Body Corporate Committee

Are you a City Housing tenant?

No

What is your connection to Wellington? (*tick all that apply*)

I am a Wellington City Council ratepayer

I live in Wellington

I work in Wellington

I own a business in Wellington

I study in Wellington

Do you wish to speak to Councillors about your submission at an Oral Forum?

Yes

Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider

Establish a Community Housing Provider

If the Council did establish a Community Housing Provider, which option do you support?

Option A: Asset-owning CHP with broad responsibilities

If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?

Community Trust

Are there comments you would like to make about the changes to city housing options?

our submission is about proposed encroachment fee increases not housing policy

Increasing encroachment licence fees to better reflect their value

Do not support

Additional funding for a full upgrade to Khandallah summer pool

Support

Removal of all library charges to remove barriers to accessing council libraries

Do not support

Overall, do you support the proposed budget?

I oppose the proposed budget

Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?

Please see the attached submission. A number of members of the home owners at 2 Onslow Road are impacted by proposed fee increase and the Body Corporate endorses the submission, drafted by impacted home owner and body corporate committee member Dominic Lane

You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)





Respondent No: 369

Login: Registered

Responded At: May 06, 2022 08:39:55 am

Last Seen: May 05, 2022 01:39:04 am

- Q1. **Full name:** Caryl Ann Woodbridge
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Organisation
- Q4. **Please name your organisation** Roseneath Residents Association
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)** I am a Wellington City Council ratepayer
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** not answered
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** not answered
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** not answered
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** not answered
- Q13. **Are there comments you would like to make about the landfill options?**
not answered
- Q14. **Rescheduling of the timing of some projects to recognise market and supplier constraints** not answered

Q15. **Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.** not answered

Q16. **A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.** not answered

Q17. **Increasing encroachment licence fees to better reflect their value** Do not support

Q18. **Additional funding for a full upgrade to Khandallah summer pool** not answered

Q19. **Removal of all library charges to remove barriers to accessing council libraries** not answered

Q20. **Overall, do you support the proposed budget?** not answered

Q21. **Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?**

not answered

Q22. **You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)** not answered



Respondent No: 615

Login: Registered

Responded At: May 13, 2022 17:37:50 pm

Last Seen: May 13, 2022 05:19:04 am

Q1. Full name:	Noeline Merle Holt
Q2. Phone number:	██████████
Q3. Are you making this submission as an individual or on behalf of an organisation?	Individual
Q4. Please name your organisation	not answered
Q5. Are you a City Housing tenant?	No
Q6. What is your connection to Wellington? (tick all that apply)	I am a Wellington City Council ratepayer
Q7. Do you wish to speak to Councillors about your submission at an Oral Forum?	Yes
Q8. Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider	Establish a Community Housing Provider
Q9. If the Council did establish a Community Housing Provider, which option do you support?	Don't know
Q10. If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?	Community Trust
Q11. Are there comments you would like to make about the changes to city housing options?	<p>Affordable and good architectural design, look at building around a public square for socialising, on public transport routes, mix age groups and ethnicities. No sprawl, plenty of open spaces. More inner city people friendly apartments with access to parks at the end of every street, dog walking spaces and</p>
Q12. The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?	Waste to energy incineration
Q13. Are there comments you would like to make about the landfill options?	<p>More reuse and recycle. More education to encourage, normalise.</p>

Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints	Support
Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	Support
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	Neutral don't know
Q17. Increasing encroachment licence fees to better reflect their value	Do not support
Q18. Additional funding for a full upgrade to Khandallah summer pool	Support
Q19. Removal of all library charges to remove barriers to accessing council libraries	Support
Q20. Overall, do you support the proposed budget?	I oppose the proposed budget

Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?

ENCROACHMENT FEE INCREASE ON PARKING CARS ON PRIVATELY OWNED CARDECKS/GARAGES ON COUNCIL OWNED LAND The proposed 100% encroachment fee is usurious and unfair, reasons behind this proposal are illogical reasons as follows: 1. Cost benefit to council of parking on car decks and garages built over council owned land: If you look at Maida Vale Road you will note very costly and continuing work on retaining walls to shore up the road. However the areas that do not require this work are underneath the car decks and garages. The Council saves on not having to maintain/retain these areas. 1.1. The numbers of card decks or garages on Council land is very low and the return on any increases minimal. There better ways for the Council to fill its' coffers. For example It would be more financially prudent to encourage more people to build cardecks and garages on council land (banks most often), thus reducing the cost burden of retaining walls to shore up the roads. No financial outlay to Council except for various consents (which the homeowner will pay for anyway). 2. Intention to encourage people to switch to electric cars defeated: Slow charging, 8-12 hours, with occasional fast charges is the essential balance for battery health and life management. We have a plug for our EV on the deck, which is connected to our power supply. EV car owners who have to park on the street cannot instal a charger and connect it to their power supply. There are a myriad of reasons that trying to do this would be impractical and costly even if a solution was possible. This would mean retaining either hybrid or petrol driven vehicles. Getting cars off the streets for this purpose should be a factor. 3. Refer to <https://www.stuff.co.nz/dominion-post/wellington/128508903/car-theft-up-by-nearly-75-in-hutt-valley-while-rates-double-across-wellington>: The article includes advice to people not to park on the street to prevent theft of vehicles. It goes onto to suggest that drivers should find a well-lit street. This is not a solution as a well-lit street is not a deterrent. That well-lit street could be several streets away from my experience. Further it becomes a safety issue, I have personal experience of being attacked when my deck was inaccessible due to road repairs and I had to park my car elsewhere. I did not report it. Cars are much less likely to be broken into if parked on a deck off the road, I speak from experience having lived at my address for 36 years. As a woman alone all of the above is significant. Ironically it was only a few years ago that the council was encouraging people to find ways to park their cars off the street. 4. There is no commercial benefit to the owner of an encroachment for the purpose of parking a vehicle: I do not earn a living from it. 5. This land should not be linked to property values where the land is usable. Note above again the cost benefit to the Council of individuals maintaining/protecting the land, a major cost saving measure that should not be overlooked, 6. The land that my car deck is built over is actually an unusable bank, which as noted above (1) the council does not (and never has) have to maintain. Most car decks or garages on council land are built over unusable banks. 7. With cars parked on Maida Vale Road, a fire appliance is unlikely to be able to get down the road. There is no passing when driving up or down the street when all parks are occupied. This means a car has to reverse up or down the street for a considerable distance until they can reverse into an unoccupied space - where there is a cardeck or garage. 8. Getting people out of cars and using public transport is many decades away and even then it will not be possible in every location. Therefore streets like Maida Vale Road will remain challenged in the long term unless more encouragement and incentives are given to park off the street.

Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23) not answered



Respondent No: 613

Login: Registered

Responded At: May 13, 2022 16:21:45 pm

Last Seen: May 13, 2022 02:59:40 am

Q1. Full name:	Caroline Doust
Q2. Phone number:	[REDACTED]
Q3. Are you making this submission as an individual or on behalf of an organisation?	Individual
Q4. Please name your organisation	not answered
Q5. Are you a City Housing tenant?	No
Q6. What is your connection to Wellington? (tick all that apply)	I am a Wellington City Council ratepayer I live in Wellington
Q7. Do you wish to speak to Councillors about your submission at an Oral Forum?	Yes
Q8. Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider	None of these options
Q9. If the Council did establish a Community Housing Provider, which option do you support?	not answered
Q10. If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?	not answered
Q11. Are there comments you would like to make about the changes to city housing options?	<p>Social housing managed by the council connects the tenants to the community in which they live. Councils should lobby government to increase central funding contributions to social Housing whilst maintaining responsibility for their tenants. My concern with moving to a community housing provider is that the social housing provider will be in a weaker situation when dealing with government than the Wellington city Council would be. Thus advocacy for Wellington's social housing tenants would be weakened. Having lived in Australia where independent social housing providers are largely absorbed into geographically diverse mega organizations such as the Salvation Army the result is a lack of connection of tenants to the local community. I am concerned that changing governments will pursue a similar course of action for social housing providers not tied to their council.</p>
Q12. The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?	New landfill on top of the existing landfill (piggyback option)

Q13. Are there comments you would like to make about the landfill options?

not answered

Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints Support

Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings. Neutral don't know

Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington. Neutral don't know

Q17. Increasing encroachment licence fees to better reflect their value Do not support

Q18. Additional funding for a full upgrade to Khandallah summer pool Support

Q19. Removal of all library charges to remove barriers to accessing council libraries Support

Q20. Overall, do you support the proposed budget? Neutral

Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?

Road Reserves Encroachment Fee Setting This response pertains to the question of fair value payment for road reserve encroachments. What is fair should be based on context and what is provided. As I will show below the proposed increases are anything but fair value increases and should be abandoned for a CPI based annual increase. I will reference my personal situation in what follows as an example but the argument is general. As far as I can tell, paying for a road reserve encroachment in no way limits the councils right to resume the road reserve at any time without compensation. It is not a lease, we have no rights as renters to keep the landlord (council) out. We cannot develop the land or build on it, any improvements would be subject to confiscations without compensation. In our case, the land concerned is so small that alternative uses of the land are all but non-existent given that it must provide our transit in any case. The agreement to pay for use of the encroachment is a commercial agreement with the Council and as such is quite unlike the councils legislative right to levy rates. Like any commercial agreement if one party changes the terms of the agreement the other party can withdraw. We only entered in to it because of council urging that it was a way to recognize we managed some of that excess road reserve. The fee charged was commensurate with the additional small certainty of use provided. A massive increase in fees would cause us to reconsider that decision. In our view reasonable fee increases would only reflect cpi. The council cannot force land holders to take up an encroachment on their adjacent road reserve. Nor can they force existing holders to maintain it whatever fees they wish to change. Therefore unless the council wishes to spend enormous rate payer funds redeveloping all the road reserves their capacity to generate income from it is limited to the willingness of the adjacent landholders to voluntarily pay an encroachment fee. Enormously increasing fees (doubling and then redoubling as proposed) would obviously strain that willingness and may well result in reduced income overall, as those for whom the encroachment is not crucial withdraw. If subsequently the council was to try to explicitly limit the use of the encroachment to the legal minimum then the council would need to maintain the encroachment as the free labour and resources provided by the adjacent landholders would no longer be available. Not to mention the ill will this would create with ratepayers. To assess a fair value for an encroachment fee it is useful to look at the history of road reserve encroachments. They exist to allow the council to expand the road in the future with no impediment to doing so. They were excised from the lots sold to home owners for this purpose. Thus the original council decision disadvantaged the original land purchasers in order to support council planning. In tacit recognition of that, any excess land beyond the existing needs of the road reserve was left in de-facto custody of the original owners. They treated it as their own maintaining it no cost to the council whilst understanding that it could at any time be resumed thus precluding any substantial development of the land. This arrangement mitigated the disadvantage that the council had imposed on the original landholders. It also meant that typically the road reserve land was cared for at no cost to the council until it was resumed to expand the road. It is arguable that, after more than 1/2 a century, by not using the road reserve for its intended purpose the council has forfeited its moral right to continue to hold onto that land. Once the council realized it would not be expanding the road it should have returned the excised excess road reserve to the lot holder as it has done in other cases. Indeed 13a mairangi road was obtained by the original owner of 13 mairangi rd in exactly that way. The council abandoned plans to build (a road?) on land at right angles to 13 mairangi and divided the land between the adjacent landholders. This resulted in a rate income for the council but at an unimproved land rate as the land was too small to build on. Similarly a small abandoned lot was added to 11c recently, again generating additional unimproved land rate income for the council. When the land was sold to us no mention was made that more than was expected of the land was road reserve. There was no obvious way to determine that the property line was so far from the road from the lot diagrams. I suspect that was also the case in previous sales. In our case we only became aware of the excess road reserve when our neighbour discovered it when they went to further develop the access to their land. Presumably many, or perhaps most, landholders with an extended road reserve are also unaware and do not hold an encroachment. As a result it seems encroachment fees are only paid by an ad-hoc subset of those people with an extended road reserve. Given the effectively voluntary nature of encroachment agreements, the council may do better by codifying and enhancing the rights of encroachment holders and publicising to ratepayers the benefits of holding an encroachment on excess road reserve in front of their property to those who do not do so. By so doing the council can increase its revenue by increasing the number of people with encroachment agreements rather than by unfairly targeting and driving away the subset that already have them. Alternatively, If the council wishes to charge the equivalent of rates for those excess road reserves, it should surrender them to the landholders that transit through them as it has in the cases above. Otherwise the charge would be incommensurate to the service provided.

Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)

not answered



Respondent No: 689

Login: Registered

Responded At: May 15, 2022 15:17:59 pm

Last Seen: May 15, 2022 03:15:14 am

- Q1. **Full name:** Thomas McClurg
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
I own a business in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** not answered
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** not answered
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** not answered
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** not answered
- Q13. **Are there comments you would like to make about the landfill options?**
not answered

Q14. **Rescheduling of the timing of some projects to recognise market and supplier constraints** not answered

Q15. **Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.** not answered

Q16. **A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.** not answered

Q17. **Increasing encroachment licence fees to better reflect their value** Do not support

Q18. **Additional funding for a full upgrade to Khandallah summer pool** not answered

Q19. **Removal of all library charges to remove barriers to accessing council libraries** not answered

Q20. **Overall, do you support the proposed budget?** not answered

Q21. **Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?**

These Comments relate solely to proposed changes to annual rental fees for road encroachment as communicated in the letter from Wellington City Council dated 7 April 2022 and signed by Shu Huang. All of the options consulted upon are flawed and an alternative proposal is contained in the attached supporting document. In summary, this proposal is to reduce road encroachment fees to zero; the value of the encroachment opportunity to the adjoining title will be reflected in the rateable value of that property and the Council would recover its share of that value (whatever it may be) through rates.

Q22. **You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Consultation on the Proposed Changes to Annual Rental Fees for Road Encroachment.

Submission from Thomas and Helen McClurg

14 May 2022

Background

Through our family trust, we purchased our residence at [REDACTED] in 2013 [REDACTED] [REDACTED]. At the same time (4 September 2013) we became the licensee over 37.2m² of road reserve under Wellington City Council Licence Agreement (Ref. 10150386) with an annual licence fee of \$460.54 plus GST per annum. That fee has increased to \$495.89 plus GST per annum (8%). Meanwhile capital value has risen from \$1,275,000 to \$1,940,000 (52%) somewhat supported by expenditure on improvements of over \$200,000. At the same time WCC and GWRC rates have increased from \$6,159.74 per annum to \$9,694.50 (57%).

The terms of the licence mean that the licence can only be granted to the owner and occupier of 58 Tinakori Road and we (as owner and occupier) had no choice other than to become the licensee. The only uses permitted on the licence area of 37.2 m² are “for the purposes of fencing and planting the land only”. All maintenance responsibilities and other liabilities relating to the licence area are ours.

Council Policy and Review Options

The consultation letter of 7 April 2022 contained three options which would increase road encroachment fees by between 100% and 300%. Notwithstanding the obvious difference between 100 and 300% all three proposals were considered to “reflect the principle of the Encroachment Policy which is recognising that road reserve is Council-owned land, and it will seek to make an economic return from this asset where appropriate.”

Under the FAQs information provided by the Council on proposed changes to road encroachment fees the question is raised; *Why does the Council charge licence/lease holders for land with no other value?* The information provided does not answer this question but makes a number of disconnected points. These include that land value is set by its highest and best use (including potential uses), that unformed road can have public values (which are not therefore private values) and that the right to place improvements on unformed road can sometimes be a valuable right.

None of these points sum to a coherent explanation or defence of the Council’s present or proposed road encroachment fee regime.

Valuation of a Road Encroachment Licence Area

The rateable value of [REDACTED] has a caveat that the 37.2m² of land on road reserve is “not included in the valuation”. This caveat is not entirely accurate in an economic sense. The 37.2m² is owned by the Council in fee simple (it is an unsurveyed portion of the public road – Tinakori Road - to which the Council has title). The encroachment licence land area itself is not included in the valuation but the opportunity, or ‘potential’ value, (to use the Council’s own term) of holding an encroachment licence from the Council over the land is included in the valuation of 58 Tinakori Road. Only the owner and occupier of adjacent land can obtain and hold such a licence and the Council is unable to allocate that licence to anyone other than that owner and occupier. To the extent that the

licence opportunity has value, that value is therefore incorporated within the capital value of [REDACTED] as part of the bundle of rights and opportunities attached to its title.

The 2011 Council Encroachment Policy describes road reserve as an **asset**. The policy therefore contains a logical leap which is that the ownership of roads/road reserves has a positive value to the Council. It is debateable whether roads are an asset or a liability to the Council that owns them. The Council budget indicates that roads are a cost. Undoubtedly, roads are an asset to the city (as distinct from the Council) and roads add to the rateable value of private properties able to access the roading network.

The amount of value the roading network adds to the valuation of each individual property is variable and difficult to assess. Whatever that contribution to individual property value may be, it is capitalised into rateable value and the Council is relieved of trying to unravel all of the myriad threads that comprise rateable value. The Council Encroachment Policy fails to understand that use of road reserves generates value by the same mechanism as roads (by the potential or actual enhancement of the rateable value of private properties).

The Council Encroachment Policy has failed to properly investigate three crucial questions:

1. How do road encroachment licences create value?
2. How can the Council manage encroachment licences in the best interests of its district (City) as opposed to its own best interest?
3. What are the economic impacts of the proposed changes to the encroachment licencing fee system?

How do Road Encroachment Licences Create Value?

The addition of a road encroachment licence to an adjacent property will have a positive or negative marginal effect on the current market value of that property. Current Market Value aggregates the value of land and all improvements on the property (capital value) and current market value weighs up the expected benefits and costs of property ownership including the costs and benefits with an associated road encroachment licence. Arguably, the marginal value impact of the licence attaches to the land value component of capital value but for these purposes it is sufficient to say that the effect is on current market value and rateable value (a periodic assessment of current market value apportioned between land value and the value of improvements).

The size of the marginal value impact of an encroachment licence on an adjacent property is highly variable, being affected by the unique attributes of the property but also affected by the individual intentions and desires of the property owners for the use of their property. One thing is certain; the value of the licence is not simply proportional to the value of the adjoining land. The concern expressed by Council that encroachment fees have not moved in proportion with land values is therefore misplaced. Similarly, proposed Option 4 to align encroachment fees with land value is not principled, but arbitrary.

In most markets, market values are determined by the interplay of the subjective valuations of many competing buyers and many competing sellers to determine a market price set by the most willing buyer and the most willing seller. In the case of an encroachment licence however, there is no broad market but only one 'buyer' and one 'seller' (a particular property owner and the Council). The value of the licence to the 'buyer' may vary from weakly negative to strongly positive. The *in situ* or use value of the licence to the Council in the absence of trading it to the one available 'buyer' is negative. Its underlying use is as a road. The Council is unable to sell it or lease it to anyone other than the adjacent landowner who cannot be denied access to the licence area because it is legal road.

Although the Council argues in its FAQ sheet that unformed road can have various public amenities, the costs of providing those amenities are appropriately therefore public costs (a general burden on rate payers).

In summary, an encroachment licence has no inherent value unless it can be added to an adjoining land title temporarily or permanently.

How can the Council Manage Encroachment Licences in the Best Interests of its District (City) - as Opposed to its Own Best Interest?

The current terms of use of encroachment licences minimises their value. The value of any right is affected by the duration of that right. In the case of our encroachment licence, it can be terminated at the discretion of the Council at one month's notice and the Council may order the removal of all improvements from the licence area (that until that moment had been 'permitted uses'). This licence condition means that security of the licence is very low and the value of improvements on the licence area is always reduced by a contingent liability equal to the costs of their removal.

The value destroying effect of a one-month termination clause is bizarre given the stated willingness of the Council to allow licence holders to obtain fee simple (indefinite term titles) over licence areas. The current choices of occupation term are either one month or forever.

What are the Economic Impacts of the Proposed Changes to the Encroachment Licencing Fee System?

There is no analysis of the respective economic impacts of the three fee system changes consulted upon. The FAQs state "*the proposal for consultation reflects a staged approach taken by the Council, taking into account affordability*". The concern about affordability reflects the fact that many licence holders have no choice but to pay the encroachment fee no matter how it is calculated. In turn, this concern reveals that the encroachment fee is essentially a tax or an unavoidable cost of property ownership. The question that the Council needs to answer is what the effects of changes to this cost have and who actually bears this cost? The answer to that question may surprise the Council.

As the value of an encroachment right is attached to the land value of the adjacent property, it is part of rateable value already taxed by the Council through rates. Over time, expected rating costs and expected encroachment fee costs will both affect rateable value. All things being equal, an increase in either of these costs of property ownership will decrease property value. There is a clear circularity between the encroachment fee and rateable property value. Increasing encroachment fees by \$100 and increasing rates by \$100 will have the same downward impact on rateable value. All things being equal, increasing encroachment fees decreases rateable value. Two conclusions can be drawn from this insight.

First, the Council therefore does not have to separately value encroachment benefits because that is already being done (property by property) by the property market. In other words, the Council would not be worse off if it reduced encroachment fees to zero. In fact, it would be better off to the extent that costs associated with operating the existing and proposed pricing regimes could be dispensed with. Second, the Council cannot tax the same thing twice. As explained below, the Council has some opportunity to 'double dip' in the short term, but ultimately the property market will factor in the impact of licence fees on rateable value

"Highest and Best Use"

The "highest and best" use of road reserve is a function of the permitted uses allowed under the licence. These are not the same as the permitted uses under the adjacent title. The value of the

land in the title to 58 Tinakori Road is associated with residential use (by providing the site of a house and associated amenities for the last 112 years and with an expectation of indefinite ongoing use for that purpose). The value of the road encroachment licence is restricted to the permitted uses of fencing and planting, which can be terminated at one month's notice at the sole discretion of the Council. Residential land is much more valuable than encroachment licence land because the permitted uses are far more valuable and the security of tenure is vastly better.

The highest and best uses and the security of tenure over our residential section and the encroachment area are completely different and the value of our residential section per square metre cannot simply be extrapolated onto the licence area per square metre. "Highest and best" use suggests alternative uses (which may evolve over time and may entail different owners or occupiers). There are no alternative occupiers or owners to the road encroachment licence area other than the Council (for roading purposes) or us (for permitted uses).

Freeholding Road Encroachment Areas

As mentioned in the FAQs supplied, property owners can choose to buy an encroachment area. We have investigated this option and were surprised to read in the FAQ answer that "*current policy provides a financial incentive of up to \$12,500 to encourage purchasing of the encroachment land if appropriate*". Certainly, no such incentive was offered to us. The terms of freeholding as explained to us were that we were required to pay all of the costs of re-surveying our section plus the legal fees to issue a new title incorporating the extra 37.2 m². In addition, we would have to buy the land from the Council at the average value per square metre of our existing section. Of course, the value per square metre of our existing section reflects the fact that it is already surveyed and titled. Contrary to the explanation "*the current low fees charged may be a disincentive to purchase as it is easier/cheaper to have an encroachment licence than to buy land*" the reasons why few people avail themselves of the opportunity to purchase land are that:

1. The Council attempts to sell unsurveyed and untitled land at surveyed and titled values.
2. The Council sells land with narrow permitted uses for residential value (thereby capturing all the value uplift from land use change – leaving no such benefit for the buyer).
3. The Council sells encroachment land at the average value per m² of land that (by definition) is already a self-contained residential section (the Council sale price does not reflect the marginal value of encroachment land to the adjacent residential title).

Average versus Marginal Value

To explain the last point further, imagine that encroachment land had been purchased from the Council but then was subsequently taken under the Public Works Act for roading purposes. The value impact on the landowner for the taking would be determined by assessing the value of the land before the taking and assessing the value after the taking. The compensation paid reflects the impact of the marginal change to the land area. This well-established principle recognises that the benefit or cost of either having or losing that additional land is equal and also unique – depending on the circumstances. It is wholly unsatisfactory that such compensation should be arbitrary. By the same token it is entirely unsatisfactory that the encroachment licence fee regime should be arbitrary.

Simplicity and Fairness

Evidently, the Council is searching for a road encroachment pricing regime that is simple to administer but also fair. In fact, the analysis above shows that all of the options under consideration will be unfair on road encroachment licence holders. Rateable values factor in the existing (low) encroachment fees. Increasing encroachment fees by 100% to 300% is "double dipping" by the

Council until such time as rateable values can respond (downward) to the new fees. Until then, Council will collect both the new high fees and extra rates on rateable valuations based upon the old low fees.

Conclusion

It is pointless, costly and unfair to try and tax the same thing through two different mechanisms. Accordingly, the Council should reduce all encroachment fees to zero and allow the highly variable individual value impacts of encroachment licences on adjacent titles to imbed themselves in rateable value.

By the same token, Council should allow property owners to buy the encroachment fee without charge, other than the obligation to meet all associated survey and legal costs. The marginal value of land addition to the enlarged title (whatever that value may be in each case) will change the marginal rateable value of property.

This approach will best achieve the objective stated by the Council which is *“fulfilling the Council’s statutory obligation under the Local Government Act 2002 to ensure prudent stewardship and the efficient and effective use of its resources in the interests of its district”*. The interests of the district, in this case are distinct for the interests of the Council as an organisation.



Respondent No: 695

Login: Registered

Responded At: May 15, 2022 16:04:11 pm

Last Seen: May 14, 2022 20:45:34 pm

- Q1. **Full name:** Shane Edgar
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)** I am a Wellington City Council ratepayer
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Establish a Community Housing Provider
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** Option A: Asset-owning CHP with broad responsibilities
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** Community Trust
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** Waste to energy incineration

Q13. **Are there comments you would like to make about the landfill options?**

Waste to energy incineration is used extensively in Scandanavia. Many of these plants are in the metropolitan areas of large cities and even with residential areas. The technology produces clean emissions with the dual benefit of recovering energy that reduces emissions elsewhere, and reduces need for methane emitting landfills

Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints	Support
Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	Support
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	Neutral don't know
Q17. Increasing encroachment licence fees to better reflect their value	Do not support
Q18. Additional funding for a full upgrade to Khandallah summer pool	Support
Q19. Removal of all library charges to remove barriers to accessing council libraries	Neutral don't know
Q20. Overall, do you support the proposed budget?	I oppose the proposed budget
Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?	
Supporting document attached with feedback on proposed changes to Encroachment Licence Fees	
Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)	<div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px;"></div>



Respondent No: 52

Login: Registered

Responded At: Apr 20, 2022 13:53:29 pm

Last Seen: Apr 20, 2022 01:48:56 am

- Q1. **Full name:** Simon Mason
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Organisation
- Q4. **Please name your organisation** Kelevra Holdings Limited
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
I own a business in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Establish a Community Housing Provider
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** Option A: Asset-owning CHP with broad responsibilities
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** Company or limited partnership
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** Waste to energy incineration
- Q13. **Are there comments you would like to make about the landfill options?**
not answered

Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints	Do not support
Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	Do not support
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	Do not support
Q17. Increasing encroachment licence fees to better reflect their value	Do not support
Q18. Additional funding for a full upgrade to Khandallah summer pool	Do not support
Q19. Removal of all library charges to remove barriers to accessing council libraries	Do not support
Q20. Overall, do you support the proposed budget?	I oppose the proposed budget
Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?	
<p>Council should not be asking rate payers to provide more funding. The council receives more than enough funding for its core services. Council officials appear to be misusing funds for their pet projects such as waterfront signage at a cost of \$180k.</p>	
Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)	not answered



Respondent No: 116

Login: Admin

Responded At: May 17, 2022 11:39:11 am

Last Seen: May 18, 2022 03:45:45 am

- Q1. **Full name:** Paul Freethy Wilson
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)** I am a Wellington City Council ratepayer
I live in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** not answered
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** not answered
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** not answered
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** not answered
- Q13. **Are there comments you would like to make about the landfill options?**
not answered
- Q14. **Rescheduling of the timing of some projects to recognise market and supplier constraints** not answered

Q15. **Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.** not answered

Q16. **A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.** not answered

Q17. **Increasing encroachment licence fees to better reflect their value** Do not support

Q18. **Additional funding for a full upgrade to Khandallah summer pool** not answered

Q19. **Removal of all library charges to remove barriers to accessing council libraries** Support

Q20. **Overall, do you support the proposed budget?** Don't know

Q21. **Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?**

not answered

Q22. **You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)** not answered



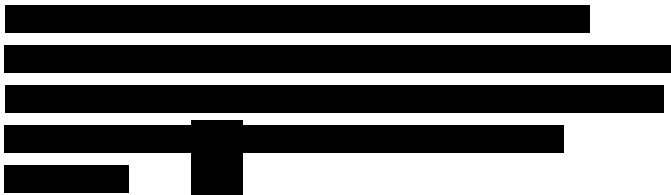
Respondent No: 673

Login: Registered

Responded At: May 15, 2022 12:51:05 pm

Last Seen: May 15, 2022 00:45:46 am

- Q1. **Full name:** Gwyn Morpew
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
I own a business in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Don't know
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** not answered
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** not answered
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** Don't know
- Q13. **Are there comments you would like to make about the landfill options?**
not answered

Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints	Neutral don't know
Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	Neutral don't know
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	Neutral don't know
Q17. Increasing encroachment licence fees to better reflect their value	Do not support
Q18. Additional funding for a full upgrade to Khandallah summer pool	Neutral don't know
Q19. Removal of all library charges to remove barriers to accessing council libraries	Support
Q20. Overall, do you support the proposed budget?	Don't know
<p>Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?</p> <p>Please see attached Submission Document regarding the Proposed Encroachment Fee Structure Options</p>	
<p>Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)</p>	

Gwyn Morphey

15 May 2022

To: Wellington City Council

Submission: Encroachment Fee Structure Options

To whom it may concern:

1. Please accept my submission on the proposed options the council have communicated regarding changes to the current Encroachment Fee Structure within the council's 2022/2023 Annual Plan in the document entitled "ATTACHMENT - REVIEW OF FEE STRUCTURE FOR ROAD ENCROACHMENT LICENCES AND LEASES".
2. My submission specifically relates to Option 2 and Option 4 described within the attachment.

Option 2

3. Ratepayers need the council to be accountable for the money they spend on behalf of ratepayers. As such, I support the information set out in Option 2 as recommended in the attachment because it is simple to administer and will not require a significant increase in the council efforts (costs) to administer.
4. In good faith to ratepayers, these Option 2 increases should be **phased in** over a period of 3 years. This is based on:
 - a. The cost of living crisis
 - b. The high 13.5% increase in rates last year
 - c. The additional 8.8% increase in rates proposed this year, resulting in an already shocking increase of over 22% in two years
 - d. The continued loss of ratepayer support of the Council due to the increasing approval and spend on perceived non-mandatory, non-urgent projects which have, in some cases ignored alarming numbers of public opposition
5. I strongly oppose the consideration of Option 4 as noted in the Officers recommendations for the 2024 Long Term Plan because:
 - a. It is difficult and likely costly to administer. This administration effort is an irresponsible spend of ratepayer money and provides no tangible value to the community.
 - b. Land Values are arbitrarily set - a decline in house prices rarely results in a decline in land values
 - c. It can be inequitable among residents living in the same area
 - d. It will cause, in many situations, **an additional 900% increase in the fee**; this is above the Option 2 increase of 100% already imposed. This increase is completely unreasonable.
 - e. In most situations, these encroachments **have no other use** for council or anyone other than the property owner; the high fee will result in many parking structures being demolished by the property owner to eliminate the need for a licence, thereby contributing to the parking issues on Wellington residential roads and reducing the encroachment fees Council can collect in the future.
 - f. This is unfair to long-term residents who have owned their home for a lengthy time period, potentially inter-generational, and who are and have always been responsible for the maintenance and upkeep of the land. The untenable increase will force many to sell their homes, will likely decrease the value of the home, reduce the RV of the property, and ultimately the funds Council will receive from the rates.
 - g. If this option is still to be considered within the 2024 Long Term Plan, ratepayers will expect further opportunity for public consultation as there are so many factors to be considered which will likely have unintended consequences if ignored.

Thank you for your consideration of my above points.

Kind regards,

Gwyn Morphey



Respondent No: 610

Login: Admin

Responded At: May 13, 2022 15:59:33 pm

Last Seen: May 15, 2022 10:49:41 am

- Q1. **Full name:** Charles William Bremner Wood
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Retain Council's City Housing through increasing rates and borrowing
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** not answered
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** not answered
- Q11. **Are there comments you would like to make about the changes to city housing options?**
Community Trust
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** not answered
- Q13. **Are there comments you would like to make about the landfill options?**
not answered
- Q14. **Rescheduling of the timing of some projects to recognise market and supplier constraints** not answered

Q15. **Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.** not answered

Q16. **A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.** not answered

Q17. **Increasing encroachment licence fees to better reflect their value** not answered

Q18. **Additional funding for a full upgrade to Khandallah summer pool** not answered

Q19. **Removal of all library charges to remove barriers to accessing council libraries** Support

Q20. **Overall, do you support the proposed budget?** not answered

Q21. **Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?**

I currently pay encroachment fees to enable my access to off-street vehicle parking (Part of my garage occupies a small area of road reserve) This enables me to park my vehicle off the road. Our street (volga street) is becoming increasingly congested with vehicles (Mainly cars), parking on both sides of the road. there is no charge for these parked vehicles. This seems to be contradictory - meaning if I don't have off-street parking, but parked on the road, I wouldnt need the garage and wouldnt need to pay for the encroachment. WCC should be encouraging off street parking, rather than increasing its cost, to us. Why not charge people for parking on our street, which is also WCC property?

Q22. **You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)** not answered



Respondent No: 122

Login: Admin

Responded At: May 17, 2022 13:05:49 pm

Last Seen: May 18, 2022 03:45:45 am

Q1. Full name:	Phil Gibbons
Q2. Phone number:	[REDACTED]
Q3. Are you making this submission as an individual or on behalf of an organisation?	Organisation
Q4. Please name your organisation	Nuku Ora
Q5. Are you a City Housing tenant?	not answered
Q6. What is your connection to Wellington? (tick all that apply)	not answered
Q7. Do you wish to speak to Councillors about your submission at an Oral Forum?	Yes
Q8. Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider	not answered
Q9. If the Council did establish a Community Housing Provider, which option do you support?	not answered
Q10. If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?	not answered
Q11. Are there comments you would like to make about the changes to city housing options?	not answered
Q12. The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?	not answered
Q13. Are there comments you would like to make about the landfill options?	not answered
Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints	not answered

Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	not answered
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	not answered
Q17. Increasing encroachment licence fees to better reflect their value	not answered
Q18. Additional funding for a full upgrade to Khandallah summer pool	not answered
Q19. Removal of all library charges to remove barriers to accessing council libraries	not answered
Q20. Overall, do you support the proposed budget?	not answered
Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget? not answered	
Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)	https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/ca5624daa7649f6544a80ed1fae9ff9c8c4c8f0a/original/1652749547/2f4b33f3db5b6e2883463bd8a6d21126_Phil_Gibbons_-_Nuku_Ora.pdf?1652749547



Respondent No: 37

Login: Registered

Responded At: May 15, 2022 15:11:51 pm

Last Seen: May 15, 2022 03:02:18 am

Q1. Full name:	Roger Bolam
Q2. Phone number:	021407123
Q3. Are you making this submission as an individual or on behalf of an organisation?	Organisation
Q4. Please name your organisation	Bullion Properties Ltd
Q5. Are you a City Housing tenant?	No
Q6. What is your connection to Wellington? (tick all that apply)	I am a Wellington City Council ratepayer I live in Wellington
Q7. Do you wish to speak to Councillors about your submission at an Oral Forum?	Yes
Q8. Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider	Don't know
Q9. If the Council did establish a Community Housing Provider, which option do you support?	not answered
Q10. If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?	not answered
Q11. Are there comments you would like to make about the changes to city housing options?	not answered
Q12. The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?	New landfill on top of the existing landfill (piggyback option)
Q13. Are there comments you would like to make about the landfill options?	not answered
Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints	Neutral don't know

Q15. **Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.** Support

Q16. **A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.** Neutral don't know

Q17. **Increasing encroachment licence fees to better reflect their value** Do not support

Q18. **Additional funding for a full upgrade to Khandallah summer pool** Neutral don't know

Q19. **Removal of all library charges to remove barriers to accessing council libraries** Neutral don't know

Q20. **Overall, do you support the proposed budget?** Don't know

Q21. **Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?**

Proposed increase to Road Encroachment Fees It is this ratepayer's submission that whatever the ideological basis for Council Fee increases, proposing an increase of 100% in one year is unconscionable, oppressive and arrogant. Ratepayers who make improvements on Road reserves do so on the entirely reasonable expectation that fees will continue to be charged during the life of such improvements on a similar rating basis to that which existed at the time when such arrangement was initially entered into. This is the very basis on which affected ratepayers made their investment decisions and on which subsequent property owners purchased the properties. Accordingly we would adamantly submit that it is inequitable for WCC to change the basis of the Road Reserves Encroachment Fee structure in this manner. In the instance of the encroachment at 20 Durham St, Aro Valley the encroachment is on unimproved land and is used simply to provide off street parking for tenants and to de-clutter the road of parked cars. The encroachment fees are passed on to our tenants in their tenancy agreements. There is no benefit to the owner in paying this proposed increased fee and the tenants have indicated they will not be paying the extra \$720pa. They are furious that WCC is actively looking to increase their weekly parking rent by such a huge percentage. Accordingly the encroachment licence will be surrendered and WCC will sustain a loss of income rather than the expected increase. To summarise, we submit that this proposal reeks of bureaucratic arrogance and an incredible lack of connection with reality and the current economic times for property owners and their tenants. WCC's proposal is unconscionable and poorly thought out. We will not pay the proposed increased fee.

Q22. **You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)** not answered



Respondent No: 136

Login: Admin

Responded At: May 17, 2022 15:14:34 pm

Last Seen: May 18, 2022 03:45:45 am

Q1. Full name:	Karyn Burgess
Q2. Phone number:	v
Q3. Are you making this submission as an individual or on behalf of an organisation?	Organisation
Q4. Please name your organisation	Greater Wellington Regional Council
Q5. Are you a City Housing tenant?	No
Q6. What is your connection to Wellington? (tick all that apply)	not answered
Q7. Do you wish to speak to Councillors about your submission at an Oral Forum?	Yes
Q8. Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider	not answered
Q9. If the Council did establish a Community Housing Provider, which option do you support?	not answered
Q10. If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?	not answered
Q11. Are there comments you would like to make about the changes to city housing options?	not answered
Q12. The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?	not answered
Q13. Are there comments you would like to make about the landfill options?	not answered
Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints	not answered

Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	not answered
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	not answered
Q17. Increasing encroachment licence fees to better reflect their value	not answered
Q18. Additional funding for a full upgrade to Khandallah summer pool	not answered
Q19. Removal of all library charges to remove barriers to accessing council libraries	not answered
Q20. Overall, do you support the proposed budget?	not answered
<p data-bbox="146 896 1447 985">Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?</p> <p data-bbox="191 996 335 1041">See attached</p>	
<p data-bbox="146 1075 734 1232">Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)</p>	<p data-bbox="750 1075 1447 1232">https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/fe2ee7e22e5e837edaba2ff129076fe0607d7d9c/original/1652757273/1f114bacb2144b844d3e74cfa491d70_Karyn_Burgess.pdf?1652757273</p>

By email

12 May 2022

Email to: AnnualPlan@wcc.govt.nz

Tēnā koutou

Submission on Mahere ā-tau Annual Plan 2022/23

Thank you for the opportunity to provide feedback on Mahere ā-tau Annual Plan 2022/23.

Greater Wellington Regional Council (GW) wishes to support the submission of Toimata Foundation on the 2022/2023 Wellington City Council (WCC) Proposed Annual Plan. We are requesting that you both improve the security and increase the amount of funding provided to Toimata Foundation for the provision of an Enviroschools network in Te Whanganui-a-Tara.

To meet existing demand and allow for future growth, Toimata Foundation are seeking \$160,000 from WCC this financial year. There is significant unmet demand in Te Whanganui-a-Tara from schools and early childhood centres (ECEs) who wish to be part of the Enviroschools network and commit to sustainability. Half of the 41 schools registered as part of the network are not receiving active facilitation due to insufficient funding. A further 15 schools have made enquiries in the last 18 months about joining the network.

We also request a change in the way WCC provides funding for Enviroschools to a secure, long-term commitment. Currently Toimata Foundation applies to a contestable fund every three years. This requires significant effort spent on reapplying and describing the value of the network. The long-term relationships that Enviroschools Community Facilitators develop with schools and ECEs are a core reason for the success of the programme and maintaining those long-term relationships requires sufficient, secure funding. Ongoing security of funding supports the recruitment and retention of skilled people to carry out the Community Facilitator roles.

Supporting the Enviroschools network is a collaborative effort between Toimata Foundation, schools, ECEs, mana whenua, councils, and other organisations across the region. Councils have a critical role to play which is recognised in our Regional Statement of Collaboration. Representatives from each council across the region agreed to the following three ways of working together:

- Work together in flexible, high-trust relationships that support a collaborative approach
- Support innovation in the ways the Enviroschools kaupapa is shared with and supported in our local communities

- Explore ways to grow the regional reach of the Enviroschools approach and to foster the depth of practice across the Enviroschools Network

To support these ways of working, GW has recently increased our investment and improved job security in the Enviroschools team by creating two permanent positions for Enviroschools regional leadership and coordination within GW. This is in addition to providing office space, vehicle use and other in-kind support to the wider Enviroschools Te Upoko o te Ika team whose roles are funded by territorial authorities.

GW also acknowledges the value that the Enviroschools Network brings to other environmental education programmes in the community. Enviroschools helps schools to develop and maintain their holistic sustainability journey. This adds significant value to other programmes that schools are participating in by providing a framework and facilitated support to embed sustainability learning into the school's practices and programmes.

The Enviroschools kaupapa helps to weave together the joint responsibilities of GW and WCC within the communities we serve. We are proud of our work alongside WCC and Toimata to create a resilient and sustainable future. To grow the Enviroschools network and enhance depth of practice, we encourage WCC to join us in providing long term and sufficient funding for the Enviroschools network in Te Whanganui-a-Tara.

Ngā mihi,

A handwritten signature in blue ink, consisting of a stylized initial 'N' followed by a long horizontal line that tapers to a point on the right.

Nigel Corry
Chief Executive

For further discussion on the specifics of this submission, please contact Karyn.burgess@gw.govt.nz

Full name

Anke Nieschmidt

Phone number:

[Redacted]

Are you making this submission as an individual or on behalf of an organisation?

Organisation

Please name your organisation

Toimata Foundation

Do you wish to speak to Councillors about your submission at an Oral Forum?

Yes

You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)

[Redacted]

Submission:

Wellington City Council (WCC) Annual Plan 2022/23



Topic: WCC investment in Enviroschools

In this submission we:

1. Acknowledge and thank WCC for its long-term support of Enviroschools Te Upoko o te Ika a Māui since 2006.
2. Request that WCC invest in its *Strategy for Children and Young People* through this Annual Plan.
3. Request that WCC commit to the Enviroschools Regional Statement of Collaboration* by channelling \$160,000** of this investment into Enviroschools in the coming financial year and growing investment in the Enviroschools Network over time.

*See Appendix 1 – Regional Statement of Collaboration

** See Appendix 2- Funding Level Options - for a description of what can be achieved at different levels of investment.

WCC and Enviroschools – an ongoing relationship

WCC has worked in collaboration with Toimata Foundation (the national support organisation for Enviroschools), GWRC, other territorial authorities and many other collaborating partners locally, regionally and nationwide to provide an Enviroschools Network in Te Whanganui-a-Tara since 2006.

Enviroschools is a network of early childhood education centres (ECE) and schools learning and taking action together across a range of real-world issues that matter to them and to the community. Through Enviroschools young people are empowered to be change makers as they plan, design and implement projects and then reflect on their learning and action. Enviroschools also addresses the sustainability of the systems and environments in which our young people find themselves most of the time – ECE and schools.

Enviroschools is acknowledged in WCC's *Strategy for Children and Young People* as an organisation the council funds to deliver on this strategy. Enviroschools also aligns well with other WCC strategies including *Our Capital Spaces* and *Our Natural Capital*.

Staff from Toimata Foundation and all the Enviroschools council partners in Te Upoko o te Ika a Māui have developed a *Regional Statement of Collaboration* outlining how we work together to support innovation and growth in the Enviroschools network.

We thank you for your part in this over the last 17 years.

The significance of Enviroschools in delivering on WCC's Strategy for Children and Young People

We live in a world of increasing environmental and social challenge. WCC's Strategy for Children and Young People recognises the importance of ensuring that our young people are "active in a sustainable economy, resilient in the face of climate change impacts and unforeseen events." (Pg 6)

Young people are increasingly vocal that they want change and that they want to be part of the process.

Enviroschools contributes to all focus areas of WCC's Strategy for Children and Young People with a particular strength in Focus Area 6 - Participating in change.

The way Enviroschools addresses the sustainability of the systems and environments in which our young people find themselves is unique and makes it significant in the mix of organisations funded as part of the strategy.

ECE and schools in Te Whanganui-a-Tara see the value in being part of the Enviroschools Network with increasing numbers inquiring about becoming part of this network (approximately 20 new inquiries in the past 18 months).

An Effective Approach to Funding a Strong and Inspiring Enviroschools Network

To be effective as a network, Enviroschools needs funding that

- is sufficiently secure to recruit and retain effective facilitators
- provides sufficient facilitator capacity to
 - maintain relationships with ECE and schools already participating in the network
 - respond to and build on new interest in the network, and
 - take advantage of collaborative opportunities with other providers
- has the potential to grow in response to network need.

The Current Situation See Appendix 3

The current funding from WCC is sufficient to employ a part-time facilitator for 23 hours per week. Small part-time roles such as this do not provide the flexibility needed to build relationships with centres and schools, nor do they enable us to take advantage of developments in other parts of the network or to collaborate effectively with other providers locally.

The 23 hours per week is sufficient for a facilitator to hold responsibility for approximately ½ of the participating ECE and schools. Although the other ½ receive communications and have access to online and physical Enviroschools resources, without the support and connections a facilitator provides, centres and schools often lose momentum and can be lost to the network. These are often ECE and schools that have done considerable work over time to develop a whole centre/school approach. This is not only wasteful for their centre/school community but can also have a flow on effect into the remainder of the network as the support that centres and schools within the network provide for one another reduces.

The large number of additional inquiries from centres and schools wishing to participate represents significant untapped potential in the network at a time when the world really needs young people and the adults around them to be thinking and acting creatively, sustainably and regeneratively.

Within a region that already operates on relatively low investment compared to other regions, WCC is one of the lowest investors. This is based on population, number of learning institutions and number of registered Enviroschools. (See Appendix 4.)

Under staff advice we waited until our 3-year contract came up for renewal this year, to attempt to address this capacity gap. With demand growing year by year, we have got further and further behind what is actually needed in the network. We now understand that the funding required to ensure a viable and strong network is unlikely to be possible through the 3-year contestable grants and we are looking for a better option.

Enviroschools is not generally funded through grants as they do not provide sufficient security to employ quality facilitators and do not enable a strategic approach to network growth. WCC is the only council in Te Upoko o te Ika a Māui, and one of only 2 in the country, that funds Enviroschools through grants.

A step change in funding is needed to ensure a viable and strong network

More facilitators with more hours

To address the capacity gap, we need to shift from one part-time facilitator role to two larger facilitator roles. This shift would put Wellington City Council in line with other large urban councils such as Dunedin and Auckland. See Appendix 5.

The chart in Appendix 2 outlines a range of funding level options for this year with an indication of what each would mean in terms of facilitator capacity to support the network.

While more moderate options would improve our ability to support the network, they would still leave Wellington City behind in relation to other parts of the regional and the nationwide network. Choosing a progressive option would enable us to create a strong base from which to continue to develop the network.

More security and the opportunity for a strategic approach

To be effective as a network, Enviroschools requires baseline funding.

Because Enviroschools is holistic and contributes across the board, it is difficult to source baseline funding from existing budgets. Attaching a budget line directly to the Strategy for Children and Young People could open up the opportunity to fund Enviroschools in a more strategic way.

In other large urban councils funding for Enviroschools often comes from a combination of general rates with a top up from things like a natural environment rate and/or Waste Levy. Something similar could work in WCC.

Why is investment needed now? What happens if we wait?

Continuing to fund Enviroschools at the status quo is a high-risk choice in terms of WCC getting value for funds invested.

WCC is already **a long way behind** cities in other parts of the country and there is potential for lost momentum in the Te Whanganui-a-Tara network. ECE and schools already involved that have done considerable work over a period of time to develop their practice are likely to lose momentum if we are not able to have a facilitator attached to them. This loss of momentum is compounded by the COVID pandemic.

Newly interested schools and centres often lose interest if we are not able to engage with them soon after their early inquiries.

Investment levels determine the size of the facilitation role(s) we can recruit for, which in turn affects who applies for them. We are currently in a position where we need to recruit. If we recruit now for a smaller role which could potentially be bigger in the next few years when more funds are available, we are losing the opportunity re-set role size(s) appropriately and recruit accordingly. This could affect the network for many years.

Let's step outside the status quo and choose a progressive funding option now. This opens up the opportunity for this vitally important network that delivers on WCC strategies to flourish, bringing hope and empowerment to our young people and their communities at a time where it is particularly needed. Let's Get EnviroSchools Moving!

Appendix 2 : Funding Level Options

Option	Facilitator Hours + expenses	Capacity to support current centres and schools	Capacity to support new centres and schools	Total Cost pa	Opportunities (O)/Risks (R)
Progressive Plus <i>High Opportunity</i>	2 facilitators @ 30 hrs pw each + Facilitator training covered, teacher release available, some event funding	✓	✓	\$160,000	(O) reach a wide range of ECE and schools (O) take advantage of energy and enthusiasm of new ECE and schools
Progressive <i>High opportunity</i>	2 facilitators @ 30 hrs pw each	✓	✓	\$142,000	(O) attractive facilitator roles that can support one another
Moderate Plus <i>Some opportunity</i>	1 facilitator @ 30 hrs pw, 1 facilitator @ 20 hrs pw	✓	✓ (potentially some)	\$122,000	Limited risk, limited opportunity.
Moderate <i>Some Risk</i>	2 facilitators @ 20 hrs pw each	✓	✗	\$102,000	(R) small roles limit appeal of role and pool of applicants
Status Quo Plus <i>High Risk/Low Opportunity</i>	1 facilitator @ 30 hrs pw each	✓ More than 1/2	✗	\$71,000	(R) lost opportunity for energy and enthusiasm from new schools and centres
Status Quo <i>High Risk/Low Opportunity</i>	1 facilitator @ 22 hrs pw each	✓ About 1/2	✗	\$60,000	(R) schools and centres that have done considerable work over a period of time are lost to the network (R) small roles limit appeal of role and pool of applicants

Appendix 3: Current Situation

- 41 schools and centres currently registered with the Enviroschools Network that have been involved and committed over time
- 20 actively facilitated
- 21 receiving communications and have access to on-line and hard copy resources but do not have access to a facilitator
- New interest from approximately 20 centres and schools in the last 18 months.

Appendix 4: Regional Investment Comparisons

Way of measuring investment	Result in comparison to other Territorial Authorities in the region	Comment
Total investment	WCC currently highest at \$60K	<ul style="list-style-type: none"> •NB. GWRC invest in the vicinity of \$200,000 •NB. Hutt City Council are potentially prepared to double their \$47K pa funding in 2022/23
Investment per member of population	WCC lowest	
Investment per number of learning institutions	WCC lowest	
Investment per registered Enviroschool	WCC, HCC, and UHCC are lowest	<ul style="list-style-type: none"> •NB. UHCC are at a different stage in the development of their network

Appendix 5: National Investment Comparisons

NB. There are only a small number of larger urban councils to compare to.

	Population	Registered Enviroschools	FTEs	Source
Dunedin City Council	133,000	36	1.8	Mix of waste levy and general rates
Auckland	1,700,000	292	over 20	General rates with top up from targeted natural environment rate
Wellington City	217,000	42	0.5	Multiyear contestable grants



Respondent No: 110

Login: Registered

Responded At: Apr 24, 2022 09:13:27 am

Last Seen: Apr 23, 2022 05:33:41 am

- Q1. **Full name:** Dieter Katz
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)** I am a Wellington City Council ratepayer
I live in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Establish a Community Housing Provider
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** Option A: Asset-owning CHP with broad responsibilities
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** Don't know
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** New landfill on top of the existing landfill (piggyback option)
- Q13. **Are there comments you would like to make about the landfill options?**
not answered
- Q14. **Rescheduling of the timing of some projects to recognise market and supplier constraints** Neutral don't know

Q15. **Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.** Do not support

Q16. **A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.** Do not support

Q17. **Increasing encroachment licence fees to better reflect their value** Do not support

Q18. **Additional funding for a full upgrade to Khandallah summer pool** Neutral don't know

Q19. **Removal of all library charges to remove barriers to accessing council libraries** Do not support

Q20. **Overall, do you support the proposed budget?** Neutral

Q21. **Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?**

12. Not extending on street paid parking time limits: Parking fees are fair where there is high demand for parking space. It ensures that only those who need the space get to use it. 13. \$20m Environmental and Accessibility Performance Fund: Reduction of carbon emissions is a laudable objective, but should be managed at the national level. Only national policies can ensure that the cost is shared fairly across the country. 14. Proposal to increase road encroachment fees based on the individual rateable land value of the adjoining property: I agree with the principle that the Council should make an economic return from the road reserve. I assume the intention is to make an economic return that is fair. But the economic value of the road reserve is not equal to the value of the adjoining rateable property. Where it is made available on short term lease, as is typically the case, it can't be used to support a residential or commercial building, which is what gives the adjoining land its value. The use of road reserve is typically limited to low value garages, etc, if it can be used at all. The policy should distinguish between places where there is demand for such land by only one person, and places where there is competitive demand. In the first case the value is low or negligible. A fair economic return is therefore very low. If a higher fee is set, then it is likely that some land will remain unused. It is true that owners of existing garages will most likely pay the fee even if it is extortionate, because they have already made an investment on the land which usually can't be recovered. But their willingness to pay the fee is no indication that the fee is set to give the Council a fair economic return. A higher value can be assumed for the land where there is competition for its use. The fee should ideally be set by auction before the land is allocated to a use. If a more pragmatic approach is preferred, or the land is already assigned to a use, then a fee based on half the per square meter value of the adjoining land could be justified as a rough approximation of its true value. 18. Removal of library charges: If overdue charges are removed, what incentive will borrowers have to return books? This will harm other people who will find it harder to obtain books. This seems an irresponsible proposal.

Q22. **You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)** not answered



Respondent No: 297

Login: Registered

Responded At: May 02, 2022 09:46:45 am

Last Seen: May 01, 2022 21:42:28 pm

- Q1. **Full name:** Gregory James Young
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** not answered
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** not answered
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** not answered
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** New landfill on top of the existing landfill (piggyback option)
- Q13. **Are there comments you would like to make about the landfill options?**
not answered
- Q14. **Rescheduling of the timing of some projects to recognise market and supplier constraints** Support

Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	Support
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	Neutral don't know
Q17. Increasing encroachment licence fees to better reflect their value	Do not support
Q18. Additional funding for a full upgrade to Khandallah summer pool	Neutral don't know
Q19. Removal of all library charges to remove barriers to accessing council libraries	Neutral don't know
Q20. Overall, do you support the proposed budget?	Don't know
Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?	
I wish to present my comments regarding the proposal to increase road encroachment fees by way of an oral submission.	
Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)	not answered

Full name

Mike Mellor

Phone number:



Are you making this submission as an individual or on behalf of an organisation?

Individual

Do you wish to speak to Councillors about your submission at an Oral Forum?

Yes

Increasing encroachment licence fees to better reflect their value

Do not support

You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)

Submission on encroachment charges

Introduction

I am the holder of an encroachment licence, and I fully support the proposal to charge encroachments fees at a rate that reflects the value of the land. The current system is effectively a subsidy given by ratepayers in general to encroachment holders: this is inequitable, unfair, economically unsound and unreasonable, and needs changing.

I have two caveats:

- encroachment agreements are not standard leases, and some provisions – e.g. I understand that the Council has the ability of the Council to give a month's notice at any time – should be amended, or recognised by a discount off the calculated rate or in another appropriate way;
- the introduction of encroachment fees based on land value would mean substantial increases for some people, and there should be transitional and/or needs-based provisions to ensure that the effects of the change on individuals are fair and just.

This submission is based on an email written (I believe) by Councillor Rush, based on a meeting attended by 10-15 residents, the Mayor and Deputy Mayor and Crs Rush and O'Neil. I was unaware of the meeting, which, given councillor attendance, was presumably held in the eastern suburbs, my area. If I had been aware, as the holder of an encroachment licence I would have made an effort to attend and boost the low attendance. I only became aware that it had happened by receiving the emailed notes second hand.

Responses to points arising from the meeting referred to above

I have added my comments after each point made in the original email, which I have put in italics and numbered for easy reference.

1. Currently these are charged on a flat rate at \$13 a sq metre and the current proposal is to double that rate. This was not considered unacceptable. But a further recommended option is to base the fee on the land value component of your home. For some this would increase the fee by 1,000% - \$300 p.a. to \$3,000. All agreed this would be inequitable.

My encroachment fee would increase by about 500%, but I completely disagree that such increases are inequitable. What is inequitable is the current practice of having a flat rate for all encroachments in the city, when clearly land values vary widely across the city and suburbs. Why should ratepayers in effect subsidise encroachers like me paying well below market rate for the land?

2. Improvements made by using road reserve as an encroachment are included in the overall home valuation which is then used to calculate rates. Consequently, encroachments are already adding value to the Council.

I don't know whether such improvements are included, but even if they are no value is being added to the Council. If that were in fact happening, the addition of an encroachment would increase total rates payments, but that is not the case. Valuations are used to

decide how the total rates take will be allocated across individual payers, with no effect on the total take, so there is no such added value.

3. The values of properties, and by extension an encroachment, is entirely down to the homeowners' efforts and expense – the Council should not receive added compensation for work and investment made by ratepayers. Furthermore, an encroachment has no value to anyone other than the ratepayer that has made the modifications for his/her use. It has no actual value to Council other than as an option in the future to retake the encroachment back for road widening or other Council purposes – we shouldn't confuse property values to the property market and the value of an option to the Council.

A major determinant of property values is the value of the land, which is certainly not “down to the homeowners' efforts”, and with current encroachment arrangements that land value is barely down to the homeowners' expense, either. Council is not receiving any compensation for work and investment made by ratepayers, just for supplying the land (as would be expected of any other landowner, so why not the Council?)

Encroached and road reserve land has significant value to others apart from a particular ratepayer, such as directly to the Council, as an asset that can be disposed of; and to the community, as part of the urban realm, with recreational, biodiversity, stormwater attenuation, traffic noise attenuation, aesthetic etc. values and uses. Any modifications can be made only by using the Council's land, and it is unreasonable that any landowner should not be compensated appropriately for providing land.

There is no confusion between property values and the value of an option to Council, since an option open to Council is to place the encroached land on the market. This would give a much better return to ratepayers as a whole (not that I'm advocating wholesale disposal of council land), demonstrating the effective subsidy currently being given to encroachment holders.

4. Many of these encroachments provide a positive value to the Council, for example by taking cars off the road. An unintended consequence of a large increase might be that the encroachments are discontinued and cars being parked on the road.

Some may do this; most don't. Car decks, garages etc. need to be accessed from the carriageway, which involves a vehicle crossing being built over the footpath and the resulting stretch of kerbside being unavailable for parking. A car deck or garage will often simply relocate a parked car rather than increasing the total amount of parking.

5. Some encroachments aren't really used by some homeowners. For example, WCC has sensibly fenced off many parts of our area adjacent to footpaths. The resultant confined area seems to show up as an encroachment because it can only be used by the landowner. This seems unfair.

"Seems to show up" is odd phrasing: encroachments have to be applied for and then paid for, so they are the result of a conscious decision by the encroachment holder, who can decline the opportunity.

6. One resident said her land value amounted the vast majority of her property's overall value with her home valued at just \$40,000.

This shows how valuable the land is, and how inequitable it is that the low charges encroachment holders pay mean that they are effectively being subsidised by ratepayers as a whole.

7. Another mentioned that on her calculations the resultant few metres of encroachment would amount to 40% of her annual rates bill which doesn't sound equitable.

See comment on point 7 above: it's the current situation that's inequitable. Clearly in both these cases some form of transitional or needs-based assessment could be appropriate.

8. There was general alignment that road reserve wherever it is the City has the same per metre value, irrespective of what the adjacent property might be valued.

This may make some sense with respect to the value of the land as road reserve, but even that is open to challenge since road reserve status is not immutable, and it can be put to others uses – e.g. encroachment or disposal. Land values vary widely across the city: for example, the value of land on a rural road such as South Makara Rd is hardly equivalent to the value of the land on a city-centre street like Lambton Quay, and I can see no sound reason why encroachment fees should be insulated from this differential, to the detriment of many.

9. There was also discussion about the practical implications of having a bespoke fee for each encroachment and if this might add to the administration costs unduly – something for WCC to consider.

Administration costs are important, but so is setting fees at a fair and equitable level. Fees already are bespoke to an extent, varying according to land area occupied: adding a second variable in the form of the rating valuation of the land per square metre would mean calculating that first (including at every revaluation) and then applying it – harder, but not exactly rocket science, and producing a much better return to ratepayers in general.

10. So the overwhelming response to basing encroachment values on then adjacent land values was negative.

An “overwhelming response” from the small group of people that attended the meeting. I suspect that beneficiaries of the current system, renting land from their fellow ratepayers at cut-price rates, would have greater motivation to attend the meeting than non-beneficiaries.

Conclusion

In summary, I submit that the Council has an obligation to act in a fair, equitable, reasonable, and economically and financially justifiable way. The current encroachment charging system is none of these, undervaluing Council-owned land to give a particular group of ratepayers a subsidy not available to many others. A council with any pretensions to good economic and social goals needs to rectify this unfair and anomalous situation.

I would like to be heard in support of this submission.

Michael Mellor
15 May 2022



Respondent No: 311

Login: Registered

Responded At: May 02, 2022 21:27:58 pm

Last Seen: May 02, 2022 09:01:01 am

Q1. Full name:	Anna Pendergrast
Q2. Phone number:	██████████
Q3. Are you making this submission as an individual or on behalf of an organisation?	Individual
Q4. Please name your organisation	not answered
Q5. Are you a City Housing tenant?	No
Q6. What is your connection to Wellington? (tick all that apply)	I am a Wellington City Council ratepayer I live in Wellington I work in Wellington I own a business in Wellington
Q7. Do you wish to speak to Councillors about your submission at an Oral Forum?	Yes
Q8. Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider	Establish a Community Housing Provider
Q9. If the Council did establish a Community Housing Provider, which option do you support?	Option B: Leasehold CHP with broad responsibilities
Q10. If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?	Community Trust
Q11. Are there comments you would like to make about the changes to city housing options?	<p>I'm not sure I understand the barriers to the IRRS funding council social housing tenants -- it does seem a significant workaround to establish a new organisation in order to access this funding. I assume that the council has advocated for government funding through this avenue, it would be great to have a clear explanation of this and why the IRRS is limited in scope for who can access it.</p>
Q12. The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?	New landfill on top of the existing landfill (piggyback option)

Q13. Are there comments you would like to make about the landfill options?

I think it is important that we do not lock ourselves into approaches that require us to continue to produce (or import!) current levels of waste. Therefore, I think the new landfill (piggyback option) is the best option presented but want to make sure that the ecological effects of this work are managed in accordance with the ecological effects management hierarchy. Compensation is the most risky and least certain option and should be a last resort when all other avenues have been exhausted.

Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints Support

Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings. Support

Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington. Support

Q17. Increasing encroachment licence fees to better reflect their value Support

Q18. Additional funding for a full upgrade to Khandallah summer pool Support

Q19. Removal of all library charges to remove barriers to accessing council libraries Support

Q20. Overall, do you support the proposed budget? I support the proposed budget

Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?

I highly support the removal of library charges, as the current system privileges people who can afford to pay late fees and locks people out from borrowing books and other services if they cannot afford to pay.

Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23) not answered

Full name

Christopher Finlayson

Phone number:

[REDACTED]

Do you wish to speak to Councillors about your submission at an Oral Forum?

Yes

Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?

Submission on the proposed changes to annual rental fees for road encroachment.

1. I own a property at [redacted]. I have received a letter dated 7 April inviting me to make a submission on the above matter. This is my submission. I know there is a prescribed form somewhere on your website but I couldn't find it. I am sure you will agree that substance is more important than form and that the fact I haven't responded using your form doesn't invalidate my submission.
2. I think the Council's proposal is meritless for a number of reasons. First, no rationale is provided for the proposed change. The letter simply says that the current fees are considered low. No reasons for that statement are provided other than that the fee structure hasn't been reviewed for some years and land values have increased. These are insufficient grounds to warrant a doubling of the fee. Officials should have provided comparisons with the CPI and other indices over the ten year period. For example, the Reserve Bank calculator shows that the CPI increased by 20.3% from Q1 2012 to Q1 2022.
3. Secondly, general land values may have increased but does this apply to all Council road reserve, for example, the land in front of my home? It is essentially worthless. When I bought the property in 2018, the Council reserve was covered in very low quality trees and bush. At considerable expense to me, the land has been beautified. My land value has doubtless increased but the same cannot be said of Council reserve. Can someone provide me with grounds for that assertion? I have done the Council a favour by improving a scruffy berm and properly planting the area.
4. Thirdly, the proposal suggests that Council should make an economic return from the asset where appropriate. It is hard to disagree with that statement as a general proposition, but I refer to the words "where appropriate". In many cases like, for example, the land in front of my property, there can be no prospect of an economic return. It is essentially wasteland which I have taken the effort to improve and beautify. By reference to my property, I would be interested to see the Council's reasoning to support the proposition that this land has an economic value. The Council should

encourage residents to beautify berms, thus saving it the burden of spending ratepayer revenue on keeping them free of noxious weeds and reducing fire risk.

5. Finally, I note that the Council is concerned to ensure prudent stewardship and efficient and effective use of its resources in the interests of its district. I welcome the Council's acknowledgement that it must be a prudent steward in this regard. I fail to see how an unprincipled and arbitrary increase in this fee represents prudent stewardship of what is in reality nothing more than wasteland. It may well apply if the land had a use but, in my case, it doesn't. The Council must show why each reserve has an economic value justifying such a dramatic fee increase. Formulaic generalised statements about economic value are unhelpful.

6. In the absence of a proper rationale, I have to conclude that there is no principled basis for such a dramatic fee increase, and that it is motivated by the Council's need for additional funding. There must be a reasoned justification for this proposed fee increase and it is not apparent from the letter to citizens or the background material.

7. I wish to make an oral submission.



Respondent No: 612

Login: Registered

Responded At: May 13, 2022 16:10:46 pm

Last Seen: May 13, 2022 04:05:22 am

- Q1. **Full name:** Jane Alexandra Thomassen
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** not answered
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** not answered
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** not answered
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** not answered
- Q13. **Are there comments you would like to make about the landfill options?**
not answered
- Q14. **Rescheduling of the timing of some projects to recognise market and supplier constraints** not answered

Q15. **Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.** not answered

Q16. **A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.** not answered

Q17. **Increasing encroachment licence fees to better reflect their value** Do not support

Q18. **Additional funding for a full upgrade to Khandallah summer pool** not answered

Q19. **Removal of all library charges to remove barriers to accessing council libraries** not answered

Q20. **Overall, do you support the proposed budget?** not answered

Q21. **Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?**

Please refer to my attached letter regarding proposed changes to encroachment fees

Q22. **You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)**

[REDACTED]

Jane & Remy Thomassen

13 May 2022

Dear [REDACTED]

Consultation on the proposed changes to annual rental fees for road encroachment

Thank you for your letter dated 7 April 2022. Outlined below is our response to the proposals on the above topic. Please note, I would like to speak to my submission, if I am available at the time.

Background to my Submission

The Council's Encroachment policy's introductory statement says "Wellington's topography is unique with steep hills and little flat land. Its street layout was largely derived from English town planning processes. Often it did not take the steepness of the land into account. As a result, the formed roads are often much narrower than the width of the land legally designated as road"

This statement recognises that for most of the resulting road reserve, there are few if any practical uses for such land. Fortunately the policy does recognise that there are potential land uses that could benefit the adjacent properties without being to the detriment of public access and use of that land. These uses include:

- provide vehicle or pedestrian access to a property
- enhance outdoor living, recreation, private or public amenity values
- improve public safety and street use – for example provide off-street parking
- improve security

At the time that we built our property, it was a requirement of the consents we needed to provide off street parking. Due to the topography around our house this necessitated building car decks, stairways and driveways which had to encroach across the road reserve. Consequently we are now in possession of an encroachment licence.

In addition we were required to implement a landscaping plan at our own cost for the road reserve adjacent to these encroachment. This plan resulted in a beautified neighbourhood as it replaced the overgrown bank of noxious plants.

We have already gone to significant expense to meet Council requirements, with the result of improving the feel of the neighbourhood, while adding to the Wellington housing stock and minimising the number of cars already parked on Wellington's narrow streets.

The Proposal

In response to the specific proposals, outlined in your letter dated 7 April, I would note the following:

- *increase the annual fee for a road encroachment licence from \$13.33/m² to \$26.66/m² (excluding GST) from 1 July 2022 as an interim measure to support the management of general rate increase.*

I have been unable to find anywhere on the Council's website that explains how the current fee per square metre is derived. It is therefore hard to comment on this proposal, beyond that a 100% fee increase without any real explanation seems to be excessive, particularly given even the talk of rising inflation rates hasn't yet reach double digits.

For reasons outlined later, I also do not believe this should be an interim measure. Having a fixed rate of fee that is kept affordable could actually benefit the Council though having more encroachment licences for further offstreet parking and the like which would have further flow-on benefits to the Council and the public.

I would also like to note that your website states that the current fee is \$15.33/m² and not \$13.33m² as stated in your letter.

I appreciate that the Council has significant cost constraints, and that current fees may be low and requiring review. However, I cannot see how that justifies

- *increase the lease fee for the airspace and subsoil encroachments by 100 percent from 1 July 2022 to reflect the added property value to the lease holders.*

I have no idea what fees are currently paid for airspace and subsoil encroachment as both your letter and website are silent on the matter. I can only reiterate that a 100% increase appears excessive, and add that such fees feel like double dipping (does Council not benefit from the additional rates derived from a higher valued property?)

- *consider setting the road encroachment fee based on the individual rateable land value of the adjoining property in the 2024/33 Long Term Plan.*

I do not support this approach.

Assuming that the pictures in the encroachment policy are reflective of the majority of encroachments in Wellington, it would appear that our situation is not unique, and approved encroachments most often will be of added value to the adjacent property.

However, that does not mean that the road encroachment fee should be based on the individual rateable land value of the adjoining property for the following reasons:

- While there have been significant increases in land values, there needs to be recognition (in line with statements in the Encroachment policy) that road reserve has no useable value to the Council. It is more likely to be an expense particularly where it requires vegetation and pest control
- The benefit to adjoining property of the encroachment will be factored into the building component of the property's rateable value through the benefit of the appurtenant

structures. To value this land for the encroachment fee calculation would be double dipping on land that is otherwise a 'dead asset'.

Regards

Jane Thomassen



Respondent No: 466

Login: Registered

Responded At: May 10, 2022 23:09:48 pm

Last Seen: May 10, 2022 10:54:14 am

- Q1. **Full name:** Lucy Rowling
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
I own a business in Wellington
I study in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Establish a Community Housing Provider
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** Option A: Asset-owning CHP with broad responsibilities
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** Community Trust
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** New landfill on top of the existing landfill (piggyback option)

Q13. Are there comments you would like to make about the landfill options?

Waste to incinerator options have shown in Europe to not be a viable solution and are starting to be decommissioned. We need to do the best job we can re carbon emissions and solid waste management, and that is not incineration which creates perverse disincentives around reducing waste. We need to pay our own way for the waste we generate and provide financial support for residents who are less able to afford to, while simultaneously reducing waste-generating consumption. Shipping it out of town is ignoring the issue of responsible production and consumption.

Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints Neutral don't know

Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings. Support

Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington. Support

Q17. Increasing encroachment licence fees to better reflect their value Support

Q18. Additional funding for a full upgrade to Khandallah summer pool Support

Q19. Removal of all library charges to remove barriers to accessing council libraries Support

Q20. Overall, do you support the proposed budget? Don't know

Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?

We need to increase support for public transport and reduce support options for private vehicles in the city. We need to engage with the UN Sustainable Development Goals of Agenda 2030 in all its dimensions particularly the intent of equality for all, which will require appropriate resources assigned to source and share disaggregated data based on gender race and all dimensions of potential discrimination according to the UN Convention on Human Rights, and adjust the budget accordingly.

Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23) not answered



Respondent No: 139

Login: Registered

Responded At: Apr 26, 2022 20:29:21 pm

Last Seen: Apr 26, 2022 08:13:25 am

- Q1. **Full name:** Michael Ellis
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Establish a Community Housing Provider
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** Option B: Leasehold CHP with broad responsibilities
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** Don't know
- Q11. **Are there comments you would like to make about the changes to city housing options?**

I support the move to make the Council's Community Housing fully sustainable through a CHP model. I am concerned that the existing housing is running a deficit of \$10m per year. With the transition to a CHP without any asset transfer the Council needs to be transparent on any initial costs that will be passed onto Ratepayers at the time of transfer, if any on-going subsidy will work, or the risk of future bailouts being required if there are future deficits. It is also unclear about how ownership of future housing developments will be allocated between a CHP and Council. Council needs to make these decisions now so that Ratepayers can understand the model and Councillors are accountable to residents for the decisions made.
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** not answered

Q13. Are there comments you would like to make about the landfill options?

not answered

Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints

not answered

Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.

not answered

Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.

not answered

Q17. Increasing encroachment licence fees to better reflect their value

not answered

Q18. Additional funding for a full upgrade to Khandallah summer pool

not answered

Q19. Removal of all library charges to remove barriers to accessing council libraries

not answered

Q20. Overall, do you support the proposed budget?

not answered

Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?

not answered

Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)



Respondent No: 44

Login: Registered

Responded At: Apr 19, 2022 22:08:04 pm

Last Seen: Apr 19, 2022 09:41:08 am

- Q1. **Full name:** Glenn Caulfield
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Don't know
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** not answered
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** not answered
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** New landfill on top of the existing landfill (piggyback option)
- Q13. **Are there comments you would like to make about the landfill options?**
not answered
- Q14. **Rescheduling of the timing of some projects to recognise market and supplier constraints** Support

Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	Support
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	Support
Q17. Increasing encroachment licence fees to better reflect their value	Do not support
Q18. Additional funding for a full upgrade to Khandallah summer pool	Do not support
Q19. Removal of all library charges to remove barriers to accessing council libraries	Neutral don't know
Q20. Overall, do you support the proposed budget?	I oppose the proposed budget
Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?	
<p>I have a strong push back to the encroachment changes that are not only a 100% near immediate increase, then are planned to move to valuation based for airspace and subsoil. A move in that direction was previously proposed years ago and I believe got strong pushback, as it should this time. Encroachments are often theoretical. The existence of them does not hinder people or activity, nor deny council an income that would have happened if the encroachment did not exist. Encroachments can have no practical way to be remediated. An airspace encroachment from a balcony several floors up simply cannot be made to go away. The owner (encroacher?) has no ability to remove the encroachment. Encroachments can sometimes be a value add (in a non monetary sense), some are definitely of no hinderance, and many represent no income to the encroacher. So to charge a significant cost, especially in those cases of no negative effect of the encroachment, no ability to remove it, and deriving no income from it, is clear unfair. The rationale put forward is purely monetary. To try and make the general rate increase look less (but still raising the same amount of overall revenue, and to ultimately link it to asset value. That is an accounting construct, not a human or environmental measure. It's the same piece of land or airspace as before, not used in any different way, and in cases I am referring to does not represent a monetary gain to the encroacher nor a hinderance to others. Putting an accounting economic rationale over that is chalk and cheese, with clearly unfair outcome.</p>	
Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)	not answered




Respondent No: 703

Login: Registered

Responded At: May 15, 2022 16:42:48 pm

Last Seen: May 15, 2022 04:15:28 am

- Q1. **Full name:** George Hampton
-
- Q2. **Phone number:** [REDACTED]
- Q3. **Are you making this submission as an individual or on behalf of an organisation?** Individual
- Q4. **Please name your organisation** not answered
- Q5. **Are you a City Housing tenant?** No
- Q6. **What is your connection to Wellington? (tick all that apply)**
I am a Wellington City Council ratepayer
I live in Wellington
I work in Wellington
- Q7. **Do you wish to speak to Councillors about your submission at an Oral Forum?** Yes
- Q8. **Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider** Don't know
- Q9. **If the Council did establish a Community Housing Provider, which option do you support?** not answered
- Q10. **If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?** not answered
- Q11. **Are there comments you would like to make about the changes to city housing options?**
not answered
- Q12. **The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?** Don't know
- Q13. **Are there comments you would like to make about the landfill options?**
not answered
- Q14. **Rescheduling of the timing of some projects to recognise market and supplier constraints** Neutral don't know

Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	Support
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	Neutral don't know
Q17. Increasing encroachment licence fees to better reflect their value	Do not support
Q18. Additional funding for a full upgrade to Khandallah summer pool	Neutral don't know
Q19. Removal of all library charges to remove barriers to accessing council libraries	Neutral don't know
Q20. Overall, do you support the proposed budget?	I oppose the proposed budget
Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?	
I oppose the proposed budget on the basis on the proposed changes to the annual rental fees for road encroachment. Please refer to attached submission relating to this issue.	
Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)	

Submission on the Proposed Changes to the Annual Rental Fees for Road Encroachments

Introduction

1. My name is George Hampton. I am a resident of Miramar having purchased my first home (with my partner) in August 2021.
2. This submission relates solely to Council's proposed changes to the annual rental fees for road encroachments.

Proposed Changes

3. I understand that Council has proposed the following:
 - i) *Increase the annual fee for a road encroachment licence from \$13.33/m² to \$26.66/m² (excluding GST) from 1 July 2022 as an interim measure to support the management of general rate increase;*
 - ii) *Increase the lease fee for the airspace and subsoil encroachments by 100% from 1 July 2022 to reflect the added property value to lease holders; and*
 - iii) *Consider setting the road encroachment fee based on the individual rateable land value of the adjoining property in the 2024/33 Long Term Plan.*

Road Encroachment Objectives

4. The objectives of Council's Road Encroachment and Sale Policy dated September 2011 are to:
 - i) Facilitate property owners making encroachments where, in the view of the Council, these are expected to have overall net benefits;
 - ii) Establish a fee structure that reasonably reflects the degree to which benefits occur privately, publicly or some combination of the two; and
 - iii) Aid the Council in meeting its legal obligations.

Road Encroachment Principles

5. The principles that are taken into account by Council when assessing whether or not to allow an encroachment are as follows:
 - i) *Recognising that road reserve is Council-owned land, the Council will seek to make an economic return from this asset where appropriate;*
 - ii) *Encroachments with greater public and/or private benefits than detriments should generally be accepted; those with greater detriments than benefits generally should not;*
 - iii) *Encroachments with low public but high private benefit, especially those that exclude public use, should generally incur higher rental charges;*
 - iv) *Encroachments for commercial properties should incur higher rental charges than non-commercial encroachments;*
 - v) *People who are materially affected by a proposed encroachment should be consulted and their views considered when decisions are made;*
 - vi) *Encroachments that provide access to properties are broadly in keeping with the original purpose of roading reserves;*
 - vii) *Encroachments should not interfere with any reasonably foreseeable future public uses of the particular road reserve or should be removable;*
 - viii) *Encroached land should be used for purposes that are in line with, and preferably support, Council's other plans, policies and objectives;*
 - ix) *While not limiting the generality of the above principle, amenity values, cultural values, and significant ecological values should not be significantly degraded by the encroachment; and*
 - x) *Road reserve contributes positively to the overall look and feel of Wellington.*

Private & Public Benefits

6. I consider the following private benefits result from allowing encroachments in general (particularly in relation to my own encroachment):
 - i) Allows off-street parking; and
 - ii) Allows safe ingress/egress to/from the property.

7. I consider that the following public benefits from allowing encroachments in general (including benefits directly to Council):
 - i) Allows off-street parking, thus removing parked vehicles from the existing road carriageway. This results in less disruption to traffic movements on narrow roads where many encroachments exist;
 - ii) Increases general rates pool available to Council by enabling development of land that would previously have been uneconomic to develop (i.e., without encroachments, many properties would not exist, meaning Council would be drawing upon a smaller general rates pool). Obviously, a larger general rates pool means Council has a greater budget to achieve positive outcomes for Wellington City;
 - iii) Reduction in general expenditure by Council on maintaining areas of public land. The contract in place for all lease holders explicitly places all maintenance duties on the lease holder. This means that lease holders are undertaking a public service each time they maintain the land upon their encroachment is located (which is often a time consuming task);
 - iv) Many lease holders have planted their encroachments up, thus increasing biodiversity;
 - v) An encroachment does limit public access to specific areas of public land. However, in effect, this also removes the health and safety risk associated with public access on areas of steep land, and therefore significantly reduces Council risk in this space; and
 - vi) By allowing an encroachment, Council is conceding that there is an overall net benefit to Wellington City.
8. As detailed in paragraph 7., significant public benefits occur as a result of allowing encroachments.

Rates & Value of the Land (Double Dipping)

9. By allowing an encroachment, Council are, in effect, conceding that there is little public benefit associated with the piece of land subject to the encroachment (i.e., Council consider that the encroachment will result in overall net benefits to Wellington City). Therefore, to consider setting the road encroachment fee based on the individual rateable land value of the adjoining property is misguided, particularly given the:
 - i) Unprecedented financial conditions over the past 24-30 months which contributed to a significant increase in house prices; and
 - ii) The forecast decrease in house prices in the foreseeable future.
10. If sold on the open market, the piece of land subject to the encroachment would not reach a similar value to the adjoining property on a \$/m² basis. This is because the piece of land is not of value to anyone with the exception of the existing property owner (i.e., the generally small nature of the encroachment and the restrictive planning rules mean there would be no other prospective buyers).
11. All property owners pay rates based on the rateable value (RV) of the property. The RV is an assessment of a property's value in relation to current market values. The market value, and therefore RV, takes into account factors such as an encroachment (i.e., a property's value would be significantly lower if an encroachment did not exist).
12. It therefore manifestly unjust to increase the encroachment fee when it is already accounted for within the general rates via the property RV. In addition, if the proposed changes were to occur the Council would in effect be "double dipping" – charging rates on the same thing twice.
13. The term "added property value" is misleading. For those property owners who purchased recently, like myself, there is a potential for house prices, and therefore equity, to be decreasing significantly. Therefore, there is no "added property value" for some lease holders.

Issues with Consultation

14. I note that I requested a meeting via email with my local Eastern Ward Councillors on Thursday 21 April. I am yet to receive a response from any of the three Eastern Ward Councillors. I am

therefore concerned as to current engagement levels of all Councillors with respect to the impact that this proposal could have on their constituents.

15. I meet with Council staff (Shu Huang, Geoff Lawson, and Raewyn Picken) on Thursday 12 May at 14:00 to discuss the proposed changes to the annual rental fees for encroachments.
16. Council staff noted that out of 5,000 letters and 2,000 emails sent out only one complaint was received about not having all of the required information.
17. I informed them of the following:
 - i) The fact that I had not received a copy of the letter detailing the proposed changes or an email (I was merely lucky that my partner had forwarded me the email she had received from Council about the proposed changes). One can only assume that there would be many people who have an encroachment who are not aware of the proposed changes;
 - ii) A colleague who had only received one page of the two-page letter; and
 - iii) At least one other person who had complained (via an email to Shu Huang) as a result of the issue documented in paragraph 16.ii).
18. I note that Council staff responded with the following:
 - i) That of the three email addresses they held for my address, two were incorrect (One can only assume that this problem is widespread); and
 - ii) That some people, presumably my colleague, would not have known to turn the page over to see the second page (This argument is preposterous and I was astounded that a Council staff member would suggest this).
19. These responses were inadequate in my opinion and I do not believe that all lease holders will be aware of the proposed changes to the encroachment fees.

Methodology

20. During my meeting with Council staff, I asked what alternative methodologies or assessments were undertaken to ascertain that the proposed changes to the encroachment fees are the best option going forward (e.g., cost benefit analyses on various assessments ranging from disbanding the encroachment team and no annual charges to an annual fee of \$10,000). No alternatives were provided. This is despite Council putting forth four options in the document titled “review of Fee Structure for Road Encroachment Licences and Leases” (i.e., Council staff involved in the meeting were either not aware of the four options or not willing to discuss them). This, in my opinion, is negligent public service from public officials.
21. Having reviewed the four options, I consider that the approach taken is fundamentally flawed as all four options focus on increasing revenue. Not one option, for example, explores (at least in part) reducing Council expenditure on encroachment administration. I consider that this inappropriate – all options should have been on the table and analysed in detail, and therefore I don’t think that Council as reached the best solution in terms of reducing the impact on general rates.
22. I therefore urge Council to go back to the drawing board and assess all available options. I am more than willing to assist in this process.

Timing

23. Given there are currently significant pressures on rate payers as a result of inflation and the general cost of living in Wellington City, I consider the proposed changes to annual rental fee for encroachments to be at best bad timing and at worst immoral (given all the work land owners do in maintaining them, and therefore reducing cost to Council).

Summary

24. I oppose the proposed changes to the annual rental fees for the reasons documented in this submission above.

Yours sincerely,

George Hampton



Respondent No: 429

Login: Registered

Responded At: May 09, 2022 07:15:13 am

Last Seen: May 08, 2022 19:01:47 pm

Q1. Full name:	Steven Anderson
Q2. Phone number:	not answered
Q3. Are you making this submission as an individual or on behalf of an organisation?	Individual
Q4. Please name your organisation	not answered
Q5. Are you a City Housing tenant?	No
Q6. What is your connection to Wellington? (tick all that apply)	I am a Wellington City Council ratepayer
Q7. Do you wish to speak to Councillors about your submission at an Oral Forum?	Yes
Q8. Would you prefer the Council to retain City Housing through increasing rates and borrowing or by establishing a Community Housing Provider	not answered
Q9. If the Council did establish a Community Housing Provider, which option do you support?	not answered
Q10. If the council established a Community Housing Provider, do you agree with the council's preference for a community trust, rather than a company or limited partnership?	not answered
Q11. Are there comments you would like to make about the changes to city housing options?	not answered
Q12. The council's preference is for a new landfill on top of the existing landfill (piggyback option), rather than waste to energy incineration or having no residual waste facility in Wellington City. Which option do you prefer?	not answered
Q13. Are there comments you would like to make about the landfill options?	not answered
Q14. Rescheduling of the timing of some projects to recognise market and supplier constraints	not answered

Q15. Not proceeding with previous plans of extending on street paid parking time limits on Friday and Saturday evenings.	not answered
Q16. A \$20m Environmental and Accessibility Performance Fund that provides financial support for those building energy efficient or sustainable homes and buildings in Wellington.	not answered
Q17. Increasing encroachment licence fees to better reflect their value	Do not support
Q18. Additional funding for a full upgrade to Khandallah summer pool	not answered
Q19. Removal of all library charges to remove barriers to accessing council libraries	Support
Q20. Overall, do you support the proposed budget?	I support the proposed budget
Q21. Do you have any comments about the upcoming decisions, fees and user charges changes, other plans or any other general feedback on our annual plan and budget?	
<p>With regards to the encroachments - let's call this what it is - a revenue grab. The council as a monopolist can unilaterally double fees in one year - where does this money come from? How does the council feel it is appropriate to double fees? The previous year the council increased rates by 14%, where does council think this money comes from? The land in my case is the essentially the road reserve out the front of my house. Should I relinquish the lease this would doubly affect council. No rental return on the asset and then they would need to maintain the land. I have offered to buy the land twice from the council (which would be an even better solution for the council). They would get the sale of land revenue and then be legitimately change rates on the land - essentially a far better result as there would be two sources of revenue. To suggest that the annual rental fee should be based on the rateable value of the land is ludicrous. The first problem with this argument is that the land most definitely doesn't have that value. It is road reserve, it is not useable land. Should the council offer long term leases on the land then a stronger argument could be made on the value of the land. However annual leases provide no security in either direction and ironically reduce the value of the leases. The council argues in its justification that the economic return is 'low'. On what basis is that claim made? In comparison to what is this claim made? Using AKL and CHC are poor examples. Why for example doesn't council charge for access encroachments which are currently exempt? Surely there is another fine source of revenue for council to exploit, and surely that is the fairest way to approach things. If I receive economic value, then access encroachments do as well, and should be charged.</p>	
Q22. You can attach any other document supporting your submission here. (Please ensure that the information is on the Annual Plan 2022/23)	not answered