

HBRC Revenue & Financing Policy review: Your Community Your Rates consultation 1 December 2023 to 28 January 2024

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Submitter ID: 495

Hearing? No

Ben Wylie-van Eerd

Constituency: Out of region

Type of property/ies: Residential

1. *Do you support the proposed move from LV to CV for the general rate?* **No**

Moving from land value to capital value would be a regressive move, causing poorer people to pay more in rates and lowering rates on the well off. This is not a fair way to raise revenue for public services. Changing to a capital value based rating also strongly discourages landowners from building and developing, as doing so increases their rates bill. This results in insufficient housing being built, and high housing costs for residents. It also results in centres that are not productive and vibrant. A couple of examples of this in my home town of Wellington are the very run down mall in the heart of Johnsonville, and the reading cinema building that is still disused in the heart of Courtenay Place.

2. *Do you support the regional economic development rate proposal?* **Don't know**

3. *Do you support the flood protection and drainage schemes proposal?* **Don't know**

4. *Do you support the passenger transport rate proposal?* **Don't know**

5. *Do you support the freshwater science charges and new targeted rate proposal?* **Don't know**

6. *Do you support the sustainable land management and biodiversity/biosecurity proposal?* **Don't know**

7. *Do you support the additional policies for rates remission and postponement?* **Don't know**

8. *Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?* -

Submitter ID: 496

Hearing? No

Bruce McGregor

Constituency: Heretaunga-Hastings

Type of property/ies: Rural Lifestyle

1. *Do you support the proposed move from LV to CV for the general rate?* **Yes**

It's fair.

2. *Do you support the regional economic development rate proposal?* **No**

Commercial ratepayers (tourism et al) are the beneficiaries of this fund and we do not think it makes sense to make the balance of ratepayers share the cost. We fail to see how the promotion of tourism etc can "enhance our lifestyle or increase our sense of security" as claimed.

3. *Do you support the flood protection and drainage schemes proposal?* **Don't know**

4. *Do you support the passenger transport rate proposal?* **Don't know**

5. *Do you support the freshwater science charges and new targeted rate proposal?* **Don't know**

6. *Do you support the sustainable land management and biodiversity/biosecurity proposal?* **Yes**

Everyone benefits so everyone should share the cost.

7. *Do you support the additional policies for rates remission and postponement?* **Don't know**

8. *Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?* -

Submitter ID: 497

Hearing? No

Sarah Douylliez

Constituency: Heretaunga-Hastings

Type of property/ies: Rural

1. *Do you support the proposed move from LV to CV for the general rate?* **No**

Given that forestry is not accounted for properly and that the horticultural heart of Hawkes Bay is to receive an increase it feels as if you do not value the contribution, stress and hard work those who grow fruit or vegetables here put in and how it supports the region. Huge pressures on this area at the moment and adding an extra cost may be the last straw for many.

2. Do you support the regional economic development rate proposal? **No**

Surely everybody benefits from this.

3. Do you support the flood protection and drainage schemes proposal? **Don't know**

It would be reassuring to know that the council intends to drastically improve its services in this area after various glaring errors last year. River monitors going home at 5pm when cyclone coming and monitoring systems failing comes to mind.

4. Do you support the passenger transport rate proposal? **Yes**

5. Do you support the freshwater science charges and new targeted rate proposal? **Don't know**

Hard to believe anything is ever done given that we have been waiting for our water consent renewal for more than 5 years. And we do not discharge.

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Yes**

7. Do you support the additional policies for rates remission and postponement? **Don't know**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 498

Hearing? No

Carol Millward

Constituency: Heretaunga-Hastings

Type of property/ies: Lifestyle

1. Do you support the proposed move from LV to CV for the general rate? **No**

2. Do you support the regional economic development rate proposal? **No**

3. Do you support the flood protection and drainage schemes proposal? **No**

4. Do you support the passenger transport rate proposal? **No**

5. Do you support the freshwater science charges and new targeted rate proposal? **No**

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **No**

7. Do you support the additional policies for rates remission and postponement? **No**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 499

Hearing? No

Kishan Premadasa

Constituency: Ahuriri-Napier

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? **No**

Rates are already high enough. This change will cost my household more. Maybe look at reducing wasteful spending at Council and cut costs internally.

2. Do you support the regional economic development rate proposal? **No**

3. Do you support the flood protection and drainage schemes proposal? **Don't know**

4. Do you support the passenger transport rate proposal? **Don't know**

5. Do you support the freshwater science charges and new targeted rate proposal? **Don't know**

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Don't know**

7. Do you support the additional policies for rates remission and postponement? **Don't know**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Boyd Gross

Constituency: Ahuriri-Napier

Type of property/ies: Other

1. *Do you support the proposed move from LV to CV for the general rate?* **No**

See Attached

2. *Do you support the regional economic development rate proposal?* **Yes**

Yes but not under a Capital Value rating model

3. *Do you support the flood protection and drainage schemes proposal?* **Yes**

Yes but not under a Capital Value rating model

4. *Do you support the passenger transport rate proposal?* **No**

5. *Do you support the freshwater science charges and new targeted rate proposal?* **Yes**

Yes but not under a Capital Value rating model

6. *Do you support the sustainable land management and biodiversity/biosecurity proposal?* **Yes**

Yes but not under a Capital Value rating model

7. *Do you support the additional policies for rates remission and postponement?* **Don't know**

Need further information and detail

8. *Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?* See attached

6 January 2024

Hawke's Bay Regional Council
Private Bag 6006
NAPIER 4142

RE: Your Community Your Rates – Submission on Land Value v Capital Value Rating

1.0 Background

- 1.1 I have prepared and submit the following as a resident of Hawke's Bay and in my personal capacity. I make the following disclosures and statements.
- 1.2 I am a Registered Valuer based in Hawke's Bay who has been active in the valuation of rural land within New Zealand for over 30 years. The views expressed in this submission are mine and not that of my employer.
- 1.3 I am a Director of Headway Systems Ltd a private software and data company that purchases property transactional data from Territorial Local Authorities and other parties. The data is then matched and cleansed and repackaged for sale to a range of users. The views expressed in this submission are mine and not that of Headway Systems Ltd.
- 1.4 I am a professional Trustee of a several Trusts who own property within the Hawke's Bay region across a range of property types. The views expressed in this submission are mine and not that of the individual Trusts or beneficiaries of those trusts.
- 1.5 I do not personally own any property within the Hawke's Bay region. I am a beneficiary of Trusts that does own property in the Hawke's Bay region.

2.0 Submission

- 2.1 I submit that the proposed changes to a Capital Value Rating system would be flawed particularly when the motivation outlined in the consultation agreement prepared by the Hawkes Bay Regional Council is to provide improved "equity", "stability" and "fairness" of the rates burden to property owners across the region.
- 2.2 The Hawke's Bay Regional Council (HBRC) proposal to move to a Capital Value rating is predicated on the assessed Rating Values, which form the basis of the rating calculation, also being "equitable", "stable" and "fair". I submit that this is not the case and that the assessed rateable values for individual properties is far from "fair" and "equitable". While they may show a degree of stability at a high level they lag the market trends (positive and negative) particularly when specific sectors are being considered. The lag and variation therefore contributes to imbalance at any given time. To adopt a Capital value rating assessment would further exaggerate the already existing disparity.

- 2.3 The calculation of the rates is under the Local Government (Rating) Act 2002 which relies solely on the Rating Valuations Act 1998. The Ratings Valuation Act 1998 (RVA) is an act, when combined with the Ratings Revaluation Handbook (RRV) 31 March 2001, is not fit for purpose nor provides "equity", "stability" nor "fairness" in its current form or the current implementation to derive those value assessments for individual property owners.
- 2.4 The above statement is explained further;
- 2.5 Land Information New Zealand (LINZ) the Government Agency empowered to administer and audit the assessment of rating values, through the Valuer General's office (VG), has identified that the current mechanism to assess rating values and the ability of Valuation Services Providers (VSP) to provide a robust outcome of value is inadequate and at the point of failure. (Rating Valuations Regulatory System Assessment Summary, Appendix I).
- 2.6 The key points from this review are summarised as follows;
- 2.7 At para 27 it states that the Ratings Valuation regulatory system delivers certified general revaluations and that since the RVA came into force in July 1998 they have all been certified by the VG. It fails to acknowledge that the time to obtain certification (sign off the assessments) is becoming increasingly protracted across many TA's due to VSP's inability to provide the expertise and skill to complete the assessments. This though is confirmed in the response from LINZ (Rating Valuations Regulatory System Assessment – Toitu Te Whenua Land Information New Zealand Response – Appendix II). *"I accept the key issue identified in the Rating Valuations system assessment, that the system and its participants are not reliably producing revaluations that meet the required standard the first time they are submitted..."*
- 2.8 Para 28 states "The objection process appears to be working well..." and that "the LVT (Land Valuation Tribunal) receives very few requests each year to review TA objections decisions...". This may be the case though is not a result of a functioning system but in fact that the ability to challenge and appeal assessments has major barriers in place for the general public. The main barrier being the lack of affordability from objectors and that to enter the debate around value the cost or time cannot be justified. In many cases apathy and lack of understanding of property owners is also a major contributor behind the reason Objections are not pursued further. From personal experience there is also a level of arrogance and dismissal from VSP's when considering objections and the response to them. The objector must provide all the reasons why they wish to object and the supporting data to support their view. The VSP's simply provide a letter back after considering the objection with the outcome of their decision. No supporting information, data or reasoning of any kind is provided. When questioned around the lack of reasoning the responses are often along the lines of "if you don't like it take it to the LVT." Yet the Rating Revaluations Handbook clearly notes and recommends that valuers when assessing Rating Values comply with the Property Institute of New Zealand (PINZ) standards. The PINZ standards are heavily linked to the overarching International Valuation Standards (IVS). These standards clearly note that clear explanation and supporting evidence must be provided to show the reader how the value was assessed. Moving to a Capital Value rating will create more queries and dissatisfaction from land owners likely to create increased objections and challenges resulting in increased time and cost to the TA's and VSP's.
- 2.9 Frequently you also face push back, from VSP's, at initial discussion phase. The VSP's appear to be too concerned and focused on the impact on the specific property subject to objection and whether the challenge around value still meets the "Statistical Analysis" (Section 37 of the

Rating Valuations Handbook). The message being conveyed is that irrespective of the evidence that may support the objection. If it creates an outcome that then falls out of the Statistical Analysis parameters, they either reject the objection or adjust to still fit within the set parameters. This stance therefore is not assessing "fair" or "equitable" values.

- 2.10 The key points of the review that are relevant to my objection of adopting a Capital Value assessment are summarised in paragraphs 29 – 40 of the Rating Valuations Regulatory System Assessment Summary (Appendix I). In short they cover areas such as "performance issues" and the inability to meet revaluations on the first attempt, failings of the VSP and system, the situation worsening and that valuations are becoming more complex.
- 2.11 The review also notes at paragraphs 48-50 the lack of skill and expertise held within the VSP's. If the desire is to move away from a Land Value rating system to a more complicated and to an assessment requiring a higher skill level such as Capital Value rating system this lack of skill and depth of knowledge will be further exposed. Much of the groundwork for rating assessments is undertaken by unregistered valuers (again in breach of the IVS and PINZ Standards) with the registered valuers only reviewing the work mostly "flying" in to review and sign off. I am often requested to meet and provide market overviews and information as to sales and market dynamics to VSP's to assist them reach conclusions. While I do not wish to see anyone fail the reaching out to others to help VSP's satisfy their internal requirements and audit processes is now at the point of the "goodwill" being exhausted and abused. This is also raised in the response from LINZ Rating Review Page 4 Item 2.0 – Improve rating valuation capability and capacity, that VSP's ability to recruit and retain staff is low.
- 2.12 The RVA through the valuation rules (RRV) tries to accommodate this by "dumbing down" the valuation approaches to be adopted and is explained in the Valuation Rules and amendments. Based on "averaging" and "indexing" of value assessments. It also has a lot of "smoothing" rules and guidance to assist an under resourced VSP. These rules impact value and can create distorted values for specific properties. While I appreciate it is a "mass appraisal" it creates inaccuracies at the individual property levels. This is particularly so in regions such as the HBRC authority area. As the high level of horticulture and intensive land uses and adopting adjusted or manipulated scenarios for land types, fruit types for specific varieties would be grossly erroneous creating large distortions between actual value verse mass appraisal values. It also occurs in industrial and commercial sectors where assumptions around leases are adopted.
- 2.13 Other areas where simplicity and uniformity are promoted irrespective of the actual circumstances that exist can also be found in the following areas;
- Irrigation water availability and over allocation. Does HBRC have overallocated water zones? If so under the RRV a large portion of the Heretaunga Plains within overallocated water zones are wrongly assessed.
 - Resource Consent terms conditions and added value to the specific property. What is the impact of 5 year Resource Consent reviews on horticulture and arable property.
 - Land Use consents specific to key properties.
 - Wind machines are deemed plant and equipment and excluded. Yet without them the crop type being grown would have a higher risk profile and a lower value to the plantings on the property. This would over value these assets under the proposed Capital Value rating.
 - Licenses and grower agreements. These are included currently in the Capital Value rating on the basis that all licenses and grower agreements are similar instruments. They are not and the inclusion, in my view is incorrect, and even contradicts areas in the RRV's where property with occupation licenses are treated differently.

- 2.14 The RVA and the valuations rules excludes woodlots and trees currently from some Rating Values yet under a Capital Value assessment would include all pip fruit, stone fruit and vines (other fruit crops) but exclude forestry whether commercial or for ETS purposes. In the HBRC this would be viewed as extremely unequitable and lacking fairness to many. If the HBRC are genuinely seeking "equity" and "fairness" then the current RVA and valuation rules does not provide that and is not fit for purpose to do so.
- 2.15 Changes in land use or way people live are also changing and likely to change as much of the populace seek more affordable accommodation. E.g. tiny homes may require a Resource Consent to install a wastewater treatment system and nothing more. Or residents are placing "relocatable" structures on existing property, many residential sections adjacent to exiting dwellings. The TA's are likely to be total oblivious to this trend. Both these scenarios are real and the occupiers have the potential to use all services of the region yet will have a low Capital Value relative to a permanent dwelling. This will create anomalies in the proposed move from Land Value rating to Capital Value rating. It will also place rated burden on some to the benefit of others likely to create angst within residents.
- 2.16 The National Property Database (NPD) is the key information base that forms the basis of the Rating Value assessments. This database was devolved in 1998/1999 and has not been updated since. Where property undertakes changes that requires consents (building, land use or water) then the TA notifies the VSP of these and they may have been added to the NPD records. As a representation of the properties held on file this would be a very low level and be for more recent property. Therefore, the assessments of a very high percentage of property across New Zealand are based on a point in time in 1999. Properties can change significantly without triggering consents to be sought. The assessment of the Capital Value does not now nor will it into the future capture these changes.
- 2.17 Compounding errors in the assessments. If a property was incorrectly described or value assessed at the time of the NPD devolution then there has likely been compounding errors since this time on that specific property. These impacts could be positive or negative as to the Land Value and Capital Value assessment. This then flows to how the Rates are assessed on that property. Property owners assume that their records held by TA's are accurate and complete. They also assume that the basis of the Rating Valuation is off accurate information held. Many TA's are trying to provide transparency to "property files" to assist the public. Yet the public has limited desire to check the information and only tends to occur when a transaction of a property is being considered. While it may be checked it does not mean it is corrected. Those that do check the information will often only suggest corrections if it is in their best interests. Cyclone Gabrielle may have altered this view to a portion of the public where TA's records are critical.
- 2.18 The integrity of the data is also highlighted in the LINZ response (Page 4 Item 1 – Supporting a well-functioning market for rating valuation services). This though is focused on the reduction of barriers for new VSP's to enter the market to provide services but is highlighting and responding to the point raised in the review that data integrity is deteriorating.
- 2.19 The Mass Appraisal of values is never going to be perfect and Regression Analysis is the tool of choice for bulk data assessments. Under this approach the objective is to have the full data set within an acceptable margin of error (Statistical Analysis in the RVA -Section 37). This purely by implication suggests that the variation within that data set could and often is quite diverse. This therefore means that the impact on individual properties can be quite extreme while still obtaining the margin of error threshold being sought by the VSP and the VG for the total review. The Capital Value model would further create distortion. If the distortion is smoothed then it means the data has been manipulated to create a better visual for the audit. This is based on the comments above that if VSP's do not have

the resource, skills and time to undertake a high level then the likelihood of achieving higher accuracy without adjustments is flawed.

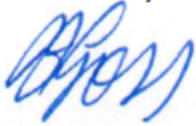
- 2.20 LINZ have raised at Local Government Association seminars, over the last few years, of their desire to take back control of the NPD and remove the control that VSP's have around data management, upkeep and dissemination. LINZ suggest this is to improve opportunity for other VSP's to enter the market and obtain full data sets. It is also to assist Government Agencies who also rely heavily on portions of this data to have an accurate base. This project is part of the political budget cycle and appears to be a low priority for funding and progression. This move also supports the concern that exists around the quality and accuracy of the base property data to which the land and capital values are assessed. HBRC or any TA using Capital Value rating is therefore at risk of relying on an incorrect base to assess the values.
- 2.21 VSP conflicts and contradiction. All VSP providers currently active in the assessment of Rating Values are also trying to provide private valuation advice and services to members of the public. The same valuers are undertaking both roles. While undertakings are given that information is not shared this is fundamentally flawed as a valuer who holds knowledge from any source must consider that in undertaking market assessments or disclose they have excluded information for a specific reason. If VSP's are doing what they are saying they are then, again they are in breach of the IVS and PINZ standards when acting as valuers. If VSP's wish to be both Rating Valuers and Public Valuers operating in the same market it would be easier and of lower risk of conflicts if they were simply assessing Land Value and not assessing Capital Values for Rating.
- 2.22 The VG (in the LINZ response to the Rating Review) has indicated that they are pushing more responsibility back to TA's to ensure data integrity is improved and informing TA's of when VSP's assessments are able to be certified or not. This is placing more pressure, cost and resource on the TA's. A move to Capital Value rating would require significant work to provide accurate property data for the HBRC region. While this is not solely HBRC's responsibility being shared with Hastings District, Wairoa District, Napier City and Central Hawkes Bay District it creates further burden on councils and inevitably the rate payer.
- 2.23 The public still place much reliance on the Rating Values and are of the view that it reflects Market Value and has relevance to market sentiment. Several TA's are trying to dispel this myth by stating it does not represent market value and is for rating purposes only. Many do not say anything. The assumption that the Rating Value at the Effective Date also represents Market Value on that date is flawed and misleading to the public particularly when considering the various rules and exceptions to be considered under the RVA and valuation rules issued by LINZ as alluded to earlier.
- 2.24 Based on the above the move to a Capital Value rating assessment will further highlight and place stress on an already fragile and failing process. This will result in more errors of assessment which will result in increased challenges and increased costs to the TA's.
- 2.25 While I am of the view the whole Rating system is a very blunt unsophisticated tool that is flawed at many levels, I am also conscious that TA's need something to use until another method of Rating is developed. While the RVA and its implementation with Rating Revaluation rules is not ideal nor perfect the current Land Value rating basis works to a level. I also suggest that as geospatial and LIDAR information improves the ability to have highly accurate land reports is available and likely to improve considerably. This would allow the assessment of the land portion of a property to become easier, with less physical inspection required and the ability to increase frequency. This would be of more benefit to all TA's. It also removes the current imbalance where under a Capital Value model a property not

developed, at the owner's choice, to its fullest potential has a lower rate burden than one that is fully developed.

- 2.26 A Land Value rating system based on the permissible uses, whether carried out or not, would remove this distortion and possibly assist in promoting increased development to benefit the region. As landowners not optimising the land would be incentivised to do so from an investment perspective otherwise the assessed Rates would become a burden for the underutilisation of the property. The Land Value would aid a more robust assessment and remove some of the complexities of assessing a Capital Value together with removing all the variations, adjustments and subjectiveness that sits in the current framework.
- 2.27 I would also suggest the assessment of Capital Values, as per current practice also cease as a Capital Value and Value of Improvement component in any Rating Assessment is not required and creates more ambiguity and angst to the public. This removes the risk or inequity and the "Disadvantages" highlighted in the HBRC consultation document. It would also assist in cost control for TA's. Simply why are they needed?
- 2.28 I fully understand that all TA's have increasing budgetary pressures. It appears many TA's use the move to Capital Value rating as an optic to the public that creates the opportunity to gather increased rates. I am of the view that the reasons given around increasing "fairness", "equity" and "stability" is purely marketing hyperbole to an ill-informed public. I am of the view that the same can be achieved with a Land Value rating assessment, in isolation. It does not prevent TA's increasing Rates and assisting in there budgetary challenges as this can be achieved by having larger rating factors, increased rating differentials and targeted rating where necessary all off a Land Value based rating.
- 2.29 I therefore submit that a move to Capital Value rating would not achieve the objectives stated in the HBRC consultation document and oppose the proposal.

Thank you for the opportunity to offer this submission. If you wish to question me on this submission I would be willing to attend the Council review.

Yours faithfully



Boyd A Gross

B Agr (Rural Val), Dip Bus Std, FNZIV, FPINZ

Report attached to the submission for review

https://www.linz.govt.nz/sites/default/files/corp/rating_valuations_regulatory_system_assessment_summary.pdf

Submitter ID: 501

Hearing? No

Fiona Ferris

Constituency: Heretaunga-Hastings

Type of property/ies: Lifestyle

1. Do you support the proposed move from LV to CV for the general rate? **No**

Because it will mean a 54% rates increase on our property alone, and over 100% increase in rates for our neighbours next door and an average of 56% for our street and neighbouring streets (Strome Road, Breckenridge Lane). I don't know of any neighbours who earn income from their properties, we certainly don't, it's just where we live. It is not equitable, fair or moral to increase rates for no reason other than because you can. Our street was badly flooded in the cyclone and our two closest neighbours lost their homes entirely. Personally we had to pay tens of thousands of dollars out of pocket to reinstate fencing and fix a slumped retaining wall that were not covered by our insurance. And our whole street had to pay in

for our private water system. Please don't add to our burden more by changing the way our rates are charged. Thank you for listening.

2. Do you support the regional economic development rate proposal? **Don't know**
3. Do you support the flood protection and drainage schemes proposal? **Don't know**
4. Do you support the passenger transport rate proposal? **Don't know**
5. Do you support the freshwater science charges and new targeted rate proposal? **Don't know**
6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Don't know**
7. Do you support the additional policies for rates remission and postponement? **Don't know**
8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 502

Hearing? Yes

Elma Raw

Constituency: Ahuriri-Napier

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? **No**

As a pensioner on a fixed income with very little cash reserve, I am not happy to see my rates changed to a capital value costing. I purchased my home three and a half years ago and have invested in updating it for my comfort. This will have improved the selling value and it will increase my rates accordingly. People who look after their properties shouldn't be penalized for spending their own money and looking after a property. As we pay rates on land value already for our properties both with the Regional Council and Napier City Council we are already paying twice.! Basing our rates on the capital value will result in price increases with both councils This is unfair.! Capital values are dictated by the property market .which consistently alters. In our adjoining flats, there is a very big difference in the capital values of all four properties. How can rates be equal when we share the same landblock but are charged on different prices?

2. Do you support the regional economic development rate proposal? **No**

Every NZ is facing increased living costs daily and with severe climatic issues, all insurance and basic living expenses have increased. Our incomes haven't, and for pensioners never will. Please don't make it harder for all of us to live daily

3. Do you support the flood protection and drainage schemes proposal? **Yes**

Preventative and long-term measure are desperately needed to protect our homes and families but also our

4. Do you support the passenger transport rate proposal? -

5. Do you support the freshwater science charges and new targeted rate proposal? -

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

7. Do you support the additional policies for rates remission and postponement? **Yes**

Councils are here to run our cities effectively and to provide our people with properly managed resources. While money has to be found from the people for this, sometimes major changes need to be implemented to meet a current crisis situation. Councils must be flexible if required.

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 503

Hearing? No

Brian Slader

Constituency: Heretaunga-Hastings

Type of property/ies: Rural

1. Do you support the proposed move from LV to CV for the general rate? **No**

The economic base of HB is derived from the land not the improvements on the land. The LV rating system means that we all get the same services. Under the CV proposal means I pay more for services than my

Neighbour because my house might have a higher value. The land provides the income not the house. To say that because my houses has a higher value than my neighbors means that I have a greater ability to pay more in rates has no basis at all and is something totally dreamed up at your end. You state that having a higher CV means you can derive more income from our improvements. Please give me an example of how this is possible. Are we meant to rent our home out and live in a tent. People on a pension would find this totally unfair.

2. Do you support the regional economic development rate proposal? **Don't know**

3. Do you support the flood protection and drainage schemes proposal? **Yes**

4. Do you support the passenger transport rate proposal? **No**

This should not be regional council business. Focus of what you were established for. Flood control and pest control. Both of which you have failed miserably at. History will attest to that.

5. Do you support the freshwater science charges and new targeted rate proposal? **Yes**

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Don't know**

7. Do you support the additional policies for rates remission and postponement? **Yes**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? As an organisation you have lost you way. You have become woke at the detriment to the community that you are meant to serve. The February cyclone, whist extreme showed that you have learnt nothing from previous events. In my area, Haumoana the same mistakes are made very time. Houses were flooded do to your incompetence. Your staff seem happy to drive around in their utes but never get out of them and fix what is needed. Time to re-focus on your core business.

Submitter ID: 504

Hearing? No

lesley pore

Constituency: Heretaunga-Hastings

Type of property/ies: Rural

1. Do you support the proposed move from LV to CV for the general rate? **No**

Why should i pay a tax on an asset on my land that i have worked hard to achieve.

2. Do you support the regional economic development rate proposal? **No**

3. Do you support the flood protection and drainage schemes proposal? **No**

4. Do you support the passenger transport rate proposal? **No**

5. Do you support the freshwater science charges and new targeted rate proposal? **No**

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **No**

7. Do you support the additional policies for rates remission and postponement? **No**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 505

Hearing? No

Yoka Knox

Constituency: Heretaunga-Hastings

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? **No**

Because I don't trust that you will do this in a fair manner and those whom look after their property get punished for it.

2. Do you support the regional economic development rate proposal? **Don't know**

I need to understand this better. Your explanation wasn't sufficient.

3. Do you support the flood protection and drainage schemes proposal? **Don't know**

I need to understand this better. Your explanation wasn't sufficient.

4. Do you support the passenger transport rate proposal? **Don't know**

5. Do you support the freshwater science charges and new targeted rate proposal? **Don't know**

Real fresh water? Or are you going to continue poisoning us with your chlorine and fluoride. You know fine well that the science says these are toxic to the body and fluoride has even been through court and Bloomfield lost. You legally can no longer add fluoride to water for consumption.

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Don't know**

I need to understand this better. Your explanation wasn't sufficient.

7. Do you support the additional policies for rates remission and postponement? **Don't know**

I need to understand this better. Your explanation wasn't sufficient.

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?

Yes. I expect a significant discount for those of us who provide our own water supply and deal with our own waste. I cannot see this anywhere in your proposal. Please explain why this is not in your proposal.

Submitter ID: 506

Hearing? No

Dave Kruger

Constituency: Heretaunga-Hastings

Type of property/ies: Lifestyle

1. Do you support the proposed move from LV to CV for the general rate? **No**

The argument that capital improvements on a lifestyle property (residential house) somehow confers an ability to earn revenue is absurd. I extend an invitation to any regional councillor to assess our property and demonstrate how this additional income is meant to be generated. Furthermore many of the properties in our immediate area were devastated or completely destroyed by cyclone Gabrielle. To saddle these residents with what amounts to little more than a "wealth tax" seems unreasonable.

2. Do you support the regional economic development rate proposal? -

3. Do you support the flood protection and drainage schemes proposal? -

4. Do you support the passenger transport rate proposal? -

5. Do you support the freshwater science charges and new targeted rate proposal? -

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

7. Do you support the additional policies for rates remission and postponement? -

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 507

Hearing? No

Gerard Pain

Constituency: Tamatea-Central Hawke's Bay

Type of property/ies: Rural

1. Do you support the proposed move from LV to CV for the general rate? **No**

HBRC deals with land irrespective of what is on it. It is irrelevant what other regional councils do. We are all struggling to afford rates now without you jacking them up further.

2. Do you support the regional economic development rate proposal? **Don't know**

I am too technologically challenged to find out what you are proposing whilst making a submission

3. Do you support the flood protection and drainage schemes proposal? **Don't know**

See above

4. Do you support the passenger transport rate proposal? **Don't know**

See above

5. Do you support the freshwater science charges and new targeted rate proposal? -

See above

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Don't know**

See above

7. Do you support the additional policies for rates remission and postponement? **Don't know**

See above

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? **No**

Submitter ID: 508

Hearing? No

Damien Naidoo

Constituency: Wairoa

Type of property/ies:

1. Do you support the proposed move from LV to CV for the general rate? **No**

Regional council serves to shoot itself in the foot with a move from land value (LV) to capital value (CV) for the general rate. LV rates/taxes are logical as they capture the value created by society: community activity, infrastructure and favourable environmental conditions lead to more desirable places and correspondingly increasing land value. These value increases can be considered common-wealth, and thus ideologically, make sense to rate on (tax). Not just the HBRC, but all levels of government in NZ should consider this. Indeed, if one looks back historically, considerable portions of all government income in NZ once came from LV taxation. Rating on CV serves to fuel a fire of discontent, that is: "I'm getting punished for what I've created or invested in." Rating on LV the council can argue: we're collecting our rates from what society produces: the value of the land! The council - apparatus of the community - is merely taxing/rating on the value that belongs to the community in the first place. Shift an entire community out of an area leaving it inhabited: what would the land value become? Capital value, prior to abandoned building deterioration, would remain the same even in a ghost town. Tellingly this CV is not the right one for our community representatives (councils) to tax us on! Rating on CV is logically a clear disincentive for landholders to improve their property. Any governing body in NZ concerned with the environment should do what it can to encourage densification of existing urban areas: medium density and high density where appropriate as opposed to low density housing; the product of which is urban sprawl. Urban sprawl consumes important farmland and places strain on civic infrastructure... HBRC shoots itself in the foot with its shift to CV because in time all levels of Government will have to switch to LV taxation for a fairer and more balanced rating system, reforms which will have to take place in conjunction and in time with broader taxation reforms. An exclusive shift to CV for the general rate takes HBRC further away from this. Balance, fairness and land use leverage can be achieved using differentials. Fewer fixed charges and as much as possible of the rating pie being collected via the general rate are encouraged by progressive taxation think tanks. An excellent Local Government (LG) rates primer that is in an Australian context, but as relevant in NZ as it is in Aus is Prosper Australia's LG rates primer: <https://www.prosper.org.au/primers/local-government-rates-primer>. Closer to home, Common Ground Aotearoa (<https://www.common-ground.org.nz/>) argue for LV along similar lines.

2. Do you support the regional economic development rate proposal? **Don't know**

3. Do you support the flood protection and drainage schemes proposal? **Don't know**

4. Do you support the passenger transport rate proposal? **Don't know**

5. Do you support the freshwater science charges and new targeted rate proposal? **Don't know**

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Don't know**

7. Do you support the additional policies for rates remission and postponement? **Don't know**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?

Perhaps HBRC should claim considerably more, via an LV rated differential on the general rate from plantation forestry due to its considerable impact on our environment - not to mention strain on infrastructure. Farmers can then be given some relief via an appropriate differential without a move to CV and the corresponding punishment for low income urban households...

Scott Lawson on behalf of Hawke's Bay Vegetable Growers Association

Constituency: Heretaunga-Hastings

Type of property/ies: Rural

1. Do you support the proposed move from LV to CV for the general rate? **No**

Further Consultation Required

2. Do you support the regional economic development rate proposal? **No**

Further Consultation required

3. Do you support the flood protection and drainage schemes proposal? **No**

Further Consultation required

4. Do you support the passenger transport rate proposal? **No**

Further Consultation required

5. Do you support the freshwater science charges and new targeted rate proposal? **No**

Further Consultation required

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **No**

Further Consultation required

7. Do you support the additional policies for rates remission and postponement? **Don't know**

Further Consultation required

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?

There has been no direct consultation to date with this organisation representing growers affected by the changes.

Helen Crawford

Constituency: Heretaunga-Hastings

Type of property/ies: Rural Lifestyle

1. Do you support the proposed move from LV to CV for the general rate? **No**

This disproportionately increases our rates compared with others. Please think very carefully before increasing rates that may considerably increase cyclone affected properties. Using Capital Value you are basing this on the Capital Value before the cyclone. Our property is of completely unknown value as of this yr. Half our fields were under 10m of water I am not sure anyone would pay the current CV for our property. Additionally our bills to get our land back to what it was go on and on. The weekends of labour that are endless, January annual leave this yr (2024) used to be for holidays, now is used for cyclone clean up. We missed opportunities to have clean up cost covered due to lack of access due to the mud. The weeds are out of control from the silt, we have high chemicals and equipment costs but more importantly time. Please consider the cyclone when making these changes. Please find attached a photo of our fields, now of questionable market value. Where there was mud, there are now weeds taller than most humans. Insurance doesn't cover weed control, or picking up rubbish, or removing silt. We had to self purchase a digger, a spray machine with a quad bike and a mower/mulcher to get this even close to what it was. Please don't disproportionately hit those whose land was annihilated, please consider, if this doesn't increase your revenue, maybe 2024 isn't the yr?



2. Do you support the regional economic development rate proposal? **Don't know**
3. Do you support the flood protection and drainage schemes proposal? **Don't know**
4. Do you support the passenger transport rate proposal? **Don't know**
5. Do you support the freshwater science charges and new targeted rate proposal? **Don't know**
6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Don't know**
7. Do you support the additional policies for rates remission and postponement? **Don't know**
8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 511

Hearing? No

Tom Collier

Constituency: Tamatea-Central Hawke's Bay

Type of property/ies: Rural

1. Do you support the proposed move from LV to CV for the general rate? **Yes**
2. Do you support the regional economic development rate proposal? **Yes**
3. Do you support the flood protection and drainage schemes proposal? **Yes**
4. Do you support the passenger transport rate proposal? **No**
5. Do you support the freshwater science charges and new targeted rate proposal? **Yes**
6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Yes**
7. Do you support the additional policies for rates remission and postponement? **Don't know**
8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 512

Hearing? No

Larry Dallimore

Constituency: Ngaruroro

Type of property/ies: Lifestyle

1. Do you support the proposed move from LV to CV for the general rate? **No**

The proposed rate increases are not fair, equitable and cannot be justified.

2. Do you support the regional economic development rate proposal? **No**

HBRC care and services to environment issues are excellent but we do not support the Councils over dependence on endless consultant reports, new services that require endless staff and the lack of installed solutions for HB coastal erosion - first recorded in 1960 (southern) and 1976 (northern). It appears the HBRC expanded services and failure to control expenditure now requires extraordinary increases to Property Rates which exceed inflation.

3. Do you support the flood protection and drainage schemes proposal? **No**

With elevated location (other than road access and proximity to poorly maintained riverbeds and catchments) our property does not require 'flood protection or drainage schemes'.

4. Do you support the passenger transport rate proposal? **No**

Our rural location ensures we cannot be dependent on HBRC's subsidised 'passenger transport' services. I understand public transport is viable when passengers are provided regular services within reasonably close proximity. The number of buses and the service frequency required by too few is why private enterprise is not interested. HBRC could address genuine needs with a well-controlled shuttle service.

5. Do you support the freshwater science charges and new targeted rate proposal? **Yes**

Attention to this science is important and a necessity.

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

Yes & No. HBRC should control forest harvesting practices, the discarded logs and branches during processing that enters streams, rivers and eventually the coast. HBRC should ensure any extreme flooding event does not allow this material to dam and collapse perfectly sound bridges which have and should continue to withstand any extreme volumes of silt and water. The 9% pine content that collapsed many HB

bridges was a fabricated estimate. The risks and difficulty to make any accurate measured assessment (within 1%) at each location was almost impossible. This figure amused colleagues involved in the industry.

7. Do you support the additional policies for rates remission and postponement? **Don't know**

We understood such needs and assistance are provided by Govt Depts.

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?

Could you please provide answers, detail or explanation to the issues raised in the attached Submission document. I would have liked to present my Submission but after my last 61 page detailed Submission to HBRC was virtually given a one sentence meaningful response that "our views are disparate", it would be a wasted effort.

Attachment for Submission to the HB Regional Council

Could the Council provide explanation or detail to support the following comments made by the HBRC Chair and or HBRC staff?



Responsible councils review how they set rates. It is important to do this to make sure rates are being set in the right way. Part of doing that is to look at all the rates levied for all the activities of a council and work out who benefits, who contributes to the need for the activity, the type of rate (general or targeted), percentage splits, rating footprint, and rating differentials.

cost and service changes. This council's guiding principles for the rates review have been to be clear and fair, simple and flexible.

Capital value is seen to be more equitable, fairer and stable because those with more capital have more productive earning capacity, consume more resources and capital values fluctuate less than land value.

Councils work hard to get to a best fit for categories of property, even though this will in most cases leave some properties with solutions that owners will see as unfair.

"CV can be considered to be more equitable than LV because it considers the value of, the capacity to earn from, both the land and the improvements on the land [such as buildings]," a consultation document read.

Valuation Roll No.	Property Address	2023/24 Rate Invoiced	Proposed New HBRC Rates	Proposed Increase	% Rates Increase
09579-07902	16 Breckenridge Road	\$745.58	\$1,162.44	\$416.86	56%
09579-07730	147 Breckenridge Road	\$410.33	\$654.97	\$244.64	60%
09579-07729	164 Breckenridge Road	\$475.85	\$680.07	\$204.22	43%
09579-07723	184A Breckenridge Road	\$448.97	\$691.27	\$242.30	54%
09579-07717	191 Breckenridge Road	\$515.38	\$1,016.51	\$501.13	97%
09579-07718	199 Breckenridge Road	\$481.90	\$695.01	\$213.11	44%
09579-07721	204 Breckenridge Road	\$488.47	\$981.25	\$492.78	101%
09579-07722	206 Breckenridge Road	\$476.79	\$824.44	\$347.65	73%
09579-07705	207 Breckenridge Road	\$440.34	\$653.11	\$212.77	48%
09579-07724	208 Breckenridge Road	\$458.45	\$692.94	\$234.49	51%
09579-07719	209 Breckenridge Road	\$437.54	\$626.14	\$188.60	43%
Total Annual Rate Increase		\$5,379.60	\$8,678.15	\$3,298.55	61%

Wayne Taylor

Constituency: Māui Ki Te Raki (Māori Constituency)

Type of property/ies: Residential Rural

1. Do you support the proposed move from LV to CV for the general rate? No

Moeangiangi PT 42N Block XI Survey District Maori Reserve. Mohaka A17 E2 and E! Waihua A22. Mangatu Incorporation v Valuer-General - [1996] 2 NZLR 683, This was a court case that decided that Maori Land should be valued less than Pakeha Land. The court case decision was made in 1996 and today is 2024. The decision was made 28 years ago. There has been no definitive decision made by the Valuer General or Court of Appeal to finalise the decision in 1996. The valuer General has made a guidance on the valuation of Maori Land. I submit that all Maori land in the HBRC should have its rates set at 95 % lower than Pakeha land, The reason being is Maori land as per Mangatu decision and that this current NZ government of 2024 is banning the Treaty Of Waitangi. This will also lead to the Maori Land Rates remission under the rating powers act being struck out of the act. This will lead to Councils being able to sell Maori land and sold to pakeha or foreigners. Maori will be kicked off their land and any dwellings will be bulldozed and any occupiers will be jailed. Maori will be dispossessed of all land, as well as rights to fish, hunt and gather kai. To save jail space all Maori will be deported overseas to Gaza, Ukraine, South Sudan. We will all have to fight wars in foreign lands for the maori race to survive,

2. Do you support the regional economic development rate proposal? No

Moeangiangi PT 42N Block XI Survey District Maori Reserve. Mohaka A17 E2 and E! Waihua A22. Mangatu Incorporation v Valuer-General - [1996] 2 NZLR 683, This was a court case that decided that Maori Land should be valued less than Pakeha Land. The court case decision was made in 1996 and today is 2024. The decision was made 28 years ago. There has been no definitive decision made by the Valuer General or Court of Appeal to finalise the decision in 1996. The valuer General has made a guidance on the valuation of Maori Land. I submit that all Maori land in the HBRC should have its rates set at 95 % lower than Pakeha land, The reason being is Maori land as per Mangatu decision and that this current NZ government of 2024 is banning the Treaty Of Waitangi. This will also lead to the Maori Land Rates remission under the rating powers act being struck out of the act. This will lead to Councils being able to sell Maori land and sold to pakeha or foreigners. Maori will be kicked off their land and any dwellings will be bulldozed and any occupiers will be jailed. Maori will be dispossessed of all land, as well as rights to fish, hunt and gather kai. To save jail space all Maori will be deported overseas to Gaza, Ukraine, South Sudan. We will all have to fight wars in foreign lands for the maori race to survive,

3. Do you support the flood protection and drainage schemes proposal? -

Moeangiangi PT 42N Block XI Survey District Maori Reserve. Mohaka A17 E2 and E! Waihua A22. Mangatu Incorporation v Valuer-General - [1996] 2 NZLR 683, This was a court case that decided that Maori Land should be valued less than Pakeha Land. The court case decision was made in 1996 and today is 2024. The decision was made 28 years ago. There has been no definitive decision made by the Valuer General or Court of Appeal to finalise the decision in 1996. The valuer General has made a guidance on the valuation of Maori Land. I submit that all Maori land in the HBRC should have its rates set at 95 % lower than Pakeha land, The reason being is Maori land as per Mangatu decision and that this current NZ government of 2024 is banning the Treaty Of Waitangi. This will also lead to the Maori Land Rates remission under the rating powers act being struck out of the act. This will lead to Councils being able to sell Maori land and sold to pakeha or foreigners. Maori will be kicked off their land and any dwellings will be bulldozed and any occupiers will be jailed. Maori will be dispossessed of all land, as well as rights to fish, hunt and gather kai. To save jail space all Maori will be deported overseas to Gaza, Ukraine, South Sudan. We will all have to fight wars in foreign lands for the maori race to survive,

4. Do you support the passenger transport rate proposal? No

NO Maori do not have public transportation.

5. Do you support the freshwater science charges and new targeted rate proposal? -

No maori never polluted the water, apart from the Wairoa Waikaremoana Maori Trust Board allowing the release of water from Lake Waikaremoana during Cyclone Gabrielle leading to the destruction of the area.

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **No**

No Maori cannot afford it

7. Do you support the additional policies for rates remission and postponement? -

Yes but the current government of 2024 will make any rates remission on Maori land illegal. The MPs for Napier, Gisborne and the Maori seat are all National and are racist

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? It is crap. Maori will have to pay money they do not have

Submitter ID: 514

Hearing? No

SIMON NASH

Constituency: Ahuriri-Napier

Type of property/ies: Lifestyle

1. Do you support the proposed move from LV to CV for the general rate? **No**

There is real inequity in this proposal. The argument hits at lifestyle owners who have land and residences but are not earning from their dwellings. It favours hort and agri and pastoral income landowners and of course, town residents. Lifestyle owners get little enough support from HBRC already for the rates they pay. As the proposal stands now, residents in the Breckenridge Road area, will be hit by an average 55% increase in rates - for no extra service. And this in the year after we have been smashed by Cyclone Gabrielle. While Council argues that the review is about redividing the pie to reapportion the rates burden, it falls excessively on those who merely live rurally. These are people least a burden in cost terms to the Council, yet they're going to be asked to stump up large increases to cover the cost needs of a large number of cost intensive residents in towns etc.. It's frankly a clear case of redistributive wealth management driven not by equity but by a 'hit the rich' mentality.

2. Do you support the regional economic development rate proposal? **No**

There is real inequity in this proposal. The argument hits at lifestyle owners who have land and residences but are not earning from their dwellings. It favours hort and agri and pastoral income landowners and of course, town residents. Lifestyle owners get little enough support from HBRC already for the rates they pay. As the proposal stands now, residents in the Breckenridge Road area, will be hit by an average 55% increase in rates - for no extra service. And this in the year after we have been smashed by Cyclone Gabrielle. While Council argues that the review is about redividing the pie to reapportion the rates burden, it falls excessively on those who merely live rurally. These are people least a burden in cost terms to the Council, yet they're going to be asked to stump up large increases to cover the cost needs of a large number of cost intensive residents in towns etc.. It's frankly a clear case of redistributive wealth management driven not by equity but by a 'hit the rich' mentality.

3. Do you support the flood protection and drainage schemes proposal? **Yes**

4. Do you support the passenger transport rate proposal? **Yes**

5. Do you support the freshwater science charges and new targeted rate proposal? **Yes**

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Yes**

7. Do you support the additional policies for rates remission and postponement? **Yes**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 515

Hearing? No

Caron Taana

Constituency: Ahuriri-Napier

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? **No**

This is a lazy effort to get more money from residential property owners. I already pay rates to the NCC using CV. I watched the video of the chair saying HBRC rates intake will be the same using CV, but this does not make sense why change if the income remains the same? It appears that rural landowners are getting off lightly here as are businesses and they can make tax claims on their properties

2. *Do you support the regional economic development rate proposal?* **No**

HBRC made a mess of the economic development of the dam and it cost everyone except the people pushing for it. Have they paid back the outstanding 400,000 yet? Do you intend to collect this overdue payment or are you expecting residents who were to get no benefit to cover those costs in your new economic development proposal. Work on things to make things better for residents. Fix our waterways.

3. *Do you support the flood protection and drainage schemes proposal?* **Don't know**

4. *Do you support the passenger transport rate proposal?* **Yes**

5. *Do you support the freshwater science charges and new targeted rate proposal?* **No**

Not clear what you are hoping to achieve

6. *Do you support the sustainable land management and biodiversity/biosecurity proposal?* **No**

Not sure how my property benefits. Is this for rural areas?

7. *Do you support the additional policies for rates remission and postponement?* **Yes**

8. *Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?*

Poor timing of consultation and scant information. Should not pay a cent for "economic development". Wasted well over \$20 million of public money on water storage for irrigation. That was just one failed project. Why, when you guys are for the "region", are the residential properties going to be paying more than the Regional or country Properties.

Submitter ID: 516

Hearing? No

Raewyn O'Connor

Constituency: Ahuriri-Napier

Type of property/ies: Residential

1. *Do you support the proposed move from LV to CV for the general rate?* **No**

Capital value is altered by building costs (which have risen hugely) and the market, whereas land value is more fixed in a given area. Because someone may build a house of higher materials value or design, does not mean it requires more of the HBRC in terms of services, and in fact if one builds a much more ecoefficient dwelling it is more expensive, but has less impact on the environment. It is imposing a higher ratio on those perceived by the HBRC as more able to pay, but for what extra services provided?

2. *Do you support the regional economic development rate proposal?* **Don't know**

3. *Do you support the flood protection and drainage schemes proposal?* **No**

It should be based on land value - agreed bare land does not suffer quite the same harm as improvement values in flooding, but occupiers/owners are already paying greatly increased insurance premiums for the cost of the improvements. Definitely need flood protection but make it equitable based on the value of the land as insurance premium increase to cover the damage to capital improvements is already very costly.

4. *Do you support the passenger transport rate proposal?* **No**

I have spent some time reviewing the Go Bus timetable and I can walk to work faster than this option allows, and it does not cater for those who work into the early evening. I do not mind paying a passenger transport rate if it was usable.

5. *Do you support the freshwater science charges and new targeted rate proposal?* **Yes**

6. *Do you support the sustainable land management and biodiversity/biosecurity proposal?* **No**

As a dweller on a small section in town, I don't see that I have much ability to influence sustainable land management practices of the rural sector. This seems to be spreading the cost to those who are seen as able to pay but can have no influence over those land management or biodiversity practices.

7. *Do you support the additional policies for rates remission and postponement?* **Don't know**

Presumably this has already been applied to all who were impacted by flooding in Cyclone Gabrielle and are unable to live on or farm the affected land?

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 517

Hearing? No

Anna Murphy

Constituency: Heretaunga-Hastings

Type of property/ies: Lifestyle

1. Do you support the proposed move from LV to CV for the general rate? **No**

The current Capital Value of our property does not take into account that we lost our home (improvement value) and our property was severely impacted in Cyclone Gabrielle, hence we do not believe this is a fair and equitable way of determining rates. Furthermore, the HBRC information states that properties with higher Capital Values have greater ability to generate revenue from those properties. We have no or very little ability to generate any income or revenue from our lifestyle property.

2. Do you support the regional economic development rate proposal? **No**

As above

3. Do you support the flood protection and drainage schemes proposal? **Yes**

Important issue.

4. Do you support the passenger transport rate proposal? **No**

We also have limited access to any public transport due to the locality of our property.

5. Do you support the freshwater science charges and new targeted rate proposal? **No**

As above

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **No**

As above

7. Do you support the additional policies for rates remission and postponement? **No**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? As above

Submitter ID: 518

Hearing? No

Sarah McIlroy

Constituency: Heretaunga-Hastings

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? **No**

That is a significant change that will affect the majority of property owners increasing rates. You are not encouraging development of houses, this will affect standard of living. You are punishing people for developing and bettering their living situation. You are favouring bare land, should we be encouraging the use of land considering we have a housing shortage?

2. Do you support the regional economic development rate proposal? **Yes**

3. Do you support the flood protection and drainage schemes proposal? **No**

It should be based of LV not CV. How developed your house is should not mean larger cost. The drainage, flood protection should be effective regardless, these are basic council services. This has not be prioritised in previous decades, ie drain, river, pump maintenance and this was found out during adverse weather. Having two different councils also is counter productive it doesn't seem clear each council knows what is their responsibility and therefore the maintenance has not be done.

4. Do you support the passenger transport rate proposal? **Don't know**

Public transport is pretty much non existent in clive so charges should not increase for this.

5. Do you support the freshwater science charges and new targeted rate proposal? **No**

Again something not prioritise by the councils for decades. Until the maintenance and work on our sewage system is done to prevent the pollution of our rivers and sea rate payers shouldn't see continued increase in costs as it's not being effectively spent. Sewage should never leak into our water ways

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

Should remain as is based on whether your rural or urban and property size. You choose to live there

7. Do you support the additional policies for rates remission and postponement? **Yes**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?

Both councils need to clearly outline and communicate who owns, maintains etc what. Funds need to be clearly prioritised and the wasteful spending needs to stop. The nice to haves ie parks playground etc can't come until the essentials are up to scratch. Need more logic to spending

Submitter ID: 519

Hearing? No

Mike Petersen

Constituency: Tamatea-Central Hawke's Bay

Type of property/ies: Rural

1. Do you support the proposed move from LV to CV for the general rate? **Yes**

This is a fairer way of rating for the region

2. Do you support the regional economic development rate proposal? **Yes**

3. Do you support the flood protection and drainage schemes proposal? **Yes**

4. Do you support the passenger transport rate proposal? **Yes**

5. Do you support the freshwater science charges and new targeted rate proposal? **No**

It is difficult to understand the changes and implications for individual consent holders, however the policy makes no reference to consent holders that are not able to take or discharge water due to legal or other impediments outside of the consent holders control. In setting fees and charges, Council has an obligation to ensure these are fair and reasonable. It is completely unreasonable and against public law principles for HBRC to charge any consent holder that is not having any effect on the environment, just because they hold a consent for an activity that may happen at a future stage. It is clear that a consent holder that is not able to implement it's consents for matters outside of its control is not having any effect on the environment, and the general monitoring of the resource is also of no additional value to that individual consent holder over and above an individual ratepayer. Once consents become operable, there are considerable obligations and requirements on the holder to report, and contribute to information and science gathering through rates and other charges. I would propose the addition of criteria for charges to ensure that any fees and charges are applied to consent holders that are operative and able to draw and discharge water.

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Yes**

7. Do you support the additional policies for rates remission and postponement? **Yes**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 520

Hearing? No

Dave Argent

Constituency: Heretaunga-Hastings

Type of property/ies: Lifestyle

1. Do you support the proposed move from LV to CV for the general rate? **No**

I do have concern regarding the reason given for moving to Capital Value. I have no earning capacity on my small block and am unsure who came up with this idea ? It is not more equitable, not fairer and I pay all costs associated with it. As far as consuming more resources, what on earth does that mean when I pay for any resource I use. I'd suggest that it is easier to increase my rates because it would appear I can pay for the increases and decrease rates elsewhere.....this isn't actually fair or equitable for me. I am unsure what I get

for my HDC rates as I receive no recycling or rubbish collection and pay all water/electricity costs.....so overall I pay a lot and don't get much back.....fancy that !

2. Do you support the regional economic development rate proposal? **Don't know**
3. Do you support the flood protection and drainage schemes proposal? **Yes**
4. Do you support the passenger transport rate proposal? **Don't know**
5. Do you support the freshwater science charges and new targeted rate proposal? **Don't know**
6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Don't know**
7. Do you support the additional policies for rates remission and postponement? -
8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 521

Hearing? No

Charmaine Gettins

Constituency: Heretaunga-Hastings

Type of property/ies: Rural

1. Do you support the proposed move from LV to CV for the general rate? **No**

It's an unfair system switching from Land to Capital. We as owners, drive and maintain our property at our own costs. Why does the Regional Council want to take advantage of owners developing their homes? You put no financial input into our housing. Happy to pay a rateable expenses on the land only

2. Do you support the regional economic development rate proposal? **No**

See above comments

3. Do you support the flood protection and drainage schemes proposal? **Don't know**

Wasn't that flood protection our biggest down fall issue with Gabrielle. Stopbanks bursting. Maybe maintenance schedules of clearing rivers didn't occur?

4. Do you support the passenger transport rate proposal? **No**

Personally not affected as we can't access transport being rural. As an example - health shuttles don't service rural areas. We find our own transportation at our own costs

5. Do you support the freshwater science charges and new targeted rate proposal? **Don't know**

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Don't know**

7. Do you support the additional policies for rates remission and postponement? **Yes**

Elderly need support financially on this matter

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 522

Hearing? No

Istvan Lengyel

Constituency: Tamatea-Central Hawke's Bay

Type of property/ies: Residential Rural Lifestyle

1. Do you support the proposed move from LV to CV for the general rate? **No**

Poor management of funds, lack of planning and budgeting over the years for maintenance and environmental changes. Councils have a responsibility to plan ahead, however it seems that most councils are unable to do this well.

2. Do you support the regional economic development rate proposal? **No**

3. Do you support the flood protection and drainage schemes proposal? **No**

4. Do you support the passenger transport rate proposal? **No**

Poor management of funds, lack of planning and budgeting over the years for maintenance and environmental changes. Councils have a responsibility to plan ahead, however it seems that most councils are unable to do this well

5. Do you support the freshwater science charges and new targeted rate proposal? **No**

Poor management of funds, lack of planning and budgeting over the years for maintenance and environmental changes. Councils have a responsibility to plan ahead, however it seems that most councils are unable to do this well

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **No**

Poor management of funds, lack of planning and budgeting over the years for maintenance and environmental changes. Councils have a responsibility to plan ahead, however it seems that most councils are unable to do this well

7. Do you support the additional policies for rates remission and postponement? **No**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? If the council is unable learn from previous historical data, what are they actually doing. It feels like councils tend to manage with their heads in a hole, unable to read and analyse historical data that have been in front of their eyes for years.

Submitter ID: 523

Hearing? No

Jacqueline Siegenthaler

Constituency: Heretaunga-Hastings

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? **No**

I disagree with the proposal(s) as to me, it's again a 'top down' ratepayer pays for all cost scheme. The regional rates (and District ones) have gone rapidly up over the last few years and this needs to stop. This new proposal is neither fair nor transparent and it seems to be a thinly disguised revenue gathering exercise, that would cost ratepayers dearly. There is no indication of what revenue this new proposed rating system will create and I'm not prepared to support something that is not costed out. Apart from the fact that it would cost ratepayers an increase of 11% just to establish it.

2. Do you support the regional economic development rate proposal? **No**

Just stop taking more and more money of the ratepayers and vulnerable businesses.

3. Do you support the flood protection and drainage schemes proposal? **No**

I have no faith in the last floods 'improvements' out in TA as it obviously really hasn't improved it. Nature will sort itself out well if it's not mucked around with too much interference. Or having the council using the wrong soil for the dam and then it breaks and it's the main cause of the ensuing issues.

4. Do you support the passenger transport rate proposal? **No**

5. Do you support the freshwater science charges and new targeted rate proposal? **No**

No no and no ! Not fair and just another tax take on a natural resource, which belongs to everyone in the first place.

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **No**

Definitely not. Sound like the 'external' directive from the UN and I do not agree with this. New Zealand needs to be fully independent from all external organisations that think they can dictate what is best for New Zealand and it's citizens! I do not agree to any sustainability 'goals' that are pretty much based - to my knowledge - on a random computer model based on questionable data.

7. Do you support the additional policies for rates remission and postponement? **No**

??????

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? The council needs to be fully transparent on it's rates takings and stop the unfettered increasing of the rates pushing all costs to the ratepayers. We all don't need any more of this kind of behaviour or 'policies'.

Submitter ID: 524

Hearing? No

kate laugesen on behalf of Laugesen Farming Ltd

Constituency: Tamatea-Central Hawke's Bay

Type of property/ies: Rural

1. Do you support the proposed move from LV to CV for the general rate? **Yes**

We agree that it is a more equitable and fairer measure to base the rate calculation on

2. Do you support the regional economic development rate proposal? **Yes**

All residents of HB benefit from this rate so we should all contribute towards its cost

3. Do you support the flood protection and drainage schemes proposal? **Yes**

All residents of HB benefit from the flood protection and drainage schemes as these are connected to the infrastructure in all our communities across the region. If they operate effectively then our entire community can continue to go about their lives without the disruption flooding can cause and other infrastructure such as roads do not get damaged by flooding. It is unfair for cost of maintaining these flood protection and drainage schemes to be mainly rated on the land owners in the areas that the schemes are placed as has been in the past. An increase to a 30% contributed by the general rate is an improvement however we feel consideration should be given to increased this further.

4. Do you support the passenger transport rate proposal? **Yes**

User pays is fair way to rate these costs

5. Do you support the freshwater science charges and new targeted rate proposal? **Yes**

User pays is fair way to rate these costs

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Yes**

User pays is fair way to rate these costs

7. Do you support the additional policies for rates remission and postponement? **Yes**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 525

Hearing? No

Leonie Egan

Constituency: Heretaunga-Hastings

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? **No**

Capital value on houses in HB can vary greatly. Land value has less variability.

2. Do you support the regional economic development rate proposal? **Don't know**

3. Do you support the flood protection and drainage schemes proposal? **Don't know**

4. Do you support the passenger transport rate proposal? **Don't know**

5. Do you support the freshwater science charges and new targeted rate proposal? **Don't know**

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Don't know**

7. Do you support the additional policies for rates remission and postponement? **Don't know**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 526

Hearing? No

Aimee Bryden

Constituency: Ahuriri-Napier

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? **No**

It should stay on LV as it is already.

2. Do you support the regional economic development rate proposal? **Don't know**
3. Do you support the flood protection and drainage schemes proposal? **Don't know**
4. Do you support the passenger transport rate proposal? **Yes**
More accessible to people who need this service

5. Do you support the freshwater science charges and new targeted rate proposal? **Don't know**
6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Don't know**
7. Do you support the additional policies for rates remission and postponement? **Yes**
People need more options

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 527

Hearing? No

Christine Smith

Constituency: Ahuriri-Napier

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? **No**

See attached submission

2. Do you support the regional economic development rate proposal? **Yes**

Identification of ratepayers who benefit the most and using this information to allocate costs among groups of ratepayers more appropriately.

3. Do you support the flood protection and drainage schemes proposal? **No**

Whilst all ratepayers benefit from flood protection and drainage schemes, I disagree that the allocation of 30% of flood protection and 100% of river and stream maintenance to the general rate based on capital value is a fair apportionment of cost based on benefits received. See my submission.

4. Do you support the passenger transport rate proposal? **No**

Although this service benefits all ratepayers, the cost is related to usage by the population and should be allocated on a fixed rate per SUIP I agree with the proposed increase in public transport area.

5. Do you support the freshwater science charges and new targeted rate proposal? **Don't know**

Applies to non-urban properties.

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **No**

Although all ratepayers receive some benefit, a percentage split between the general rate and a targeted rate would allow some costs to be allocated to those who have a greater need and receive a greater benefit.

7. Do you support the additional policies for rates remission and postponement? **No**

The remission of rates should apply to those experiencing over a 20% increase in rates regardless of financial hardship. This remission could be phased out over a three year period to enable ratepayers to absorb the increase in rates.

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?

Yes. Please see attached submission.

I have read the documents published on the Hawke's Bay Regional Council, including the Draft Revenue and Financing Policy and the Council's documents relating to the setting of rates and the implications of the proposed change. I have a background in the teaching and application of taxation principles. To evaluate the council's proposals, I have appraised these changes in relation to the key principles as set out by the Council of "clear and fair, simple, consistent and flexible" with regard to my personal situation as a residential home owner on Napier Hill.

The council have done considerable work to identify groups of ratepayers who benefit from various services and set targeted rates or user charges accordingly, such as the change in the rating basis for

Regional Economic Development. This leads to a transparent and fair apportionment of costs for benefits obtained and could be extended.

I question whether there could be further identification of activities within the general rate where some ratepayers benefit more than others. This would include such activities as sustainable land management, biodiversity, flood risk, river investigations, regional water security and river and stream maintenance. Whilst some benefit is obtained by all ratepayers, an allocation of these costs between the general rate and other targeted rates or targeted group of ratepayers, such as non-urban users, could be a fairer apportionment of costs. Whilst this may result in a more complicated rating system, it would possibly lead to a fairer apportionment of rates.

Some activities are rated under a fixed charge per SUIP or are included as a fixed charge as part of the Annual General Charge. I understand that the amount of fixed charges is limited to 30% of total rates. Is it possible for Hawke's Bay Regional Council to increase the percentage of rates that are fixed charges? As there is no change proposed for these charges (except for Economic Development), I presume that there has not been any change from an inclusion in the general rate to a fixed charge, despite the increase in the rates burden on high value properties. A change to a fixed charge could be considered for 'people related' activities such as community sustainability, HBRC Emergency management and public transport.

The biggest change in the rating base is the change from land value to capital value as a basis for the general rate. According to Hinewai Ormsby in the Hawke's Bay Today's article, "Capital value provides a fairer basis for setting rates", capital value is seen to be more equitable and stable because those with more capital have more productive earning capacity, consume more resources and capital values fluctuate less than land value".

Whilst the statement that "those with more capital have more productive earning capacity" may be appropriate for commercial and industrial property and rural areas, it does not necessarily relate to urban residential property. The argument that those with higher value houses can afford an increase in rates may not be valid as this does not take into account the disposable income of those on a fixed income.

The capital value of property being related to "those who consume more resources" is also unproved and is not necessarily valid. I suggest that some charges be moved to a fixed rate per inhabited dwelling.

I am unconvinced that capital values are more stable than land values. In our case our capital value has fluctuated more and increased proportionally more than our land value as overall house prices have risen. The continued housing developments and house improvements will also impact capital value more than land value.

Although capital value has been used by other councils, it is necessary for the Hawke's Bay Regional council to consider what is most appropriate for Hawke's Bay. They need to consider the impact on various groups of property owners and find the best solution for this area. Using the comparison of rates on specific residential properties as a guide, I have compared the current and proposed rates for a house on Napier Hill. This shows a ratio of CV to LV of 3.23%, an increase in the general rate of \$222.37, a rate increase of \$228.74 and a percentage increase of 46%. Perhaps a cap on capital values would be appropriate. I also note that Flaxmere residents face a rate increase of \$23%. How does the council propose to alleviate these significant increases in rates? Spreading the rate increase over the next three years would be helpful.

In conclusion, I suggest that the Hawke's Bay Regional Council extend the work they have done in allocating costs to those that benefit the most by

- further allocation of appropriate costs between the general rate and a targeted rate;
- increasing the application of the fixed charge per SUIP from the general rate to allocate costs that relate to person-related activities;
- reconsidering the appropriateness of the proposed change from land value to capital value for Hawke's Bay and the impact of this change on all ratepayers;
- introducing a system of capping high-value, non-productive, residential house values and spreading the impact of the increase in rates.

A Hone**Constituency:** Tamatea-Central Hawke's Bay**Type of property/ies:** Residential Rural Lifestyle**1. Do you support the proposed move from LV to CV for the general rate? No**

The mis-management of funds, lack of strategic planning and budgeting over the years for maintenance and environmental changes has to end. Ratepayers and constituents should not be picking up the bill for people who are incapable to perform their job or reach the best outcome and results from their work. Elected councils all have a public responsibility to plan ahead for rainy days and to do their jobs properly like the rest of their constituents and rate payers. Councils disregard for learning how to budget, plan both at strategic and operational levels is a dismay. I do not believe the current 'cost of living' hardship impacts the business transactions etc across the councils portfolio's. And if it does - then why aren't there supply chain management best practices and strategies in place for things like bulk consolidation across more regions or even nationally - and strategic buying and partnerships in place? The cost of living hits all of the councils ratepayers and constituents in their home life. It is a fallacy to say that councils are hit to the same detriment. As it appears council is unable to learn from previous weather (ie floods) and environmental historical data - the question must be asked - what are the council staff and their hired contractors/specialists/consultants actually doing?? Do councils manage with their heads in the sand, unable to read and analyse historical data that has been in front of their eyes and readily available to their fingertips over many previous generations and years?

2. Do you support the regional economic development rate proposal? No

Comments as question 1 above. This should already be occurring over many years. Why is this a new thing to do now?

3. Do you support the flood protection and drainage schemes proposal? No

Comments as question 1 above. This should already be occurring over many years. Why is this a new thing to do now?

4. Do you support the passenger transport rate proposal? No

Comments as question 1 above. This should already be occurring over many years. Why is this a new thing to do now?

5. Do you support the freshwater science charges and new targeted rate proposal? No

Comments as question 1 above. This should already be occurring over many years. Why is this a new thing to do now?

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? No

Comments as question 1 above. This should already be occurring over many years. Why is this a new thing to do now?

7. Do you support the additional policies for rates remission and postponement? No

Comments as question 1 above. This should already be occurring over many years. Why is this a new thing to do now?

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?

Comments as question 1 above. As it shout the council has not to date - it must manage their assets/budgets accurately, expertly and prudently. Xero tolerance for monetary waste - no more blow outs or extravagances

Marcel P Wainohu on behalf of R & T Wainohu Whanau Trust

Constituency: Wairoa

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? No

We (R&T Wainohu Whanau Trust) do not support the proposed move from land value to capital value for the general rate. Council also recognise the extension to the definition of non-ratable land, which supersedes some remission criteria in our current policies. This brings the policy in line with Schedule 1AA, Part 4, clause 22 LGA: Provisions relating to Local Government (Rating of Whenua Māori) Amendment Act 2021.

2. Do you support the regional economic development rate proposal? No

We (R&T Wainohu Whanau Trust) do not support the Regional Economic Development rate proposal.

Evaluating the growth options,

The FDS is to be developed in accordance with the requirements of the NPSUD and RMA. Part 2 of the RMA and the NPSUD include a variety of provisions relevant to Māori values and engagement. In particular, engagement with iwi and hapū is required to identify iwi and hapū values and aspirations for urban development, which will inform the development of the FDS.

3. Do you support the flood protection and drainage schemes proposal? Yes

We (R&T Wainohu Whanau Trust) do support the Flood Protection and Drainage schemes rate proposal.

Adaptation finance refers to financial flows which improve the adaptive capacity of human and natural systems to adjust to actual or expected climate-related impacts, and thereby improve a society's alignment to climate-resilient development. Aotearoa New Zealand has a large, unquantified adaptation gap where the need for investment in adaptation greatly exceeds the volume of actual adaptation finance.

4. Do you support the passenger transport rate proposal? Yes

We (R&T Wainohu Whanau Trust) do support the Passenger Transport rate proposal. Council, are proposing to extend the passenger transport rating area to account for urban development since the policy was last reviewed. By extending the rating area, we are able to include more ratepayers with access to public transport near to current routes provided. This means that funds sourced will be fairer and more consistently spread across a larger number of ratepayers and its new footprint.

5. Do you support the freshwater science charges and new targeted rate proposal? Yes

We (R&T Wainohu Whanau Trust) do support the Freshwater Science charges and new targeted rate proposal. (Matauranga Maori). The introduction of a targeted rate to fund water quality science recognises that both consented and non-consented activities, typically from diffuse sources (widespread or dispersed), can exacerbate impacts on water quality, creating the need to monitor and understand water quality across the region.

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? Yes

We (R&T Wainohu Whanau Trust) do support the Sustainable Land Management and Biodiversity/Biodiversity rate proposal. Statement of iwi and hapu aspirations for urban development Several potential Māori cultural opportunities and constraints including identified Māori Land, Areas of Cultural Significance, Marae, and Archaeological Sites. An indicative map and we are partnering with iwi groups to prepare the FDS and fully identify iwi and hapū values and aspirations for urban development and areas that may require protection. A number of other topics discussed in this report address topics of particular relevance for iwi and hapū values including freshwater, indigenous biodiversity, and special landscapes and features.

7. Do you support the additional policies for rates remission and postponement? Yes

We (R&T Wainohu Whanau Trust) do support the additional policies for rates remission and postponement. Māori freehold land is defined in the Local Government (Rating) Act 2002 as land whose beneficial ownership has been determined by a freehold order issued by the Māori Land Court. Only land that is the subject of such an order may qualify for remission or postponement under this policy. Whether rates are

remitted or postponed in any individual case will depend on the individual circumstances of each application.

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?
Nga Waewae Tapu - Te Kaitaonga Haere; Progressive Procurement.

Government agencies are required to look beyond price to the wider social value of engaging Māori businesses. Introduced in 2020, the progressive procurement policy combines elements of social procurement, supplier diversity, indigenous procurement, and wellbeing measures. There are almost 150 mandated government agencies that are required to implement the Progressive Procurement Policy, as part of New Zealand Government Procurement's broader outcomes.



Nga waewae tapu - Topics related to targeted rates and user charges.

The Hawke's Bay Regional Council is encouraging the community to make submissions on its consultation on the principles of how rates are set and who should pay for the services provided.

The council has a responsibility to all its ratepayers to ensure rates are set fairly and regularly reviewed to reflect the dynamic nature of land use change.

We are proposing changes to make it more transparent and fairer across the whole region

"The key principles underpinning the review are clear and fair, simple, consistent and flexible. Through the review, we have managed to reduce the number of individual rate charges from 114 to 48. Of the 48, 23 are unchanged and 25 have been simplified – significantly simplifying rates invoices."

One of the key changes being consulted on is a move from Land Value (LV) to Capital Value (CV) for the general rate. There are five other key consultation topics related to targeted rates and user charges.

"The impact of the cumulative changes will depend on where you live and what services – for instance, flood protection schemes, passenger transport- are provided in your area. Some properties will have a rates increase and some will have a decrease in rates,"

. Our key proposed changes are:

- Moving from land value to capital value for the general rate
- How the Regional Economic Development rate is allocated.
- How we rate our flood protection and drainage schemes
- How we rate our passenger transport
- Freshwater Science changes, including a new targeted rate.
- Simplifying sustainable land management, biodiversity and biosecurity rates
- Improvements and additions to our rates remission and postponement policies

The Revenue and Financing Policy sets how we will fund our activities outlined in long term and annual plans. The funding tools we use include general rates, targeted rates, uniform charges, and fees and user charges. This Policy is one of several policies required by the Local Government Act 2002. How much the Council plans to spend on any group of activities is included within the current Long-Term Plan.

Capital Value for the General rate on Maori Land – Whenua Maori, will not meet all the necessary regulations and/or the compliances required on and for Whenua Maori. The Land Value for General rates meets the minimal requires for Whenua Maori presently.

Changing how we set rates and user charges, through our Revenue and Financing Policy



Nga waewae tapu - Topics related to targeted rates and user charges.

Rates Remission and Postponement Policies.

These policies set the criteria and process for ratepayers to apply for their rates – or parts of their rates – to be reduced, written off, or payment delayed if circumstances warrant it. The Council is specifically consulting on two new policies:

- Hardship remission resulting from changes to the rating system?
- Postponement of Sustainable Homes Voluntary Targeted Rate and proposing minor amendments to bring them up to date?

Rationale for change

The main driver for the change is to treat user categories that benefit in a similar way, the same. In particular, this proposal broadens the user categories who contribute on Capital Value to include rural properties on the basis they can generate income. Examples include wineries, orchards, farms, and 'other' such as forestry and golf courses. '

Businesses are the primary beneficiary of the regional economic development rate through a prosperous community, including demand for goods and services, and labour supply. Residents and lifestyle ratepayers benefit to a lesser degree from enhanced lifestyles from modern amenities, things to see and do, and a sense of security which is vital for health and wellbeing.

Rationale for change

The Council has considered the merits of both land and capital value for the general rate. From a principled perspective, and having considered the overall impacts on all ratepayers, the Council agreed to consult on a change to capital value but wants to hear what you think. Hawke's Bay Regional Council is one of a few regional councils still using land value to calculate the general rate.

In the past 5 years, both Hastings and Napier have seen very strong price increases. In real terms, prices have increased by 78% and 74% for Hastings and Napier, respectively. This is higher than the 33% recorded across the NZ property estate for the same period. In fact, the increase is more than double the NZ rate.

This underlines the relative attractiveness of the local markets, as well as the relatively low base from which the growth occurred (i.e., the properties are comparatively cheaper). The consent data reveals the effects of the price shifts:

- The data shows a (slow) shift towards higher density typologies, and with intermittent spikes in retirement dwellings.
- The weighted average size of consents is tracking down, influenced by higher density developments.
- Overall, detached houses still dominate activity and town houses, and higher density typologies form a small portion of the overall delivery.

Land Value and Maori Land (Whenua Maori) rates.

Throughout this review, the Council has applied the approach that nothing is agreed until everything is agreed.

Changing how we set rates and user charges, through our Revenue and Financing Policy



Nga waewae tapu - Topics related to targeted rates and user charges.

Likewise, we encourage you to think about the big picture – the **cumulative impact** – of all the **improvements we are proposing**, and whether each of the major changes is merited from a principled perspective.

Policies on rates remission and postponement

Māori freehold land Introduction Māori freehold land is defined in the Local Government (Rating) Act 2002 as land whose beneficial ownership has been determined by a freehold order issued by the Māori Land Court. **Only land that is the subject of such an order may qualify for remission or postponement under this policy.** Whether rates are remitted or postponed in any individual case will depend on the individual circumstances of each application.

This policy has been formulated for the purpose of:

- ensuring the fair and equitable collection of rates from all sectors of the community by recognising that certain Māori owned lands have particular conditions, features, ownership structures or other circumstances that make it appropriate to provide relief from rates
- meeting the requirements of sections 102 and 108 and the matters in schedule 11 of the Local Government Act 2002 to have a policy on the remission and postponement of rates on Māori freehold land.

Objectives The objectives of this Policy are:

- to recognise situations where there is no occupier or person gaining an economic or financial benefit from the land
- to set aside land for conservation purposes because of its natural features
- to recognise and take account of the presence of wāhi tapu (sacred areas) that may affect the use of the land for other purposes
- where part only of a block is occupied, to grant remission for the portion of land not occupied.

Conditions and criteria

- Application for a remission or postponement under this policy must be made by the person(s) liable for rates for the land (e.g. owners or trustees), or a person appointed by the Māori Land Court, or other authorised agent of the owners of the land.
- The application is to be made in writing before 30 days of the due date of payment. Applications made after this cut-off date will apply from the beginning of the following rating year.

HBRC will review the appropriateness of remissions on occasion.

The applicant must include the following information in their applications:

- details of the rating unit or units involved. (Maori Land units?)
- documentation that shows that the land qualifies as land whose beneficial ownership has been determined by a **freehold order issued by the Māori Land Court**
- details supporting the applicant's eligibility.

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Nga waewae tapu - Topics related to targeted rates and user charges.

Relief and the extent thereof, is at the sole discretion of Council and may be cancelled or reduced at any time.

HBRC may grant a remission on Māori freehold land of up to 100% of all rates for the year to which the application applies, based on the following criteria.

The land is in multiple ownership:

- where the level of gross income derived from the land is not sufficient to cover the cost of rates levied on that land (Aggregation, Amalgamation, Partition orders)
- where it is not possible to identify or locate the owners, or those liable to pay rates on the land.
- the support for the use of the land by the owners for traditional purposes (Customary Land rights)
- the support for the relationship of Māori and their culture and traditions with their ancestral lands (Tikanga – Customary rights)
- recognition of the presence of wāhi tapu (sacred areas) that may affect the use of the land for other purposes. – **Nga Waewae Tapu.**

recognition of the importance of the land for community goals relating to:

- the preservation of the natural character of the coastal environment
- the protection of outstanding natural features
- the protection of significant indigenous vegetation and significant habitats of indigenous fauna
- No application under this policy will be automatically backdated; however, having granted a remission on a property under the criteria laid down, Council may remit (write -off) outstanding arrears owing on that same property.

Delegated authority

Decisions on the remission and postponement of rates on Māori freehold land are delegated to the Group Manager Corporate Services or the Chief Executive.

Review of policy

This Policy will be reviewed at least every three years to ensure that the conditions and criteria on which the Policy is based continue to be relevant and appropriate.

Te Puni Kokiri – Ministry of Maori Development (Maori policy?)

Te Pae Tawhiti is the Government approach to protecting and enabling appropriate use of matauranga Maori. This Wai 262 report found the Government needs to take significant steps to address the issues highlighted. As these issues are complex it will take time, possibly several years.

Te Puni Kokiri work programme has 11 focus areas that will help address the issues as well as achieve broader outcomes. It requires commitment from a range of Ministers and government agencies coming together to work alongside each other, Maori, and the wider public.

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Nga waewae tapu - Topics related to targeted rates and user charges.

Whenua Maori Services

The Government's Whenua Maori programme – Whenua Maori services as an approach to supporting landowners (Customary Land rights) to realise their aspirations and undertake to address some of the challenges whanau encounter when trying to connect to, develop and use their whenua and customary rights (the Landowner journey).

This included a network of skilled Regional Whenua advisors, providing easier access to land data, information and digital tools. Also promoting changes to legislation to simplify and improve legal processes for landowners – customary rights.

Customary rights in Land -Tikanga Maori

Setting out brief histories of the iwi and hapū of who were on the land in 1840, it would be useful to make some broad points about customary land use in the same way that relevant general points were made about the term's 'iwi', 'hapū' and 'whanau'.

This will give us a context in which to understand the fluidity of boundaries, overlapping interests and shared user rights among the iwi and hapū in this district. The wars waged between the early inhabitants of Aotearoa and the subsequent waka tūpuna were carried on for generations by the descendants of both groups and considerably influenced the nature of land rights. Take raupatu (right by conquest), for example, cut across whenua kitea hou (right by discovery).

Many iwi and hapū during this period broke up and were scattered, the conquered to re-establish themselves elsewhere, the victors to enjoy the new territory and its resources which were the spoils of victory. The natural and physical resources of Te Taiao, over which Māori exercised management and control included the land, mountains, lakes, waterways, and all things on or in them – living or inanimate. Traditionally Māori did not 'own' land, but instead sought to develop a relationship with the land as Kaitiaki a place upon which they could place their feet with confidence and without fear of their rights being challenged.

A hapū's continued use of the resources on the land, even if only seasonal, strengthened their rights, regardless of whether the land derived from prior discovery, conquest, gift, or inheritance. Those rights were evidenced, for example, in the hapū's named birding trees and the trails to track bird migrating patterns usually as berries ripened. 61 While hapū interests were weakened through absence or irregular use, absence without ahi kā did not necessarily terminate all interests.

Some hapū shifted with the seasons, exploiting resources in different places and relocating from their usual residence to temporary kāinga for months at a time before returning. Resource management had a clear intergenerational aspect to it, of which attachment to the land was a natural consequence : This attachment embodied a 'wise use' policy. That is, there was an awareness that resources could be exhausted by over-use, and groups believed that their continued physical and (maybe more important) cultural existence was tied to their resources – land, waterways, etc.

In terms of use-rights, the assessment of the application of European 'straight line' boundaries to the fluid and flexible markers of customary title : Resource rights were complex, convoluted and overlapping.

They almost never phased clearly from hapu to hapu as one panned across the customary landscape. Instead, most resource complexes had primary, secondary, and even tertiary

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Nga waewae tapu - Topics related to targeted rates and user charges.

right holders from different hapu communities, all with individual or whanau interests held in accordance with tikanga (customary rights) and therefore by consent of their respective communities.

Put another way, hapū were bound to the land through relationships that had resulted from the land being handed down the whakapapa line. Over time they evolved systems of resource management including the allocation of resource use-rights to whānau and sometimes other hapū, and systems of social organisation whereby rights to harvest, use, and occupy were controlled in the interests of the hapū as a whole. Use-rights accorded to individuals were generally conditional upon a regular contribution to the community and acceptance of its authority and norms.

Finally, it should be noted that people were mobile and could reside for a time among another iwi or hapū because of their close whakapapa ties, or through intermarriage (which were almost always strategic) or, in the case of refugees, because of the goodwill of the rights-holders.

Thus, these new or renewed whakapapa connections would enable them to access a different set of resources. The complex web of relationships among iwi and hapū in the Hawke Bay Region or Ngati Kahungunu nui tonu highlights the need for a thorough appreciation of whakapapa (whanau, hapu & Marae) and its treatment when trying to comprehend customary rights concerning te waewae tapu.

Rationale for change

The Council acknowledges that ratepayers may experience a variety of financially challenging situations that impact their ability to meet payment deadlines for rates. The proposed changes provide a wider range of options to support ratepayers experiencing financial hardship. We also recognise the extension to the definition of non-ratable land, which supersedes some remission criteria in our current policies. This brings the policy in line with the **Schedule 1AA, Part 4, clause 22 LGA: Provisions relating to Local Government (Rating of Whenua Māori) Amendment Act 2021**.

The changes are part of the Government's wider commitment to supporting whānau and regional development through whenua by;

- reducing the barriers for owners of Māori freehold land who want to use, occupy, build houses on, and develop their whenua, particularly for those who have rates arrears.
- stimulating regional development – the value of fully utilising and developing Māori land could result in benefits of up to \$1.4 to \$2 billion over 40 years?
- providing greater consistency, equity and clarity around the rating of Māori land for the benefit of Māori landowners and local authorities?

Key changes

The key changes to the legislation to support the use and development of Māori land will:

- provide local authorities with the power to remove rates arrears.

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- make most unused land non-rateable including **Ngā Whenua Rāhui kawenata** land that has been set aside for conservation purposes.
- provide a statutory rates remission process for Māori land under development.
- allow multiple Māori land blocks from a parent block to be treated as one for rating purposes.
- enable individual houses on Māori land to be rated as if they were one rating unit. This will enable low-income homeowners on blocks with more than one home to access rates rebates.

Other changes

The legislation relating to the rating of Māori land remained unchanged for almost 100 years. Changes to modernise the legislation affecting the rating of Māori land will:

- provide protection to Māori land made general land by the Māori Affairs Amendment Act 1967 from being leased or sold as “abandoned land sales”.
- remove the arbitrary two-hectare limit on the non-rateability for marae and urupā.
- extend the non-rateability for marae to all land, not just those on a Māori reservation.
- clarify the obligations on Maori and/or Whanau trustees to declare income received from land if requested to ascertain rates liability.
- clarify that homes on Māori reservations are liable for rates.
- reference the preamble of **Te Ture Whenua Māori Act 1993** in relevant local government legislation to signal the intent of the rating changes.

A number of other changes have been made to modernise the legislation affecting the rating of Māori land. These changes include:

- providing protection to Māori land converted to general land by the Māori Affairs Amendment Act 1967 from being sold as ‘abandoned land sales’
- removing the arbitrary two-hectare limit on the non-rateability for marae and urupā
- extending the non-rateability for marae on all kinds of land, not just those on a Māori reservation
- clarifying the obligations on Maori/Whanau trustees to declare income received from land if requested to work out rates liability
- clarifying that homes on Māori reservations are liable for rates
- referencing the principles of Te Ture Whenua Māori Act 1993 in local government rating legislation to signal the intent of the changes.

We understand that earlier research has estimated potential housing capacity in the wider rural environment, beyond the rural residential zones. For example, in the Rural Zone in Hastings, a lifestyle lot can be subdivided off larger lot every three years.

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In addition, all zones within Hastings allow for Papakainga housing developments (on ancestral land), which has been utilised in recent times for several Marae based housing developments on the Heretaunga Plains (close to urban areas).

Importantly several more Papakainga developments are under investigation and could potentially add in the order of 110 to 300 additional dwellings to meet Māori housing needs. In addition there are approximately 70 existing lots in the Plains Production Zone that are entitled to have a dwelling erected upon them. In the context of the NPS-UD, the key required for plan-enabled is 'land is zoned for housing or for business use (as applicable) only if the housing or business use is a permitted, controlled, or restricted discretionary activity on that land'.

Kaitiakitanga – Environmental Social Governance

Postponement in cases of financial hardship or natural disaster

Introduction

This policy is prepared under sections 102(5)(b) and 110 of the Local Government Act 2002.

Objective

- To assist ratepayers experiencing short term extreme financial hardship that affects their ability to pay rates.
- To assist ratepayers whose property has been subject to a natural disaster to the extent that ratepayer is unable to pay rates.

Conditions and criteria

The financial hardship must be caused by circumstances beyond the ratepayer's control. The postponement of rates in cases of financial hardship is a last resort to assist residents who own the property to which the postponement application applies.

Criteria for the postponement of rates for ratepayers in cases of hardship

- The applicant can illustrate a postponement of rates will help them overcome their short term extreme financial hardship.
- The applicant has no access to other funds to pay the rates due. Criteria for the postponement of rates for ratepayers in cases of natural disaster
- The applicant is unable to pay their rates bill because of a natural disaster or severe weather event that has severely impacted on their ability to pay rates, but a postponement will help enable them to pay in the future.

Other conditions

Approval of rates postponement is for one year only. The applicant must reapply annually for the continuation of a rates postponement.

Delegated authority

Decisions relating to the postponement of rates in cases of financial hardship are delegated to the Chief Executive. Decisions related to the postponement of rates in cases of natural disaster are retained by Council.

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Nga waewae tapu - Topics related to targeted rates and user charges.

Review of policy

This Policy will be reviewed at least every three years, to ensure that the conditions and criteria on which the Policy is based, continue to be relevant and appropriate.

Remission in special circumstances

Introduction

In order to allow rate relief where it is considered fair and reasonable to do so, HBRC has resolved to adopt policies under sections 102 (5) (a) and 109 of the Local Government Act 2002 specifying the circumstances under which rates will be considered for remission.

There are various types of remission, and circumstances under which a remission will be considered. A remission will not be granted where an entity has qualified under the Local Government (Rating) Act 2002 (LGRA) for partial non rating under Part 2 of schedule 1.

The conditions and criteria relating to remission in special circumstances are set out in the following.

1. Remission of rates in special circumstances.

Policy objective

To provide for the possibility of a rates remission in circumstances that have not been specifically addressed in other parts of HBRC's rating policy.

Conditions and criteria

- HBRC may remit all or part of the rates assessed in relation to a particular rating unit in special or unforeseen circumstances where it considers it just and equitable to do so.
- The approval of the remission must not set a precedent that unfairly disadvantages other ratepayers.
- A remission under this policy will apply for one year only. Applicants must reapply annually.
- No application under this policy will be backdated. Rates arrears on the land as at 1 July 2004 will remain outstanding until such time as HBRC is no longer legally able to pursue the collection of rates.
- All applications must be received in writing detailing the rating unit(s) involved and any other relevant information supporting the applicant's eligibility for the remission.
- The application for a rates remission must be made before seven days of the due date of payment.

Delegated authority

Decisions relating to the remission of rates in special circumstances are delegated to the Group Manager Corporate Services or the Chief Executive.

Review of policy

This Policy will be reviewed at least every three years, to ensure that the conditions and criteria on which the Policy is based, continue to be relevant and appropriate.

2. Remission of penalties on rates Objective

To enable HBRC to act fairly and reasonably when a rates payment has not been received by the due date.

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Nga waewae tapu - Topics related to targeted rates and user charges.

Conditions and criteria

Upon receipt of an application from the ratepayer either in written or email format, or if identified by Council, a penalty may be remitted where at least one of the conditions listed below are met.

- A full payment of outstanding rates due (excluding a penalty amount) has been made prior to the application being received by the Council, and if the ratepayer has previously paid all rates by the due date within the last three years.
- Where a ratepayer has rate arrears, that on entering and adhering to a payment plan, the additional penalties will be remitted at an agreed time.
- Where payment has been late due to an unforeseen disruption to the normal activities or business of the ratepayer, i.e. serious illness, case of death, injury, accident of family member, or family circumstances.
- The late payment was caused by matters outside of the ratepayer's control
- It is demonstrated that the penalty has been levied because of an error by Council.
- Where it is considered just and equitable to do so. Each application will be considered on its merits.

Matters that will be taken into consideration by Council under above include:

- the ratepayer's payment history
- the ratepayer entering into an agreement with Council for the payment of rates
- matters controlled by the ratepayer may include electronic payment errors, late posting of payment, failure to update mailing or direct debit arrangement
- matters out of the control of the ratepayer may include payments missing in transit, change of ownership, bank errors.

Where there is a deliberate non-payment, remission will not be granted. Council reserves the right to impose conditions on the remission of penalties.

Delegated authority

Decisions relating to the remission of penalties on rates are delegated to the Group Manager Corporate Services or Chief Executive.

Review of policy

This policy will be reviewed at least every three years to ensure that the conditions and criteria on which the policy is based, continue to be relevant and appropriate.

3. Remission of rates on properties affected by natural calamity.

Objective To help ratepayers experiencing extreme financial hardship due to natural calamity which affects their ability to pay rates.

Conditions and criteria

- Applicable where erosion, subsidence, submersion, or other natural calamity has affected the use or occupation of any rating unit. Does not apply to erosion, subsidence, submersion, etc that may have occurred without a recognised major event.
- HBRC may, at its discretion, remit all or part of any rate assessed on any rating unit so affected by natural calamity.
- HBRC will set the criteria for remission with each event. Criteria may change depending on the severity of the event and available funding at the time.

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- HBRC may require financial or other records to be provided as part of the remission approval process.
- Remissions approved under this policy do not set a precedent and will be applied only for each specific event and only to properties affected by the event.

Delegated authority

Decisions relating to the remission of rates on property affected by natural calamity are delegated to the Group Manager Corporate Services or the Chief Executive.

Review of policy

This Policy will be reviewed at the least every three years, to ensure that the conditions and criteria under which the Policy is based, continue to be relevant and appropriate.

Sendai Framework – 2030 Agenda.

For centuries, insurance and other risk transfer mechanisms have been used to manage risks that would be too large for people, communities, and companies to bear on their own. By transferring some exposure to third parties with more stable financial basis in exchange of a premium, insurance has historically facilitated entrepreneurship and economic growth in developed countries. Evidence is emerging that if properly designed, insurance can also be useful in reducing risk. Risk transfer tools like insurance have the potential to be useful for communities to manage the disaster risks posed by climate change as well.

Insurance has limitations: it does not prevent the loss of lives or assets. It is not always the most appropriate option to manage risks, in terms of cost-effectiveness or affordability. With climate change, insurance tools will be challenged to cover increasingly frequent and intense events.

Furthermore, traditional insurance may not be the appropriate tool for longer term foreseeable risks like sea-level rise and desertification. In such cases, other measures including basic investments in risk reduction make more sense. Insurance on its own is not the solution. Insurance could fail to reduce risk and to advance adaptation unless it is implemented along with disaster risk reduction measures.

Public-Private Partnerships; for cooperative and mutual insurance.

Seven mechanisms for supporting disaster risk reduction and resilience through cooperative and mutual insurance A combined view of insights gleaned from a review of literature and an analysis of mutual and cooperative insurance case studies converges on a set of practical mechanisms for how the cooperative and mutual insurance sector could help drive prevention and disaster risk reduction:

Seven mechanisms for supporting disaster risk reduction and resilience through cooperative and mutual insurance,

Direct mechanisms – for insurance products to reduce disaster risks:

1. Apply variable pricing of insurance to provide incentives for risk reduction
2. Include prerequisites and exemptions to provide incentives for risk reduction

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Nga waewae tapu - Topics related to targeted rates and user charges.

3. Ensure investment reduces and prevents risk and builds resilience Indirect mechanisms – for insurance providers to reduce disaster risks:
4. Raise awareness of the systemic nature of risks and provide transparent information and advice for reducing hazards, exposure, and vulnerability
5. Build and share capacity and technology for risk modelling, analysis and monitoring
6. Promote and enhance local social capital for responding to disasters and innovating to reduce risks
7. Collaborate with the public sector to signal unsustainable development and support decision making towards disaster risk reduction and risk-informed investment while closing protection gaps.

The mechanisms provide a practical way for the (cooperative and mutual) insurance sector to implement the Sendai Framework for Disaster Risk Reduction.

Through public-private partnerships and the sharing of a unique treasure-trove of risk data, these mechanisms also support implementation of the 2030 Agenda for Sustainable Development and the Paris Agreement.

They do so by contributing to reducing exposure and vulnerability to an increasingly complex and intensifying risk landscape. The mechanisms also support reducing the severity and occurrence of the very hazards that stand in the way of achieving the SDGs by 2030, such as climate change, the spillover of zoonotic diseases, and technological disasters, to name but a few.

As the frequency and intensity of extreme weather events mount, the urgency of building on successful risk reduction initiative is increasing as well.

The indicators show that insurance can be a useful component of a comprehensive risk reduction strategy. Insurance solutions can only support effective adaptation where they are implemented among measures to reduce disaster risk and increase societal resilience. If not embedded in a comprehensive risk reduction strategy, insurance may actually encourage risk taking behaviour, potentially leading to greater fatalities and damage.

Today the need is greater than ever to reduce and transfer risk in ways conducive to climate change adaptation and sustainable development. Insurance, if properly designed, can be a valuable risk management tool to support adaptation in developing countries. To harmonise climate risk insurance with adaptation, it is essential to align incentives with disaster risk reduction.

The chance to establish a comprehensive risk management framework that prioritises disaster risk reduction. Planning with the end in mind—to help developing countries adapt to and manage the climate risks they face—will help negotiators fit elements like insurance into a larger adaptation package. By placing disaster risk management and risk reduction first, insurance mechanisms in the emerging climate agreement could be designed in ways that help motivate and shape resilience and adaptation to climate change.

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About regional economic development

This activity promotes economic development for the region through contributions to Hawke's Bay Tourism and a funding arrangement with the Regional Economic Development Agency (REDA).

HBRC is the sole local government funder of Hawke's Bay Tourism by agreement with the region's other local councils. The region's newly established REDA is a tri-party partnership between business, iwi, hapū, and local government.

There is a funding agreement with the five councils, including HBRC, for a 29% split of the local government contribution. The total cost of regional economic development is \$2.3M* in 2023-2024 and is fully funded by this rate.

Rationale for change

The main drivers for change are:

- more consistency between similar schemes
- simplified rating differentials
- to spread the costs fairly across scheme beneficiaries.

The proposed changes will see the same rating basis and split of general and targeted rates across like schemes. Capital Value will be consistently applied as the rating basis for all but two of the drainage and pumping schemes. Capital Value is considered the most appropriate basis for the targeted rate component given flood protection and drainage activities benefit improvements on land as well as land, and the productive earning potential resulting from the activity.

Hawke's Bay Regional Council administers a mix of flood control, drainage, and stream (or channel) maintenance schemes. We maintain networks of stop banks, hydraulic structures, and pump stations to ensure they work as expected during heavy rain to help protect life and property. Rivers and stream maintenance schemes typically have no infrastructure and can involve planned or reactive interventions. Stream maintenance schemes are proposed to be moved to the general rate.

Rationale for change

We are proposing to extend the passenger transport rating area to account for urban development since the policy was last reviewed. By extending the rating area, we are able to include more ratepayers with access to public transport near to current routes provided. This means that funds sourced will be fairer and more consistently spread across a larger number of ratepayers and its new footprint.

We are also proposing to change the rating basis from LV to CV as passenger transport delivers benefits more closely aligned with capital value. For example, capital improvements to land may result in more jobs, therefore more people needing public transport. This will mean that some properties will pay slightly more, while others pay slightly less. Those ratepayers with a larger gap between CV and LV than the average will pay proportionately more than before.

HBRC Climate Adaptation finance planning – User charges.

Adaptation finance refers to financial flows which improve the adaptive capacity of human and natural systems to adjust to actual or expected climate-related impacts, and thereby improve a society's alignment to climate resilient development.

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Nga waewae tapu - Topics related to targeted rates and user charges.

Aotearoa New Zealand has a large, unquantified adaptation gap where the need for investment in adaptation greatly exceeds the volume of actual adaptation finance.

Closing that gap is critical to climate resilient development. This will require not only increasing the volume of existing financial flows, but also diversifying the sources of funding and financing. Explores the potential of financial innovation to overcome barriers to investment and lending for climate adaptation. The primary focus is the instrument level to encourage diversification of the sources of finance, to enhance cross-sectoral coordination, and to overcome the barriers that otherwise impede investment.

However, there is a secondary focus on the system level, especially to improve the enabling environment for *the development of an investment-ready pipeline of adaptation projects*. To diversify the sources of adaptation finance, it is critical to activate a combination of allocative principles.

Key principles for allocating duties to pay for adaptation are:

- The polluter-pays principle holds that those who contribute to global heating and/or maladaptation should bear the costs of managing it.
- The beneficiary-pays principle holds that the cost of producing goods should be borne by those who benefit from those goods.
- The public-pays principle holds that the costs of adaptation should fall generally on taxpayers or ratepayers.
- The ability-to-pay principle holds that duties vary with ability, so more abled (i.e. wealthier) agents have greater duties to bear the cost of climate adaptation than less abled agents.

This methodology involved a scan of international best-practice and academic literature to identify viable financial instruments, which are subsequently adapted to local circumstances by engaging with Māori experts and key stakeholders in central and local government, finance sector, business and civil society.

Options were screened against the following criteria:

- The instrument must diversify the sources of funding and finance beyond central and local government. This is to align with overlapping allocative principles and to reduce the total burden on public funds.
- The instrument must do no harm to Māori and should instead be optimised for the active protection of Māori interests. This is to recognise the risk that climate finance instruments may exacerbate existing inequalities if poorly designed. (Capital value)?
- The instrument should be technically feasible, but not constrained by economic or political feasibility. This is to strike a balance between encouraging innovation and avoiding moral hazard. There are a diverse range of potential instruments for adaptation finance, each of which has unique strengths and challenges.

Rationale for change

The main driver for change is to share the costs fairly amongst those who contribute to the need for this work.

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Nga waewae tapu - Topics related to targeted rates and user charges.

The introduction of a targeted rate to fund water quality science recognises that both consented and non-consented activities, typically from diffuse sources (widespread or dispersed), can exacerbate impacts on water quality, creating the need to monitor and understand water quality across the region. Sharing the costs will better reflect exacerbation on water quality as well as reducing the burden on the small number of consent holders who discharge to water and land (approximately 700) who currently pay 35% of the total water quality science costs as part of their section 36 charges.

Fair and reasonable charges to consented activities.

Our starting point was to consider 'to what extent do consentable discharges exacerbate impacts on water quality'. In the absence of any current modelling that would enable source apportionment on a regional scale, the Council concluded that land area is the best way to address the question. (Land value).

The region was spatially examined for land parcels which were attracting section 36 charges. 'Built up areas' benefiting from an interconnecting network were also included. This was then adjusted for 'unproductive' land and overall impact, resulting in the proposal that section 36 charges to consent holders be applied at 15% of the water quality monitoring costs, and 20% as a targeted rate on non-urban properties.

About environmental science and information – Matauranga Maori

This activity involves the monitoring and analysis of environmental information and research and investigations on matters relevant to policy development and regional plan implementation.

The information gathered and science activities are also needed to issue consents. The total operating cost of the combined activity is \$11M* in 2023-2024.

- Air Quality – \$761K* is general rate funded
- Land Monitoring and Research - \$958K* is general rate funded, \$319K* is targeted rate funded
- Marine & Coast - \$966K* is general rate funded
- Other Research & Grants - \$88K* is general rate funded • State of the Environment reporting - \$224K* is general rate funded • Water Quantity - \$2.6M* is general rate funded, \$1.2M* is fees & charges funded
- Water Quality - \$2.1M* is general rate funded, \$635K* is targeted rate funded, \$476K* is fees & charges funded
- Water Info Systems – \$421K* is Fees & User Charges funded.

Matauranga Maori

Ngā Whenua Rāhui already makes up around 13 percent of Māori land and ranges from small blocks (1 ha) to large forests (17,000 ha +). Māori land blocks host around a third of indigenous vegetation on private land across Aotearoa. This is a substantial investment in the environment as well as providing cultural, social and economic benefits to the local community.

Rationale for change Sustainable land management.

The main driver for change is to spread the costs of sustainable land management to all ratepayers to recognise the whole of region, communitywide benefits of this work. Sustainable land management contributes to a healthy environment.

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Nga waewae tapu - Topics related to targeted rates and user charges.

The community as a whole benefits from reduced environmental pressures from good land management practices and compliance with regulations such as farm plans.

Biodiversity and biosecurity

The main driver for change is to simplify how we rate for biodiversity and biosecurity activities by treating all work we do for biodiversity outcomes as one group. All the work we do for primary production benefits are treated as another.

Biodiversity related work, including possum control, was then assessed as having whole-of-region, community-wide benefits. The Council considered the general rate to be the most appropriate funding source. In contrast, 'primary-production pests' including rooks, rabbits, and some plant pests was assessed as benefiting parts of the community, namely primary producers.

A 100% targeted rate was considered the most appropriate funding source. The removal of the 4 hectares rating threshold also removes administrative burden and ensures smaller parcels of land pay their share. Impacts Combined, these changes will result in \$2.7M* net moving from targeted rates to general rates. Urban ratepayers will be most impacted from the shift to the general rate.

Improvements and additions to our rates remission and postponement policies

Te Kaitaonga Haere - Progressive Procurement

Government agencies are required to look beyond price to the wider social value of engaging Māori businesses. Introduced in 2020, the progressive procurement policy combines elements of social procurement, supplier diversity, indigenous procurement, and wellbeing measures.

Our (TPK – Maori Development) joint programme with MBIE aims to spread the benefits of the Government's \$51.5 billion spend per year on procurement of goods and services to the wider community. In the first two years we engaged with over 600 Māori businesses across 25 industries. Our successful programme secured a further \$26 million over two years in Budget 2022. Through this investment we are scaling up our targeted Māori business support, increasing our local networks, and working with agencies to improve procurement practices and be more inclusive.

1. There are almost [150 mandated government agencies](#) that are required to implement the Progressive Procurement Policy, as part of New Zealand Government Procurement's broader outcomes.
2. For the purposes of progressive procurement, the definition of a Māori business is minimum 50% Māori ownership or classified by IRD as a Māori authority.

Other main features of the Progressive Procurement Policy are:

- A target of 8 percent of the total number of governments' annual contracts are awarded to Māori businesses.
- Intermediary organisations to act as a broker, matching and connection buyers and suppliers to realise procurement opportunities. Further, to assist with verifying supplier businesses as meeting the definition of Māori business.

Changing how we set rates and user charges, through our Revenue and Financing Policy



Nga waewae tapu - Topics related to targeted rates and user charges.

- Supporting sustainable, long term behavioural change of government agencies and businesses procurement practices.

Māori are recognised and enabled as kaitiaki for mātauranga Māori and taonga Māori.

Wai 262 issues are complex and multi-faceted, encompassing topics as diverse as natural resources, te reo Māori, and intellectual property. A common thread is the ability of Māori to act as kaitiaki for mātauranga Māori and taonga. A comprehensive partnership approach to the protection, development, and use of mātauranga Māori and taonga will help unlock the economic, social and cultural potential of te ao Māori, inclusive of the whole of Aotearoa New Zealand.

Touching on matters of great importance to Māori and the Māori–Crown relationship, this mahi offers a unique opportunity to partner with Māori and, together, “learn by doing”. Tackling Wai 262 issues in this way has the potential to fuel innovation, strengthen national identity, and enhance our international reputation, as well as deliver direct benefits to Māori.

Natural resources are fundamental to the cultural, social and economic wellbeing of Māori. Māori and iwi have a partnership role in the governance and management of natural resources and the response to climate change, to strengthen Māori economic and community resilience.

Whānau Ora is a culturally embedded and holistic approach to achieving whānau wellbeing. There is considerable evidence that conventional service delivery does not work for Māori. Whānau Ora has been shown to be an effective and transformative approach to support whānau to meet their needs and achieve their aspirations.

Within an overall Whānau Ora approach there are two key components that drive towards improving outcomes for Māori: Whānau Ora commissioning, and broader whānau-centred approaches to inform government policy and service delivery.

Current sector activity

Te Puni Kōkiri is working towards a medium-term vision which includes Whānau Ora being adequately resourced to support whānau to achieve their aspirations, is appropriately supported across government agencies, and that whānau are able to play a key role in local decision making regarding Whānau Ora support.

This includes growing investment in the Whānau Ora commissioning approach, considering the application of whānau-centred approaches in new areas, empowering more localised approaches to whānau support, and improving data and information systems.

There is an opportunity to review the existing kaitiaki arrangements to ensure Whānau Ora is adequately supported across government and strengthened to remain responsive and accountable to whānau. Preliminary work is under way to consider whether alternative kaitiaki arrangements would position Whānau Ora to deliver more for our whānau and communities and includes consideration of recent changes to the Public Service Act 2020.

Local government is on the front line of climate change.

Councils have statutory responsibilities to avoid or mitigate natural hazards and to have regard to the effects of climate change when making certain decisions. They are also responsible for civil defence and emergency management, as well as improving community resilience through public education and local planning.

Changing how we set rates and user charges, through our Revenue and Financing Policy



Nga waewae tapu - Topics related to targeted rates and user charges.

Around the country, many councils are already working with communities and iwi/Māori to address the climate change impacts. Some are developing adaptation plans and long-term adaptive pathways to proactively manage future risk. However, climate preparedness varies from region to region.

Embedding climate resilience across government

The Government will embed climate resilience across all its strategies and policies. The following chapters in the plan have actions relevant to local government:

Natural environment

- Action 6.2 Engage with councils to implement the New Zealand Coastal Policy Statement.
- Action 6.4 Implement the proposed National Policy Statement on Indigenous Biodiversity.

Homes, buildings and places

- Action 7.4 Update regulatory requirements to ensure buildings are designed and constructed to withstand more extreme climate hazards.

Infrastructure

- Action 8.6 Invest in public transport and active transport.
- Action 8.8 Support knowledge sharing and the implementation of adaptation actions across the sector.

Communities

- Action: 9.1 Modernise the emergency management system.

Economy and Financial System

- Action 10.9 Identify the impacts of climate change on regional economies.
- Action: 10.14 Deliver the Tourism Industry

Transformation Plan.

- Action 10.15 Review the settings for the International Visitor, Conservation and Tourism Levy.

Currently, international visitors do not directly pay for many products and services they use where these are funded by local communities. The Ministry of Business, Innovation and Employment (MBIE), directed by the Minister of Tourism, is reviewing the International Visitor Conservation and Tourism Levy (IVL).

This includes ensuring international visitors contribute to resilient, adaptable infrastructure and the natural environment they use during their visit. Resilient infrastructure, including a healthy environment, will reduce the risks from extreme weather. This action will support a focus on the spending priorities of the IVL, as well as any further work across the life of the national adaptation plan (eg, other tools) to support adaptation and climate resilience in tourism.

Many communities are already under threat from natural hazards events.

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Nga waewae tapu - Topics related to targeted rates and user charges.

Successfully adapting will be vital as climate impacts worsen. Some people and communities may have to alter how and where they live.

One option is managed retreat, which may be necessary to reduce or eliminate exposure to intolerable risk. It's a carefully planned and managed process of relocating assets, activities and sites of cultural significance away from at-risk areas. The plan will support councils to understand the adaptation options available.

Key actions include:

- Action 5.1 Pass legislation to support managed retreat: this will address the complex issues around retreating from at-risk areas exposed to climate hazards.
- Action 5.2 The future for local government review: this is likely to include recommendations on what local government does, how it does it, and how it pays for it.

This will include what should change in funding and financing to ensure viability and sustainability, fairness and equity, and maximum wellbeing.

- Action 5.3 Complete case study to explore co-investment for flood resilience: this will focus on addressing the challenges facing small local authorities and vulnerable communities in funding flood risk management.
- Action 5.5 Publish the programme of work on how Aotearoa meets the costs of climate change and invests in resilience: this will investigate additional investment from public and private sources to respond to the growing risks from climate change.
- Action 5.6 Scope a resilience standard or code for infrastructure: this will encourage risk reduction and resilience planning in existing and new assets
- Action 5.9 Prioritise nature-based solutions: this will investigate how to ensure nature-based solutions are considered in planning and regulations, where possible, for both carbon removals and climate change adaptation.

Other actions in this chapter relevant to local council action include:

- Action 5.11 Encourage and support the evaluation of climate risks to landfills and contaminated sites.
- Action 5.12 Explore funding options to support the investigation and remediation of contaminated sites and landfills vulnerable to the effects of climate change.
- Action 5.13 Connect communities to wider response and recovery support.

Te Ara Paerangi Future Pathways

The research, science and innovation (RSI) sector has served New Zealand exceptionally well over the past 30 years. It is now timely to consider how we can best position our research system for the future.

It is clear from multiple reports and our previous consultation exercises that more work needs to be done to explore how the research system can best uphold Te Tiriti obligations and opportunities.

Changing how we set rates and user charges, through our Revenue and Financing Policy



Nga waewae tapu - Topics related to targeted rates and user charges.

We must consider how to embed Te Tiriti within the fabric of the research system, in decision making, in our processes, in collecting advice and information, in our workforce, and in research outcomes. We need to consider the diverse ways in which Māori organise as iwi, hapū, whānau, businesses, interest groups, subject matter experts, researchers and as individuals. We need to reimagine how to give life to Māori research aspirations, the right ways to enable mātauranga Māori - Māori knowledge - in our research system and the interface between mātauranga Māori and other activities in the system.

Lack of recognition of Te Tiriti, and protection and support for mātauranga Māori in New Zealand, is well documented. The Waitangi Tribunal described in Ko Aotearoa Tēnei that: "successive colonial and post-colonial governments in New Zealand have been hostile to the survival of Māori culture generally and of mātauranga Māori in particular".

On the RSI system specifically, the Tribunal took the view that mātauranga Māori remained "clearly at the ... margins". The authors of Te Pūtahitanga point to entrenched values that result not only in Māori knowledge continuing to be undervalued within the RSI system, but also "underinvestment in Māori research infrastructure, Māori capacity and Māori science advice."

They argue within the RSI sector generally, there is a strong belief that Western science is universal and culture-free, and that it should be as values-free as possible... It is the belief in objectivity and universality that enables Western scientists to hold their own knowledge system above others, often in a non-critical way.

New laws supporting succession to whenua Māori

Succession is when interests or shares in whenua Māori are passed on to whānau after the death of a landowner. Succession is a formal process managed through the Māori Land Court. The Court processes more than 2,000 succession applications each year.

Law changes introduced by Te Ture Whenua Māori (Succession, Dispute Resolution, and Related Matters) Amendment Act 2020 update Te Ture Whenua Māori Act 1993 to better support whānau to succeed to their land.

Te Ture Whenua Māori Act has been changed in the following areas. These changes come into force on Waitangi Day, 6 February 2021:

1. Historically all succession applications needed to be heard in court. The Act now enables **simple and uncontested succession applications** to be dealt with by a Māori Land Court registrar, instead of going through a full court hearing process.
2. Historically, interests in land only passed to the deceased owner's descendants when their spouse or partner (who does not whakapapa to the land) died, entered a new relationship, or surrendered the interests. The Act has been updated to enable **descendant's immediate succession to their Māori land interests** upon the death of a landowner. The surviving spouse or partner will not be entitled to participate in decision-making about the land but will be entitled to a lifetime right to income from the land as well as the right to occupy a family home on the land.
3. The Act now clarifies that the tikanga of the relevant iwi or hapū will determine whether **whāngai** are eligible to succeed to a land interest. Where the relevant tikanga does not recognise a relationship of descent, the court can give a whāngai the right to receive income or grants from the land right to occupy the family home.

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Nga waewae tapu - Topics related to targeted rates and user charges.

MAIHI

To work in partnership where the Crown and Māori achieve balance through a collaborative work programme that strengthens housing solutions for whānau.

Implement the MAIHI Framework for Action MAIHI drives a whole of system approach. It sets an expectation of cohesion across government agencies to accelerate Māori housing and wellbeing outcomes.

The MAIHI system approach has allowed us all to look across the breadth of government policies, programmes, and investment for housing. It has enabled us to create connections across the system between policies and programmes, but most importantly people. MAIHI is not just about what we deliver in the Māori housing sector – but how we deliver. Our new way of working has already brought about real benefits to recent and emerging issues – for example the Homelessness Action Plan taking a kaupapa Māori approach, placemaking development in Waingākau (Hastings) and an accelerated response to homelessness in Rotorua, working directly with Māori housing providers through cross agency collaboration within the system.

MAIHI has been successful in making gains towards changing the system to better deliver for Māori. That is why our new Māori Housing strategy takes MAIHI and elevates it to a position of greater importance and purpose.

MAIHI will not just be about changing how we deliver in Māori housing, but its principles and framework are what we will use to guide the strategic direction for Māori housing over the next 30 years.

Reset policies and processes Change policy settings to better deliver Māori-led local housing solutions in smaller regional centres. Policy settings and process are set to enable and support Māori-led local solutions in smaller regional centres – 2023/2024.

He Taupae Fund - To build the technical capability of Māori organisations who are contributing to increasing housing supply. (R & T Wainohu Whanau Trust). Review all funding levers available to Māori. Ensure Māori can access all funding levers across the system to increase housing supply, such as the Housing Acceleration Fund, Land for Housing, and Progressive Home Ownership. Ensuring legislation is fit for purpose, review the Māori Housing Act 1935 as a part of a wider legislation review.

The Government plans to repeal the Resource Management Act 1991 (RMA) and replace it with three new pieces of legislation. The RMA 1991 has not delivered on its desired environmental or development outcomes nor have RMA decisions consistently given effect to the principles of Te Tiriti o Waitangi/the Treaty of Waitangi. Current processes take too long, cost too much and will not address the many new challenges facing our environment and our communities.

The Napier Hastings Future Development Strategy once adopted will replace HPUDS.

The Heretaunga Plains Urban Development Strategy (HPUDS) is a joint strategy developed by Hastings District Council, Napier City Council and Hawke's Bay Regional Council to manage urban growth on the Heretaunga plains over a 30-year timeframe. The first version of HPUDS was adopted in 2010 and brought together separate urban development strategies that the relevant councils had in place.

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Nga waewae tapu - Topics related to targeted rates and user charges.

A reviewed version of HPUDS was re-adopted by the three councils in early 2017 (HPUDS 2017). The Napier Hastings Future Development Strategy once adopted will replace HPUDS.

Infrastructure availability will need to be monitored on an ongoing basis for both residential and business land, particularly water supply.

Influence of District Plan Changes on Capacity

Napier City Council is in the process of carrying out a full review of their operative District Plan and is aiming to notify a proposed District Plan in mid-2023. Hastings District Council has notified Plan Change 5 ('PC5') to the Hastings District Plan to enable greater intensification in urban areas. The hearings are scheduled for PC5 in early 2024. The analysis that has informed the zoning framework for the proposed Napier District Plan and PC5 will form the starting point for the intensification strategy to test for the FDS.

Both the Napier District Plan review and PC5 respond to the intensification directives of the NPSUD to enable increased development potential in urban areas. The proposed provisions, including new and updated district plan maps will be relevant to the development of the FDS, and a number of spatial features from these proposed maps have been considered below. Market Economics are currently working to provide updated figures for the plan enabled, feasible and Reasonably Expected to be Realised (RER) development capacity of the Napier PDP and the Hastings District Plan updated by PC5.

Two components of the Future Development Strategy.

1. *Evaluating the growth options,*

The FDS is to be developed in accordance with the requirements of the NPSUD and RMA. Part 2 of the RMA and the NPSUD include a variety of provisions relevant to Māori values and engagement. In particular, engagement with iwi and hapū is required to identify iwi and hapū values and aspirations for urban development, which will inform the development of the FDS.

2. *Statement of iwi and hapu aspirations for urban development*

Several potential Māori cultural opportunities and constraints including identified Māori Land, Areas of Cultural Significance, Marae, and Archaeological Sites. An indicative map and we are partnering with iwi groups to prepare the FDS and fully identify iwi and hapū values and aspirations for urban development and areas that may require protection.

A number of other topics discussed in this report address topics of particular relevance for iwi and hapū values including freshwater, indigenous biodiversity, and special landscapes and features.

The "protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna" is provided as a matter of national importance under s6(c) of the RMA. The Government has released the National Policy Statement for Indigenous Biodiversity that changes the requirements around what local authorities must do to maintain indigenous biodiversity.

This comes into effect on 4th August 2023 and the Councils are currently working through the implications for the FDS. The New Zealand Coastal Policy Statement also requires

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Nga waewae tapu - Topics related to targeted rates and user charges.

safeguarding the integrity, form, functioning and resilience of the coastal environment, and sustaining its ecosystems.

Key issues for the FDS in relation to natural environment will include:

- How to ensure urban growth occurs while protecting, and potentially enhancing, water quality, indigenous biodiversity, and outstanding landscapes.
- How to ensure urban development promotes positive effects and avoids adverse effects on water bodies, and freshwater ecosystems, and receiving environments.
- To what extent can development be accommodated in Significant Amenity Landscape Areas, Special Character Landscapes, and Coastal Landscape Character Areas while still protecting the identified landscape values.

Infrastructure

As the Napier and Hastings areas are experiencing significant growth there is a need to invest significantly in infrastructure to provide for the required development capacity. Infrastructure includes 3 Waters (drinking water, wastewater and stormwater), telecommunications, energy, transportation, parks and open spaces, and community facilities.

The role of infrastructure is to improve our social, economic, environmental and cultural well-being and support more sustainable and resilient outcomes. Ongoing growth in Hawke's Bay means that planning for future development capacity to be identified and serviced is a high priority. Further information is provided on three waters, transport, network utilities, and social infrastructure for both Napier and Hastings.

The housing assessment has identified limitations and information gaps around infrastructure capacity. In order to support more detailed and strategic planning for urban growth and development, consideration should be given to preparing a detailed infrastructure strategy for the Hawke's Bay region. Particular focus of this strategy should be on infrastructure planning, funding and the provision of infrastructure for the long-term. A scenario based modelling approach, using a variety of growth projections, is suggested.

It would be advisable to engage specialist engineers to work alongside planners to prepare this strategy in a way that will ensure it is meaningful and able to be used effectively in the future to inform infrastructure funding and planning decisions. The infrastructure strategy can also assist by informing any potential regulatory change required, and future LTP processes. Alongside the preparation of an infrastructure strategy, as a next step, the councils could look to explore and research other potential infrastructure funding and financing options, including any potential mechanisms to enable the efficient delivery of infrastructure to support growth.

Regulatory

The housing assessment findings and outcomes, alongside an FDS, should lead into a regulatory review and update to the Regional Policy Statement (RPS) and district plans. A detailed review of the operative planning provisions in the district plans should be undertaken, particularly before a full plan review in preparation of a combined plan under the RM reforms.

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This is to ensure the urban provisions are enabling growth, aligning with the requirements of the NPS-UD in terms of encouraging growth both up and out, and are not unnecessarily constraining development potential and opportunities.

If it is found that development potential is being constrained or that the provisions within the district plan could be more enabling, further investigation should be undertaken to what the options are to review and revise the necessary provisions and chapters in the district plan. In particular, a review should take place of the density provisions and other general provisions to ensure that they are providing for and encouraging a range of dwellings and typologies.

Key infrastructure issues for the FDS include:

- Significant investment is needed in three waters infrastructure to accommodate long term growth in both Napier and Hastings. How can growth be provided for in a way that ensures efficient provision of three waters infrastructure while operating within constraints of sustainable environmental limits?
- How can the long-term growth of the airport and port be managed in a way that avoids conflict and reverse sensitivity effects from urban growth?
- How can urban growth and transport provision be integrated to ensure high levels of accessibility by active and public transport, and to reduce vehicle kilometres travelled (VKT) and carbon emissions?
- Is access to and availability of social infrastructure suitable to accommodate for additional growth particularly intensification?
- Resilience via suitable access should be a key consideration for the growth options.

The next step will be to refine this initial thinking and develop the spatial scenarios based on the opportunities and constraints analysis undertaken so far.

The purpose of this is to set out a range of options that cover the full spectrum of growth management approaches in Napier and Hastings.

Nga mihi nui na Marcel P Wainohu

R&T Wainohu Whanau Trust – Chairperson

Ko tatou nga kanohi me nga waha korero o ratou ma kua ngaro ki te po.
Ko te tapu te mana o nga kawai tipuna.

Changing how we set rates and user charges, through our Revenue and Financing Policy

Anna Lorck**Constituency:** Heretaunga-Hastings**Type of property/ies:** Lifestyle

1. Do you support the proposed move from LV to CV for the general rate? **No**

Lack of evidence provided to HBRC ratepayers that the switch will be more equitable, fairer and stable. Use of an excuse that council is only doing what the majority of other councils do as the reason to justify as beneficial to ratepayers. No proof that those who are facing increases from the switch are more financially capable of paying more. Poor consultation process that misleads the public over the "slicing" and size of pie as a reason for a two step process that provides an assurance that the council is not taking more rates, when it intends in the second step to seek more funding for its future annual and long-term plans. Misleading the public on an eight-week consultation period, when the council did not from the outset ensure all ratepayers received sufficient information to take part in the submission process. Incorporating this significant switch plan into a list of other proposals that dilutes the public's ability to understand the full impact. No ability for the public to ask questions of elected officials with no public meetings. Selecting to only write to 1077 ratepayers and not provide all ratepayers with a fair and equitable opportunity to respond. No signal to the public that this was coming - even though the council has been working on it for 18 months. Putting more pressure on access to affordable homes, when this is one of the greatest issues facing the region. Putting more pressure on home owners with fixed incomes, and also putting increased pressure on rents going up. No information on the level of direct benefit increase to those who will pay more when the council doesn't provide services to homes.

2. Do you support the regional economic development rate proposal? -

3. Do you support the flood protection and drainage schemes proposal? -

4. Do you support the passenger transport rate proposal? -

5. Do you support the freshwater science charges and new targeted rate proposal? -

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

7. Do you support the additional policies for rates remission and postponement? -

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Brent Linn on behalf of Hawke's Bay Winegrowers**Constituency:** Not sure**Type of property/ies:** Rural

1. Do you support the proposed move from LV to CV for the general rate? **No**

2. Do you support the regional economic development rate proposal? **No**

We are particularly concerned about the transfer of costs associated with the Regional economic development, passenger transport and sustainable land management components of the proposal. These are costs that many of our members will struggle to find as equitable based on their analysis of the benefits to their businesses.

3. Do you support the flood protection and drainage schemes proposal? **No**

4. Do you support the passenger transport rate proposal? **No**

We are particularly concerned about the transfer of costs associated with the Regional economic development, passenger transport and sustainable land management components of the proposal. These are costs that many of our members will struggle to find as equitable based on their analysis of the benefits to their businesses.

5. Do you support the freshwater science charges and new targeted rate proposal? **No**

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **No**

We are particularly concerned about the transfer of costs associated with the Regional economic development, passenger transport and sustainable land management components of the proposal. These

are costs that many of our members will struggle to find as equitable based on their analysis of the benefits to their businesses.

7. Do you support the additional policies for rates remission and postponement? Yes

While we acknowledge the rates remission on the grounds of hardship policy, we consider this to be a “band-aid” solution instead of HBRC addressing the need for the transfer of costs to the horticulture sector this proposal predicates.

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? [as attachment]

Thank you for the opportunity to submit on the HBRC proposal on how you set rates. HBWG represents the interests of the Hawke’s Bay wine industry. We write to voice our concern over your Council’s proposal to change the way you set rates. The proposal as presented will significantly financially disadvantage the majority of our members at a time where they are facing significant economic headwinds, rebuilding their businesses following the impacts of Cyclone Gabrielle. While we acknowledge the rates remission on the grounds of hardship policy, we consider this to be a “band-aid” solution instead of HBRC addressing the need for the transfer of costs to the horticulture sector this proposal predicates. We are particularly concerned about the transfer of costs associated with the Regional economic development, passenger transport and sustainable land management components of the proposal. These are costs that many of our members will struggle to find as equitable based on their analysis of the benefits to their businesses.

Submitter ID: 532

Hearing? No

Beverley May-Smith

Constituency: Heretaunga-Hastings

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? No

In my view the Hawkes Bay Regional Council has an obligation to look after everyone in our community including the vulnerable. It should not be implementing policies that worsens anyone’s chances of gaining access to affordable housing or increases their rate bill unnecessarily which is what the proposed changed to Capital Value Rates will do. This submission discusses:

- Adverse effects on housing affordability
- Harms to equality
- Economist’s support for Land Value Rates

Housing Affordability: Housing is increasingly unaffordable in Hawkes Bay. Inflation adjusted rents have gone up 60% in Napier and Hastings over the last decade, and wages have not grown accordingly. More houses need to be built to drive down prices, but the propose move to capital value will do the exact opposite by punishing people who build houses and rewarding land bankers. We need to prioritise housing affordability, for all the renters and first home buyers who are struggling at the moment. This means sticking to the current state of Land Value Rates. Switch to Capital Value Rates: When choosing rating policy, the regional council should aim to keep rates affordable for low-and middle-income residents and ensure the wealthiest are paying their fair share. The council’s own consultation documents show that if the general rate is switched to capital value, the average resident rate bill will go up by 1-16% depending on the region, without council revenue going up accordingly. This is a significant downside of the capital value system, personally I prefer that the council sticks to land value which results in lower rates for average Hawkes Bay residents. New Zealand Economist Say Land Value Rates Is Better: Many prominent New Zealand economist across the political spectrum eg Professor Arthur Grimes at VUW and Dr Eric Crampton from the NZ initiative say that the Land Valve Rates is the best choice for a rating system. In 2020, the Chief Economist for Auckland City Council, wrote a report, arguing in favour of Land Value Rates and Wellington City Council is possibly going to switch from Capital Value to Land Value Rates next year. They give many of the same reasons as I have, such as inequality, increased housing supply and a more vibrant city. To conclude, I think it’s really important to keep rates low for low-and middle-income families, while still being able to fund important council services. The proposed from land value to capital value would raise rates on the average household without providing any extra funding for the council. That’s not a fair system. I sincerely hope the council will not go through in changing the rate system.

2. Do you support the regional economic development rate proposal? -

3. Do you support the flood protection and drainage schemes proposal? -
4. Do you support the passenger transport rate proposal? -
5. Do you support the freshwater science charges and new targeted rate proposal? -
6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -
7. Do you support the additional policies for rates remission and postponement? -
8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 533

Hearing? No

Lesley D Redgrave

Constituency: Heretaunga-Hastings

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? **No**

I Wish to add my voice to the many others objecting to the proposed financing plan, changing from Land value to Capital value.. I am sure. Fellow submitters have covered the spectrum of the many good reasons the current LV assessment is fair and transparent and does not need to be change to a system that does not guarantee this. At a time when so many are facing uncertainty and financial burden due to the Cyclone and other health and economic difficulty, this proposal to change to a capital Value assessment just adds more fear and uncertainty of having even higher rates. As it is ,there has been no break to the spiraling Regional rate rises since HBRC started producing their own bills, rather than being billed through the local council system (The whole creation of which would have cost the unsuspecting ratepayer a significant rate rise in itself) And now we read that the establishment of this proposed new system is estimated to lead to an 11% rate rise alone (An looking at the performance of many project this council has undertake, we take estimates with a grain of salt} We note this rise would be ontop of any general rise ,which I have said previously, have spiraled in the past years I can assure you there is a great deal of dissatisfaction and a general feeling of hopelessness and betrayal that rates are galloping like they are, adding to the fear they will continue to do so unabated; being totally out of touch with the circumstances of a large percentage of ratepayers Fear also of cyclone recovery costs and government buyout and flood control requirements being added without any means of being involved in any of the decision making along the way. Disatisfaction of the Regional Council performance, especially in the Cyclone Response Suspicion that this proposed move is not just a cynically dressed up tax rates rise whose aim is to not make things fairer and transparent but to increase the regional Councils revenue and control In short, there is very little trust in the Regional Council at present and no trust in such a scheme. Whilst there are some who would pay less , under this proposed scheme, they still have the negative expense of revaluation, appeal and the cost of establishment. Certainly the resources involved in dealing with all the appeals would be significant and ongoing, (no doubt adding even more staff , beauracracy and cost) The revaluation process is fraught, how, or why can a 900K 3 bedroom, one toilet, one garage be deemed to use more Council resources and pay more rates that a little less flash but similar 3,bed. One bath and garage valued at\$500K ? And the same situation that we have under LV is present with similarly priced properties attracting the same rate, takes no account of the amount of Council services.. if it is deemed unfair now, it should be seen as unfair under the proposed scheme. As for Commercial Properties, so often these are subjective valuations not having similar operations/ structures nearby to compare/ adequately assess a property. Being very mindful on the impact on industry ..especially after all the blows of Covid and the Cyclone.. Industry which is the lifeblood of this region and must be protected, not taxed further. I propose the Regional Council stay with the existing system (although I appreciate some sectors are already as assessed on CV).. This will also ensure transparency about the true rates rise , being able to compare apples with apples.. This will engender badly needed trust...although possible accompanied by a clear demand the Council continue to assess its spending and efficiency in all areas of its operation in an attempt to keep and rise to the minimum.. Wouldn't it be great to have a zero rates rise, with our Council spending within its budget, becoming more innovative on a set budget and not have the imperative (has it the mandate evn?) to grow..Hawkes Bay can grow, there is no need for its Regional Council too..More, more,more is what climate change is about.

2. Do you support the regional economic development rate proposal? -
3. Do you support the flood protection and drainage schemes proposal? -
4. Do you support the passenger transport rate proposal? -
5. Do you support the freshwater science charges and new targeted rate proposal? -
6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -
7. Do you support the additional policies for rates remission and postponement? -
8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 534

Hearing? No

Melanie and Peter Lang

Constituency: Ahuriri-Napier

Type of property/ies:

1. Do you support the proposed move from LV to CV for the general rate? **No**

We strongly disagree with the proposed change to the way the rates will be calculated from Land Value to Capital Value. While we live on a lifestyle block we do not gain any income from our land, neither do most of our neighbours. We get very little for the rates that we currently pay as we are paying for all the services on top of our usual rates and everything is on the increase. From what we can see some pastoral and forestry properties will have a decrease (income earning) while our properties could have quite a large increase. Please take this into account and reconsider.

2. Do you support the regional economic development rate proposal? -
3. Do you support the flood protection and drainage schemes proposal? -
4. Do you support the passenger transport rate proposal? -
5. Do you support the freshwater science charges and new targeted rate proposal? -
6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -
7. Do you support the additional policies for rates remission and postponement? -
8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 535

Hearing? No

John Loughlin on behalf of Askerne Estate Winery Limited

Constituency: Heretaunga-Hastings

Type of property/ies: Rural

1. Do you support the proposed move from LV to CV for the general rate? **No**

Valuation of improvements is much more judgmental and prone to error.

2. Do you support the regional economic development rate proposal? **No**

Businesses are also major contributors to economic development and community incomes.

3. Do you support the flood protection and drainage schemes proposal? **Yes**

This is extremely important work.

4. Do you support the passenger transport rate proposal? **No**

People outside the urban areas get no benefits. Urban should pay.

5. Do you support the freshwater science charges and new targeted rate proposal? **Yes**

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **No**

I do my own biodiversity management and dealing with pests.

7. Do you support the additional policies for rates remission and postponement? **Yes**

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? The profitability of horticultural and viticultural businesses has fallen dramatically in recent years as costs have risen much faster than incomes.

Fiona Y S Dick

Constituency: Heretaunga-Hastings

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? **No**

Why? I believe your mandate is to 'promote the sustainable management of natural and physical resources' ie to look after the environment under the RMA, the land and water resources. (Capital Value is not Market Value.) I do NOT support the proposed changes.

2. Do you support the regional economic development rate proposal? -

3. Do you support the flood protection and drainage schemes proposal? -

4. Do you support the passenger transport rate proposal? -

5. Do you support the freshwater science charges and new targeted rate proposal? -

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

7. Do you support the additional policies for rates remission and postponement? -

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Richard A Punter on behalf of The WhiteBridge Trust

Constituency: Heretaunga-Hastings

Type of property/ies:

1. Do you support the proposed move from LV to CV for the general rate? -

2. Do you support the regional economic development rate proposal? -

3. Do you support the flood protection and drainage schemes proposal? -

4. Do you support the passenger transport rate proposal? -

5. Do you support the freshwater science charges and new targeted rate proposal? -

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

7. Do you support the additional policies for rates remission and postponement? -

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? I

am emphatically opposed to the latest HBRC Regional Rates concept. This is the second attack on HBRC small growers and lifestyle block owners in as many months.

- Firstly in December HBRC advised me that you will be reducing my water take after I had spent many thousands of dollars in fees and compliance work, and,
- according to the model provided by HBRC you intend to increase my regional rates by 42% You also insult me with your defamatory accusation that I am an “exacerbator” (Page 8 of your slideshow) . Clearly the manager who chose that word was being deliberately offensive since an exacerbator is an evil or violent thing that makes a bad situation even worse. I will be interested to see your proof of that. There is no doubt that your rates plan when coupled with the irrigation reductions has a perverse and insidious logic to it.

- Reduce or cancel irrigation water takes, land is no longer so productive – if at all

- Land Values fall over time,

- Rates income falls as land values fall.

- Change rating concept to include all capital improvements

- rateable values vastly increase

- Rates Incomes recovers. Your claim, that this is more equitable, applies to whom? If I cannot irrigate, then my land is no longer “Plains Production Land”. The idea, that by adding the value of a residence and sheds to the rateable value, using the utterly facile and specious argument that these assets and improvements will enable me to, “earn income from my house and shed ” is exactly that, facile and specious. I don't need a house and workshop on the block to improve horticultural outcomes. I need a bore and an irrigation water consent, which you are planning to remove. Your plan to move pest control from targeted to general rates is not equitable, you give Forestry a free ride on capital value because due to an

“accounting anomaly” “trees are worth nothing” but you expect the rest of us to pay their pest control costs? I control the pests on my property, tell me why I have to pay for forestry pest control. Your timing of both the water and rates issues was quite deliberate, dump both onto us at Xmas and sneak it through, claiming there was no opposition. You must have been planning this for several years but this is the first we hear of what is a pre-emptive strike against small growers, still trying to recover from Gabrielle. Any properly managed organisation in this financial environment would be very publicly explaining how they were looking to reduce the cost base, turning every cost centre inside out, rigorously justifying every cent spent, slashing contractor and consultant fees, but no, from HBRC silence. Mainly, I suspect because you have no competencies in that area. HBRC has sadly become a cloth-eared, unaccountable, autocracy. In the middle of a cost of living crisis my increase of 42% (from your chart) gets me precisely what? Nothing. Is it equitable? Don't be ridiculous.

Submitter ID: 538

Hearing? No

Dave Martin

Constituency: Wairoa

Type of property/ies: Rural

1. Do you support the proposed move from LV to CV for the general rate? Yes

It better reflects that the smaller size of urban and lifestyle units don't reflect where the true value is in a rateable asset is when taken as a land only value. Yes this change is advantageous to pastoral farms, but we actually still pay, per rateable unit, the largest individual rates compared to urban and lifestyle.

2. Do you support the regional economic development rate proposal? No

I note HBRC are looking to shift a larger share of this rate on to the rural communities. I believe this is an unfair and illogical move and I do not support this change. Rural rate payers do not, as a majority, receive any benefit from tourism- especially Wairoa rate payers. This should be a targeted rate to those businesses/locations where tourism is of the greatest benefit. I would go further to say in the current economic climate and recovery spending, the HBRC needs to cut its cloth to maximise the recovery of the region. The HBRC should only be involved in its core functions- tourism isn't one, leave this to the City and District councils. Every dollar spent by the HBRC needs to be used in the most financially efficient way as possible to aid in the environmental recovery. This being said, the method of recovery with the highest environmental standard might not always be the best spend. Sometimes methods that don't quite meet the highest environmental standards might be the best method financially to reach a recovery target sooner, when dealing with situations from extreme weather events such as the Cyclone.

3. Do you support the flood protection and drainage schemes proposal? -

4. Do you support the passenger transport rate proposal? -

5. Do you support the freshwater science charges and new targeted rate proposal? No

Most freshwater regulation costs will continue to be paid for by general rates, but it is proposed to target 20% of the cost to rural properties, with the balance funded by s.36 charges. Farmers by default will be forced to pay higher freshwater regulations charges as the National Freshwater Standards Policy is introduced in 2025, why force them to pay twice? Urban freshwater virtually all ends up as stormwater- little care is shown by those whose water is not collected at source in tanks or make efforts to naturally filter rainwater runoff, yet rural ratepayers are constantly drilled about their perceived effects on freshwater.

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

7. Do you support the additional policies for rates remission and postponement? -

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?

Overall I applaud the HBRC for sitting down and reflecting on where rates need to be charged to. A lot of the old thinking needed to be cast aside and a fresh perspective used to view the changes on why and how spending is allocated. A good example is the pest control rate. No longer is it about the control of possums to reduce the spread of TB- that is now Ospri's role. Controlling possums to enhance the biodiversity of the region is definitely an issue for the HBRC- something every rate payer is responsible for.

Heather Black**Constituency:** Heretaunga-Hastings**Type of property/ies:**

1. Do you support the proposed move from LV to CV for the general rate? -

Planning for public transport cost increases is not something that happens as a surprise. We question why the amount is so big, so suddenly. Going from 0.00 to 414.10 in one year does not seem reasonable. The same goes for the other major increase on the specified item of Karamu tributaries. To go from 0.00 to 393.12 does not seem reasonable. When you take into account the increase in general rate from 299.01 to 962.61, on top of the above two specified items, we will undergo an increase of around 350% in one year.

2. Do you support the regional economic development rate proposal? -

3. Do you support the flood protection and drainage schemes proposal? -

The same goes for the other major increase on the specified item of Karamu tributaries. To go from 0.00 to 393.12 does not seem reasonable.

4. Do you support the passenger transport rate proposal? -

Planning for public transport cost increases is not something that happens as a surprise. We question why the amount is so big, so suddenly. Going from 0.00 to 414.10 in one year does not seem reasonable.

5. Do you support the freshwater science charges and new targeted rate proposal? -

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

7. Do you support the additional policies for rates remission and postponement? -

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? No other company would reasonably expect to make such increases and have their consumers afford that increase or stay with that provider. We don't believe the council should operate any differently. Advanced warning of confirmed cost increases (1-2 years when the items planned are within the council's control e.g. public transport) should be given and a stepped increase that is capped at 100% increase YOY (year on year) should be in place. We believe an increase of 350% in one year is neither fair, nor reasonable.

Penny Reynolds on behalf of Washpool Station Limited**Constituency:** Heretaunga-Hastings**Type of property/ies:** Rural

*1. Do you support the proposed move from LV to CV for the general rate? **Yes***

We support this change. As a rural largely drystock farm, we feel we have been paying more than our fair share of general rates for ever. The little benefit we received from HBRC services is disproportionate to the rate burden we pay. For transparency, we would like council to carefully consider benefits we do receive and review our rates accordingly. The proposed move from land value to capital value is a step in the right direction.

*2. Do you support the regional economic development rate proposal? **No***

We oppose pastoral farms being included as a 'user category' for this rate. Pastoral farms are not direct beneficiaries of modern amenities and services as expressed in the policy document. Our farm for example is adjacent to two wineries who are routinely visited by tourists. In contrast, we are never visited by tourists only by family and friends who are not an income source. I fail to see how our farm would benefit from this rate. The consultation document states 'we consider that the average increase for these types of ratepayers is reasonable as it is a small percentage increase on their total rates, and they directly benefit from this activity'. I have two issues with this statement. Firstly, to justify a rate increase on the basis that 'its a small percentage on their total rates' lacks transparency and any appreciation of the ratepayers total rate burden and the ongoing rate increases of recent years. Secondly, to state that 'they directly benefit from this activity' is not only wrong but unfair. With respect to rural farm businesses, we feel this rate

should be much more targeted with Council identifying the actual benefits gained due to this rate. Again, the Council's stated desired outcome is transparency and fairness.

3. *Do you support the flood protection and drainage schemes proposal?* -

4. *Do you support the passenger transport rate proposal?* -

5. *Do you support the freshwater science charges and new targeted rate proposal?* -

6. *Do you support the sustainable land management and biodiversity/biosecurity proposal?* -

7. *Do you support the additional policies for rates remission and postponement?* -

8. *Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?* We

would like to thank HBRC for the opportunity to submit on the Revenue and Financial Policy Review and in particular the expressed desire for transparency and fairness. Regarding the remaining rate proposals; we endorse the submission by Federated Farmers of New Zealand Inc. Thank you for the opportunity to make this submission. Our annual rates are a significant fixed cost for our business and are all payable, come rain or shine, regardless of an unpredictable agricultural income. We hope the HBRC will also embark on an expenditure review of all its activities to ensure it is an efficient and effective user of hard earned ratepayer funds. As we are in agreement with Federated Farmers on all the proposed changes, we are happy to be represented by them at the hearing.

Submitter ID: 541

Hearing? No

Nuku Hadfield on behalf of Guardians of the Ruakituri

Constituency: Wairoa

Type of property/ies: Rural

1. *Do you support the proposed move from LV to CV for the general rate?* **Yes**

Using Capital Value to calculate rates is the fairest system as Capital investment best reflects how intensely utilised the land is. This indicates a highly likelihood of use of council resources and services and a greater ability to generate income and therefore contribute more for these services.

2. *Do you support the regional economic development rate proposal?* **Yes**

As commercial/industrial are the biggest beneficiaries from this service it seems fair that there is a differential of x3. Other ratepayers across the region have indirect benefit so should contribute in a small way.

3. *Do you support the flood protection and drainage schemes proposal?* **Yes**

The current system is very complex and the proposal appears to simplify this. Using the User pays principle - those who benefit most (who live along the rivers with higher levels of flood protection and drainage schemes should pay the most). We all benefit from and expect to see well-maintained rivers and streams, the cost of this should be shared cross ratepayers in a small way.

4. *Do you support the passenger transport rate proposal?* **Yes**

Those that are unable to access this service should not be contributing to the cost of running it. We support this continuing as 100% targeted rate.

5. *Do you support the freshwater science charges and new targeted rate proposal?* **Don't know**

Yes and No Retaining this as LV ensures that owners of landowners are contributing to the science and monitoring. The question about how much monitoring is done outside the consenting process is a different one. Could we review the purpose of the monitoring, to ensure there is a reason to do it; not just monitoring for the sake of monitoring. Reducing the portion of sec36 charges from 35% to 15% doesn't make sense if the action the consent is required for, is creating the need for the monitoring. User pays should still apply as a guiding principle.

6. *Do you support the sustainable land management and biodiversity/biosecurity proposal?* **Yes**

The whole community is responsible for our environment and biodiversity, sharing the burden of cost across all ratepayers is a fairer distribution rather than just a small sector of the community. It is also a way for residential ratepayers to contribute in a small way to these important obligations, keeping in mind that

rural land owners use large amounts of their own funds to do the work required in reducing erosion, retiring land from their business and taking positive actions to improve water quality.

7. Do you support the additional policies for rates remission and postponement? **Yes**

Those owners who are experiencing hardship due to damage caused from adverse weather events or temporary hardship because of the balancing of costs into CV may need support with these shifting costs in this difficult high cost of living environment. It seems fair that they could be able to access a reprieve on an individual application. Changing the wording in the policy to better reflect modern postal systems is an obvious move

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? The Guardians of the Ruakituri is a catchment group with farming membership from the entire Ruakituri Valley, Wairoa. Collectively we own and pay rates on 63,000ha of land

Submitter ID: 542

Hearing? No

Diana Hollis

Constituency: Tamatea-Central Hawke's Bay

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? **No**

Not really because my rates are going to be higher, Central Hawke's Bay people already pay huge rates to the Council for our area which are going to increase over the next few years. They are never going to come down. I don't know how people are supposed to cope with all this. Pastoral rates are coming down, and they are the very reason we are having these weather events which are only going to get worse because of the green house gases they create.

2. Do you support the regional economic development rate proposal? **Yes**

3. Do you support the flood protection and drainage schemes proposal? **Yes**

4. Do you support the passenger transport rate proposal? -

Does not count in CHB

5. Do you support the freshwater science charges and new targeted rate proposal? **Yes**

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Yes**

7. Do you support the additional policies for rates remission and postponement? **Don't know**

Not sure about this as a bill is a bill and at the end of the day it has to be paid. If its written off someone else will have to pay eventually. The water barons in CHB should be paying their debt of the water rights to the HBRC. This is another reason it angers me, my rates go up and they get off paying their debt. What is right about that?

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 543

Hearing? No

Gary Jones on behalf of Mr Apple

Constituency: Heretaunga-Hastings

Type of property/ies: Commercial/Industrial

1. Do you support the proposed move from LV to CV for the general rate? -

More equitable: The assumption that capital value relates to an "ability to pay" is inconsistent with the fundamental principle of equity. Equity relates to use and access to a service and the HBRC has not provided a persuasive argument that this modal is equitable. More stable: Capital values of horticultural properties fluctuate and the impacts of the cyclone, cost increases, and changes in global trade conditions will all result in downward pressures. There is no agreed way of evaluating the value of PVR protected varieties. Many will not be successful in the long-term despite some short-term success. Fairer: From a horticultural orchard perspective the modal of "exacerbator-pays" is a poor fit. Modern orchards enhance their ecosystems. Takes and discharges are monitored and attract fees. International environmental

assurance systems must be independently audited to meet global supply-chain requirements. These meet New Zealand and international regulatory requirements, but regional Governments are slow to accept them. With a cost of \$2000 per orchard it would be well received to have HBRC recognise and reward the robustness of these assurance systems.

2. Do you support the regional economic development rate proposal? -

It is hard to see how export horticultural industries will benefit from regional economic development rates, in particular funding Hawke's Bay Tourism. The Regional Economic Development Agency (REDA) is yet to provide an operational plan for Matariki but its goals are foundational in people and community rather than aspirational for business.

3. Do you support the flood protection and drainage schemes proposal? -

4. Do you support the passenger transport rate proposal? -

The new rating map proposed covers large areas that are un-serviced. From a horticultural perspective employers are already asked by MSD to provide transport to workers as public transport does not service these businesses.

5. Do you support the freshwater science charges and new targeted rate proposal? -

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

7. Do you support the additional policies for rates remission and postponement? -

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?

HBRC should allow more time for public discussion and not undertake the consultation over the holiday period. With the impact of cyclone Gabrielle on Hawke's Bay this is not the right time to impose higher rates on horticultural operators.

Submitter ID: 544

Hearing? No

Humprey Symons

Constituency: Heretaunga-Hastings

Type of property/ies: Residential

1. Do you support the proposed move from LV to CV for the general rate? -

2. Do you support the regional economic development rate proposal? -

3. Do you support the flood protection and drainage schemes proposal? -

4. Do you support the passenger transport rate proposal? -

5. Do you support the freshwater science charges and new targeted rate proposal? -

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

7. Do you support the additional policies for rates remission and postponement? -

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?

I disagree with proposal to change rating system.

1) People over 70 on fixed income will not be able to meet anymore big increase are struggling now.

2) People who are renting will not be able to pay large rent increases as their income won't be increased to cover so many extra cost

3) Council should not be looking at doing any new projects instead of fixing infrastructure which has not been maintained properly over the years.

4) Brookfields Bridge should be replaced with a new one the cost won't get any less than now and govt is putting up most of the money. Anyway dangerous not to have another way in & out of Napier incase of another natural disaster

Submitter ID: 545

Hearing? No

Sarah Brun

Constituency: Tamatea-Central Hawke's Bay

Type of property/ies: Lifestyle

1. Do you support the proposed move from LV to CV for the general rate? No

Regional Council is environment and land focussed - it makes complete sense to have rates based on LV versus CV.

CHB ratepayers being especially impacted by this change (47% per your consultation doc) given the differences in LV and CV - a lot of first time home buyers or young families who have purchased land and put a transportable home or new build. This doesn't make us any more able to contribute higher rates than someone in Havelock North that has a much closer aligned LV and CV for their property.

It makes no sense to me that pastoral farmers are the winners out of this, and urban/lifestyle are the losers. Farmers (by default) are the ones contributing more negatively to the environment and waterways etc due to what they do with their land. We have a 10acre lifestyle property with no stock, bore, waterways. We have rainwater tanks, cut the grass for hay only and have invested in our own wetland area and native planting. It seems ludicrous we are going to get punished for that out of proportion to a farm down the road actively doing the opposite. Also penalising those who have increased the CV of their home via renovations or improvements versus pastoral farmers again makes no sense in the context of a regional council rate and what you are focussed on.

Hawke's Bay is not the right make up for this to make sense and be fair. Alongside some huge financial increases to local district council rates and on top of the cyclone impacts that has impacted businesses and jobs - this seems the complete wrong timing to be considering this. Do not support this change.

2. Do you support the regional economic development rate proposal? Yes

Agree in principle to broaden the rate out to wineries, orchards etc. A lot of the effort and work in this area directly benefits them / their workforces. Agree also to keep this a targeted rate versus basing on CV.

3. Do you support the flood protection and drainage schemes proposal? No

Again, due to changing to a CV rate versus LV - feel we are going to wear the brunt of this which is not proportionate to the benefit. Seems unfair. Why not a targeted fixed rate?

4. Do you support the passenger transport rate proposal? Yes

Not directly impacted, but agree with extension of rating area based on development, this makes sense. Still not sold on fairness of a LV to CV argument for this either.

5. Do you support the freshwater science charges and new targeted rate proposal? Don't know

I found this confusing and hard to work through in the document.

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? No

Don't agree with move to CV from LV and non-rural ratepayers contributing more to this - when they already will be contributing more to district rate increases that many of the rural properties do not, and do not impact these targeted areas as much with their properties.

7. Do you support the additional policies for rates remission and postponement? Yes

Agree with commentary in consultation document.

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? No

Submitter ID: 546

Hearing? No

Hugh Ritchie on behalf of Water Holding HB

Constituency:

Type of property/ies:

1. Do you support the proposed move from LV to CV for the general rate? -

2. Do you support the regional economic development rate proposal? -

3. Do you support the flood protection and drainage schemes proposal? -

4. Do you support the passenger transport rate proposal? -

5. Do you support the freshwater science charges and new targeted rate proposal? -

Water Holdings Hawkes Bay (WHHB) wish to make a submission on the LTP with the main area of concern being science charges for water take consents.

Water Holdings is the current owner of the residual assets of the RWSS these assets centre around consents to store up to 100 million m³ of water for release for environmental and consumptive use. This project has been stalled by the legal impediment of the status of relevant land managed under the Conservation Act 1987 and hence the legal impediment has also stalled the ability to action the consents to which science charges are being applied. The rationale behind section 36 science charges is to enable the effects of consented activities to be monitored and any effects understood and if needed additional controls introduced. It is therefore very hard to see how consents that are not being actioned can have any effect and with no effect what is there to be monitored.

Water Holdings HB does not support water allocations being tied up in unexercised consents and supports the use it or lose approach. There could be an argument that Section 36 charges on unimplemented consents is a further driver to give effect to consents issued. However, I would again reinforce the point that Water Holdings is currently prevented from actioning its consents for legal reasons beyond its control, so that rationale does not apply.

In terms of the mandatory criteria under section 36AAA(3) of the RMA:

- while there remains a legal impediment to giving effect to its consents, WHHB receives no benefit from the monitoring to which the charges relate as distinct from the community as a whole.
- while there remains a legal impediment to giving effect to its consents, the need for HBRC's actions to which the charge relates do not arise from the actions of WHHB; and
- most relevantly which regard to science charges, while there remains a legal impediment to giving effect to its consents, the monitoring cannot relate to the likely effects on the environment of WHHB's activities and/or the benefit to WHHB of the monitoring to which the charges relate cannot exceed the likely benefit of the monitoring to the community as a whole.

In the circumstances, it is WHHB's position that none of the statutory criteria for imposing a science monitoring charge on it apply, and any such charges fixed through the LTP would be of doubtful validity or legally unreasonable.

The second area of concern has been the methodology used to set the charges. The charges have risen from 48k to close to 200k in 4 years – noting that the overall fees and charges the Council levies have doubled over the same period. Noting the statutory criteria referred to above, not only the basis for but the hugely increased level of charges imposed is manifestly unreasonable and disproportionate.

As a holder of water consents in my own business there has not been anywhere near the increase and we actually use the consents - so there is a basis for monitoring and some thing to monitor. The tiered nature of the charging system does not seem to provide a particularly fair outcome for all consent holders. Small users might have a small effect but their cumulative effect is large. It could be argued that it would actually cost more to manage the effects of small takes in terms of site visits and data collection from many sites to work up the effects. This system has large takes not only paying more due to volume but also due to rate and so as the largest consent we get the largest bill on both theoretical volume and rate, while having no effect at all due to the legal impediment preventing the consents from being given effect to. I would also contend that as the science is being done on a catchment basis and not an individual take basis then the total amount required by council for the monitoring should be pro-rata across all consents as every litre used has the same effect.

HBRC has published its own report around water demand into the future and the main message is that there is not enough currently and that only gets worse going forward. We would contend that the shortfall is understated if you were to include environmental flow requirements and if you also wanted to have a growth strategy for the Province. One would think then that HBRC would be doing everything in its power to address this shortfall and work with and support projects trying to address this current and growing problem. As we write this submission Napier and Hastings are on level 2 restrictions. Continued cutting and dividing the existing takes will eventually put at risk our biggest economic driver due to lack of reliable water supply.

In summary the position of WHHB is that legally impeded consents should not be subject to S36 charges due to the lack of any effect and the lack of any benefit to WHHB as distinct from the community as a whole. Secondly the methodology used to calculate the S36 charges needs to be fair, transparent and equitable which, based on our experience to date, they have not been. On both grounds, imposing further charges on WHHB would be both legally inappropriate, unjustified and unreasonable. Finally, the council and the community need catchment solutions for water security and so should be encouraging actions that could help deliver solutions..

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

7. Do you support the additional policies for rates remission and postponement? -

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 547 LATE

Hearing? No

Jen Cashmore

Constituency:

Type of property/ies:

1. Do you support the proposed move from LV to CV for the general rate? **No**

I'm strongly opposed, it is not fair to charge us by going off over inflated residential land value and especially not house value (with what you purpose).

Why do those residents who all equally benefit from regional works have to pay more just because land and house is more over inflated than another, we all equally benefit, it should just be a reasonable flat rate for everyone. Be fair your system isn't.

2. Do you support the regional economic development rate proposal? -

3. Do you support the flood protection and drainage schemes proposal? -

4. Do you support the passenger transport rate proposal? -

5. Do you support the freshwater science charges and new targeted rate proposal? -

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

7. Do you support the additional policies for rates remission and postponement? -

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

Submitter ID: 548 LATE

Hearing? No

Bill Buddo

Constituency: Ngaruroro/Wairoa

Type of property/ies: Rural

1. Do you support the proposed move from LV to CV for the general rate? **Yes**

2. Do you support the regional economic development rate proposal? -

3. Do you support the flood protection and drainage schemes proposal? **Yes**

I support the move to capital rating system, as we as pastoral farmers have been historically overpaying for the work the regional council does in flood protection. Our land is unimproved, and as such if flooded, does not cost us much. In comparison, someone who has invested in the land (bigger capital value), has much more to lose if the regional council is unable to protect their land. Therefore, capital value is a better measure of benefit from regional council work, and rating on this basis is fairer.

4. Do you support the passenger transport rate proposal? -

5. Do you support the freshwater science charges and new targeted rate proposal? -

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? **Yes**

I also support the new land management and biodiversity/security proposal. The whole region benefits from the work done in this space, and we on our farm spend much time on pest control. As such, we don't need the regional council support in this space, but recognise that TB control and biodiversity is important across the region, not just on individual properties. Perhaps a higher differential could be considered for those properties who most benefit.

7. Do you support the additional policies for rates remission and postponement? -

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy?

Finally, my family and I have been farming my property in Poukawa for over 100 years. When Pakeha arrived and started farming this land, it was already lacking in native forest. I have never had to clear scrub on this land, and we have very little in the way of remaining native vegetation. Only a few flax bushes on cliffs in the hills and some cabbage trees. In comparison, my property in Wairoa has large tracts of remnant native flora. When I fence a paddock or waterway there, native vegetation regrows very quickly with no planting needing to be done. This is not the case in Poukawa. Here we have planted much of our waterways (nearly all on the farm), not because we have to (TANK is not compelling us to yet), but because it is the sensible thing to do. However, only weeds grow on the fenced stream banks here, as there are no seeds in the ground to start native flora growing. This makes the support of the regional council critical to revegetating any land in this area where it does not impede water flow.

Submitter ID: 549

Hearing? Yes

Nigel Bickle on behalf of Hastings District Council

Constituency: Heretaunga-Hastings

Type of property/ies: Other

1. Do you support the proposed move from LV to CV for the general rate? -

2. Do you support the regional economic development rate proposal? -

3. Do you support the flood protection and drainage schemes proposal? -

4. Do you support the passenger transport rate proposal? -

5. Do you support the freshwater science charges and new targeted rate proposal? -

6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -

7. Do you support the additional policies for rates remission and postponement? -

8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -

If calling ask for Nigel Bickle

File Ref: ADM-01-03-6-24-854

30 January 2024

Chair Hinewai Ormsby, Chair
Chair

HB Regional Council
159 Dalton Street
Napier 4110

Dr Nic Peet

Chief Executive

Via email: cr.hinewai.ormsby@hbrc.govt.nz Nic.Pet@hbrc.govt.nz

Kia ora Hinewai and Nic

Submission to the Hawke's Bay Regional Council draft changes to Rating, Rates Remission and Postponement Policy and Revenue and Financing Policy

Thank you for the opportunity to submit on the Hawke's Bay Regional Council Rating Changes.

The Hastings District Council has reviewed the changes and consultation documents. This review concluded that:

- The documentation was thorough and well-considered.
- Funding Policy decisions were more influential on rate changes than the change from Land to Capital value.
- The recommended funding policy changes generally created a fairer spread of funding costs.
- The changes to Passenger Transport including the funding area spread are not supported.

The Hastings District Council is generally supportive of the changes but would like the Passenger Transport funding reconsidered.

Additionally, the Hastings District Council would like the rate changes to be deferred to the 2027 LTP for affordability and the management of rating impacts from Cyclone Gabrielle costs.

The Hastings District has had the largest financial and infrastructure impact from Cyclone Gabrielle including damage to Hawkes Bay Regional Council assets. The funding of these repairs will challenge the current rating systems for HDC and likely require significant changes.

This will likely result in significant rate increases for all parts of our community in addition to large increases in flood protection funding costs for the Heretaunga Plains including Hastings.

The cumulative effects of all these changes need to be carefully and collectively considered by both HBRC and HDC. To facilitate this, we request the following.

1. The HBRC rating changes be deferred until 2027 (or earlier by an amendment to the LTP).
2. HBRC and HDC collectively consider the impacts of respective rating changes and recommend policies, timing, and phasing to manage future significant rate increases.
3. HBRC and HDC set up a working group to review the collective changes and make recommendations to HBRC and HDC on implementation.

Cyclone Gabrielle has had a massive impact on people. The funding of the repair costs needs to be carefully considered against affordability and financial impacts and we request time is allowed for these to be properly considered.

We have also been recently advised of some modelling errors for network utility operators including Hastings District Council. This issue will be canvassed in a later separate submission.

We would like to speak to this submission.

Yours sincerely



Nigel Bickle
Chief Executive
nigelb@hdc.govt.nz

Submitter ID: 550

Hearing? No

Ross Frankin, Caroline Thompson, Brent Chamberlain, Gary Borg (chief financial officers) on behalf of Hastings DC, Napier CC, Central Hawke's Bay DC and Wairoa DC

Constituency: all

Type of property/ies: Other

-
1. Do you support the proposed move from LV to CV for the general rate? -
 2. Do you support the regional economic development rate proposal? -
 3. Do you support the flood protection and drainage schemes proposal? -
 4. Do you support the passenger transport rate proposal? -
 5. Do you support the freshwater science charges and new targeted rate proposal? -
 6. Do you support the sustainable land management and biodiversity/biosecurity proposal? -
 7. Do you support the additional policies for rates remission and postponement? -
 8. Do you have feedback on any other of the proposed changes to the draft Revenue & Financing Policy? -



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7 February 2024

Submission on HBRC Review of Revenue & Financing Policy Impact on Territorial Authority Utility Assessments

Introduction

HBRC are consulting on a review of its Revenue and Financing Policy. The proposal includes a number of proposed changes to the way it collects rates.

The HBRC consultation document sets out the changes and it provides sample properties to show some property impacts. It also comments on the impacts for certain categories of land.

The region's territorial local authorities manage utility networks on behalf of the community (Water, Wastewater and Stormwater). These networks have no underlying land value as they are not linked to any specific land parcel. The capital value of these community assets is significant. In terms of total Capital Value of the 3 waters assessments stand out as being disproportionate to other rateable assessments in the rating database.

This submission deals specifically with the potential impacts of the proposed new policy on the utility assessments (3 Waters Community Infrastructure) of the Hastings District, Napier City, Central Hawke's Bay and Wairoa District Councils.

HBRC Proposal and Consultation Document

Based on the consultation document the region's 4 territorial local authorities have formed the view that there was no intent, on behalf of HBRC, to significantly change the rates payable by the territorial authority utility assessments.

We support this intent as the territorial authorities have similar objectives to HBRC and community infrastructure assets do not impose any significant burden on HBRC's services.

On reading the explanation of rating methods we found that this intent does not seem to be conveyed effectively in the proposed rating policy. Without modification, the proposed policy will impose significant cost increases on the territorial local authorities due to the high capital value of assessments and the way the various capital value rates are described.

Revised modelling provided by HBRC officers has confirmed the potential financial impact. The data provided indicated that rates will be charged based on the full capital value for the general rate and the various drainage and flood control schemes.

The data provided does indicate that no rates are payable for economic development and subsidised public transport. We are fully supportive of this.

The draft policy (explanation of rating methods) clearly states that utilities are excluded from the Regional Economic Development targeted rate. It also states that Subsidised Public Transport is payable by rating units in Napier and Hastings within a designated valuation roll footprint. We assume, based on the amended rates impact data provided, that the Napier and Hastings council utility assessments are excluded from this footprint. It would be useful if this was made more apparent in the policy documentation as the map on page 15 of the Maps document just shows the broad areas including Hastings and Napier.

Requested Changes to the Proposed Policy

We request that the specific policy wording be amended to modify the impact on the utility assessments of the region's territorial local authorities.

These assessments represent the value of community infrastructure delivering essential water, wastewater and stormwater services to the Hawke's Bay community. The value of these assessments is disproportionate to other assessments and they differ in nature to other rateable assessments in that they are not attached to any land parcel and the assets are all under the ground. In addition they do not place any great burden on HBRC services.

HBRC has a range of tools that enables it to modify the impact of its proposed rating policy change to Capital Value. This includes the application of a differential, capping the maximum value to which a rate applies, excluding certain assessments or property categories from particular rates or introducing a remission policy to adjust the amount payable.

We ask the HBRC changes the draft policy to either:

1. Exclude the 3 waters utility assessments from the broad groupings or properties to which Capital value rates apply, or
2. Apply a differential to modify the impact on the 3 waters assessments, or
3. Modify Council's remission policy to adjust for the additional impact the proposed policy change will have on the 3 waters assessments of the region's 4 territorial authorities.

Yours sincerely



Ross Franklin
Chief Financial Officer
Hastings District Council



Caroline Thompson
Chief Financial Officer
Napier City Council



Brent Chamberlain
Chief Financial Officer
Central Hawke's Bay District Council



Gary Borg
Chief Financial officer
Wairoa District Council

ENDS-