This document is a summary of the 2024-2034 Long-term Plan submissions. Best endeavours have been made to summarise the submission, but you should always refer to the actual submission itself for full details.

No.	Name	Submission
		Submissions being Heard
77	Meridian Energy (Andrew Feierabend)	Capital Value for rates – submitter supports the move to a rating by capital value across the region as permissible. The submitter notes that: - any rate must still be fair and equitable and must reasonably apply the criteria of the applicable legislation, including consideration of how exacerbators and benefiters pay. In this regard, Meridian seeks two decisions from Environment Southland. These are: - to reflect the disproportionately high capital value of the MPS assets, Meridian seeks application of a differential of 0.50 as an electricity generator, or other differential factor that creates a level of transparency, and equity between industry contributors to the rate; - that the funding raised adequately provides for the proper maintenance of the Waiau Catchment with respect to river management and erosion control. Flood Protection Infrastructure rate — submitter supports the introduction of one flood protection Infrastructure rate to replace the catchment rates. Submitter notes that this is important to Meridian because if the Lower Waiau catchment rate were still to be collected and the region-wide rate were to be applied in addition, Environment Southland would be seeking to collect rates twice for the same work. That would amount to double dipping and be unlawful and invalid. Region-wide rating of Flood Protection Infrastructure rate — submitter has no issue in principle with moving the basis of rates collection to a region-wide rather than a catchment-based approach. Catchment reserves — submitter supports the use of all financial reserves acquired in a catchment to be spent in that catchment in the future.
44A	Waiau Catchment Liaison Committee (Paul Marshall & Peter Baker, Co-chairs)	 Waiau River/Meridian Energy – the submitter refers to: the unique position of the catchment where 95% of natural flow from the lower Waiau River is diverted for the purpose of hydro-electric generation; the Waiau Working Party consultation process resulting in the 1996 suite consents for the Manapouri Power Scheme; the specific resource consent allowing damming and diversion of the lower Waiau River; the drafting of the Waiau Agreement 1996 between ES, Waiau community and the then owner of Manapouri Power Scheme ECNZ, (now Meridian Energy); execution of the Waiau Agreement creating Waiau Special Rating District and the annual contribution Meridian Energy to fund the annual works programme and provision of reserves;

No.	Name	Submission
		- the implications of the rating changes proposed within the LTP for the ongoing management of the lower Waiau River within the purview of the Waiau Catchment Liaison Committee and within the terms of the 1996 Waiau Agreement.
		Rates structure – the submitter is concerned that with the proposed rating change, the purpose of the Waiau Special Rating District will change and that change would be sufficient to undermine the validity of the Special Rating District, as provided for the Waiau Agreement. As such, the rating proposal would undermine the funding mechanism, which has provided for the annual works programme. The submitter considers that this would be of significant detriment to the ongoing management of the lower Waiau River and must not be allowed to occur.
		The submitter considers what while the change in rating basis from land value to capital value is compelling, in the case of the lower Waiau River catchment the unintended cost would be too great.
		The submitter states that: - "while the current consenting provisions for the MPS remain and with them the 1996 Waiau Agreement remains valid the current Land Value basis of rating for the Drainage rates which comprise the Waiau Special Rating District, should remain unchanged;
		- that the reserves accumulated through the levying of each of those constituent drainage rates should remain within the purview of those local areas and the accumulated disaster reserve and the special projects fund must remain separately identified and accounted for under the purview of the Waiau Catchment Liaison Committee".
		 Catchment Liaison Committees and Accumulated Reserves – the submitter is concerned that: "the proposed in the LTP, the proposed Policy -Financial Reserves, section 3 – Principles and Objectives, does not explicitly require Council to have regard to the process by which reserves were accumulated nor consider the purpose for which the reserves exist. Instead, the Principles and Objectives appear to provide Council with cart blanche in the use of all reserves held by it, provided the tests of prudence, transparency and accountability are met.
		- with respect to reserves accumulated by local communities for a specific purpose, those monies are effectively held in trust by Council on behalf of that specific community. It is that relationship that is missing from the draft LTP –Financial Reserves Policy."
		The submitter lists four specific recommendations for the hearing panel to consider. Background information is also appended.
44B		Additional information was supplied on the flood protection infrastructure rate: - insufficient time has been allowed for public consultation; - the proposed rates increase for 2024/25 is unacceptable and the submitters considers that the proposed rate is deferred for 12 months.
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No.	Name	Submission
		The submitter: - opposes the borrowing of \$73M by 2034, as proposed; - supports the proposed funding of biosecurity and land sustainability by way of a general capital value rate.
60 – split with CCS	The Future is Rail (Dave MacPherson)	Main South Railway Line – submitter proposes that Council contribute funding in Year 1 of the plan towards: - a scoping study on the re-establishment of a scheduled passenger rail service between Christchurch and Invercargill; and - a scoping study to outline the possibilities of future commuter rail services in the Dunedin and Christchurch areas; with the funding to be split evenly between Southland, Otago and Canterbury. Submits that passenger rail be supported, as passenger rail is the only significant transport mode choice that is to offered in the regions. The climate change strategy hearings will deal with the question to ensure there is net zero CO₂ emissions by 2050. The submitter also comments on a submission sent to Otago Southland Transport Committee.
42	Te Anau Catchment Liaison Committee (Barry Taylor, Chairman)	Rates – submitter comments that to consider whether capital value rating is best and fairest, a year's delay in making the decision will benefit everyone. Flood protection infrastructure – submitter is unsure whether the timing is right with inflation, to increase operating expenditure by \$2.3M per annum. Submitter considers rates collected must stay in their areas. Notes that in all documents Te Anau rivers and areas are not mentioned once.
63	Mataura Catchment Liaison Committee (Hugh Gardyne, Chairman)	The Mataura Catchment Liaison committee (MCLC) explained its purpose then stated that it has some significant concerns including that insufficient time was allowed for reasonable public consultation. States its submission theme is conservation and that understanding conservation will replace the need for the flood and infrastructure rate. Key issues in the LTP are: The revenue, finance and policy change Rating changes Regionalising a stopbank structure maintenance expense Opposes the flood maintenance and infrastructure rate. Disagrees with LTP budget changes/increases.

No.	Name	Submission
		Submitter: 1. supports the shift to capital value rating; 2. opposes regional rates vs catchment rates; 3. opposes flood maintenance & infrastructure rate; 4. opposes LTP budget changes including revenue, debt and government grants; 5. comments LTP doesn't talk about the affordability of rates and huge increases in debt. 6. believes the financial reserves policy lack clarity on the ownership of reserves; 7. wants catchment liaison committees to become community boards.
09	Geoff Scott	Submitter has concerns regarding public consultation and breaches of the Principles of Consultation Act 2002. The differing information on websites and wording in documents quite clearly state two different things. The conflicting and misleading data on UAGC rates both written and verbally presented. Submitter notes information that is confirmed by Internal Affairs "that anything that will impact on all individual stakeholders/ratepayers must be presented and/or supplied with the appropriate information. This needs to be sent to each individual stakeholder in a timely manner that allows them to process research and question all data before making a clear and fully informed consent to consult on the proposed changes. There needs to available time and process for each individual stakeholder/ratepayer to contact the appropriate authority, i.e. ES, to question and receive an adequate fully informed response and, if needed for further information, to be able to request further information to again have the adequate information on hand, to fully consult on the proposed documents being asked for by ES to submit on." Submitter considers that the drop in or public meetings were held at inconvenient times and at poorly advertised locations, and when arriving at a meeting or drop in there was very limited material for stakeholders/ ratepayers to take away and study to enable them to consult on.
		Submitter also had concerns about his inability to contact staff.
262	Geoff Scott	Submitter wants the council to stay with the status quo where the 2024-2034 LTP is concerned. No immediate rate changes.
262B	Geoff Scott	Consultation - Submitter comments Facebook page was ambiguous, there are breaches of the Consultation act 2002.
262C	Geoff Scott	<u>Capital- based rating system</u> - Submitter does not support capital-based rates system.
		Draft LTP does not consider elderly or very low fixed income families or individuals.

No.	Name	Submission
		Family has two properties and neither generate a liveable income, one will become a debt-producing property should this LTP (capital-based rates) be adopted. Believes many are in the same boat and will be heavily impacted financially.
262D	Geoff Scott	Flood protection - Hamstringing effects of IWI, Fish & Game, Forest & Bird consents. Unrealistic costs of permits for gravel removal.
		Impact of wasps and the impact on flood-bank structure.
		Believe we could just stay with a well-maintained level 3 maintenance infrastructure.
262E	Geoff Scott	 Consultation - notification processes, both legal and morally ethical Process was flawed. Didn't get the Envirosouth Autumn edition. Contacted team and still waiting to hear back about how it is being handled as understand it is not an isolated occurrence. Magazine Content and Layout
		 The fact that LTP consultation information was inside the magazine (page 12) was not highlighted on the front cover, even though it will have big impact on ratepayers. Does not address the potential capital rating structure, only flood protection infrastructure. Should have had more information in the magazine and give the people time to study/understand.
		 Front cover layout Does not say on the cover that the LTP initial information is inside.
79	Ewen Dunnage	Flood protection infrastructure – would prefer to see another option.
		Submitter wishes to comment on the flooding at Makarewa Bridge on state highway 6, he has been stranded twice due to flooding. Suggests that the north and south approaches be raised to prevent flooding on road. Emergency services and all traffic to the north and west is blocked by this flooding. Wallacetown highway is also blocked.
04	Martin Gledhill	Flood protection – comments on flood impacts, noting "separation of coastal and inland flooding needs to be clear".
		Rates – (kind of) supports increases if real outcomes demonstrated.

No.	Name	Submission
		Other topics – big issues appear to be: - stoats, cats, then possums, pigs, deer; - extensive destruction of native beech forest; - pine tree invasion; - farming intensity; - long-term replace willow/poplar trees along every river, creek and wetland by planting beech. Asks if any environ groups to assist around Te Anau.
02	Under 20K Income Ratepayers (Alanna Barrett	Revenue and Financing Policy Shareholding in South Port NZ Limited Fees and Charges Significance and Engagement Policy Representation Review Above marked for feedback, but no comment given.
05	Doug Fraser Note: Submitter replaced first submission with second version showing yellow highlights indicating addition made. No other changes.	Refers to his 2021 submission (appended) highlighting the burden falling on rural ratepayers of upgrading the IT capability and responding to central government expectations. Comments that given the change in central government's expectations, it surprises and disappoints that there is no indication of resizing at ES. Rates - comments compounding increases are unsustainable. Trust is eroded with plan to change the rating formula to one which provides no transparency, or relationship between the beneficiary of services and the rates levied.
202	Andrew Morrison	Consultation Document and Options - the Consultation Document was presented well splitting the major issues into the two appropriate conversations: 1. the proposed Works Programme and Budgets giving clarity to the potential rates increase; 2. the Proposed changes to the Revenue and Financing Policy.

No.	Name	Submission
		As a responding ratepayer, we need to mentally separate these conversations for context. In general conversations, I get the sense people are struggling to grasp this and may respond without grasping the importance of the latter conversation.
		The document and online Rates calculator are premised on demonstrating the impact of the acceptance of both the rates increase and the acceptance of moving to Capital Value rating. To give complete transparency to the implications of not supporting the proposed capital value rating implications, it would have been beneficial to demonstrate that implication also.
		Work Programme and Budgets - supports the focus on community protection with the Flood infrastructure programme.
		Rates - believes the magnitude of the rates increase is too great for the community to support. If this is the case council may consider three options; • Reduce expenditure.
		Increase non rate related revenues.
		Staggering or phasing the flood infrastructural conversation.
		Does not support the reduction in the UAGC and encourage council to maximise the to its legislated 30%.
		Supports the use of Targeted Rates where specifically appropriate i.e. Pest Control.
		Supports Government co- funding for capital flood protection projects.
		Supports debt funding to reflect the intergeneration investment for capital protection projects.
		Support councils' investment in data capture to inform flood protection programmes and strongly encourage considerations of alternative flood mitigation investments i.e. slow the flow.
		Supports and commends the council's self-imposed debt Maximum disciplines.
		Revenue and Financing Policy - supports moving the Flood Protection Infrastructure and Biosecurity and Land Sustainability to a Capital Value rating model. I believe this is a more equitable model and reflects some key principles.
		Southport NZ Ltd Shareholding - supports council maintaining a minimum 51% shareholding in Southport and investigating the sale of its additional shareholding.

No.	Name	Submission
		<u>Financial Resilience</u> - does not support the increase of financial reserves. This can almost be viewed as policy an either /or policy. Either commit to fund the Flood protection Infrastructure /or build financial reserves to cover the cost of "events".
175	Mid Dome Trust (Ali Ballantine)	 Wilding Conifers - Trust wants ES to understand the significant threat wilding conifers pose to mid-dome & elsewhere in Southland. Seeking increased level of support through the LTP to complete the programme in the next 10 years. Increasing the direct financial contribution of the council from \$50,000 to at least \$80,000 per annum for wilding conifer control at Mid Dome. Utilise the proposed capital-value based Biosecurity rate from landowners within our Programme Area for wilding control work. Council lobbies government to increase its contribution to the National Wilding Conifer Control Programme from the current \$10M pa toward a target of \$25M pa. Advocating Crown land managers with land management responsibilities within our Programme area i.e., DOC and LINZ, to properly fund their responsibilities with respect to wilding conifer control on their land now and in the future. Supporting a national co-funding regime to seek contributions from those who benefit from or contribute to the needs of the National Wilding Conifer Control Programme. Providing more comprehensive and robust regulatory tools through the Regional Pest Management Plan to protect the wilding control investments made to date at Mid Dome and elsewhere in Southland.
		7) Support the transition of wilding tree management responsibility under the RPMP from the trust to the respective land holders within the Mid Dome Programme area once all coning trees have been removed. Concerned about the recent changes ES staff have made to the trusts structure and operation, as they don't have the resource to fund additional services.
22	Liam Calder	Submitter comments on the need for improved youth engagement in Southland's environmental and regional decision-making processes. Urges Council to engage with youth through schools, student councils and youth organisations.
54	Southern Pest Eradication Society (Phil Golden, Vice Chairman)	Targeted rabbit control rate – submitter comments on how well the Society is running under the ES contract with the Society.

No.	Name	Submission
70	Sally McIntyre	Flood protection infrastructure expenditure – does not support the preferred option.
		Comments that the IPCC is government controlled and represents government opinions not science. ES and central govt have oversimplified both the problem and solution to climate change. The plans for climate related hazards could harm communities and the regulations for dealing with the environment and health and safety have reduced health and safety.
		ES climate change mitigation will reduce the wealth of Southland. Argues that ES governance and management are more of a hazard to Southlanders wellbeing. ES has a lack of transparency, openness, consultation, excessive documentation. The plan is not efficient and effective and put together too late to consider community views. Does not believe it will enhance the wellbeings. Is not affordable for ratepayers and the four councils have huge amounts of debt forecast.
		States in the Annual plan 2023/2024 foreword that "our climate adaption work is well in-train. ES has set a target of becoming a net zero council by 2050 and initiatives are underway to achieve this" – supply evidence of this target can be delivered.
		Council lacks sound budgetary skills, the rates increase will feed inflation. The massive hikes haven't been effectively conveyed to ratepayers or explained enough for ratepayers to fully understand.
		Supports Mataura Catchment Liaison committee reasoning to delay the flood planning and infrastructure rating for at least a year and to engage with the communities 'on the road". There is no guarantee of government resilience funding, and the council should stand up and say no more taxpayer money for unsustainable costly programmes. Councillors need to vote against the draft LTP.
80	Cheryle Blight	Revenue and Financing Policy – Changing How We Rate
		 Does not support the proposal to have a new flood protection rate. Supports the proposal to move the Biosecurity and Land sustainability rates from land value to capital value. Supports spreading the cost of flood protection infrastructure region-wide.
82	Craig Edgerton	Revenue and Financing Policy – Changing How We Rate
		- Does not support spreading the cost of flood protection infrastructure region-wide.
130	Carmen Stewart	Flood protection infrastructure - Would like to see another option/view for Investing in flood protection.
		In time of fiscal difficulty for so many, ES decide to increase rates for some of us over 40%. This is unacceptable and irresponsible.

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		The public expects fiscal transparency and responsibility and ES is not showing this. Land value rates and <u>not</u> rates on buildings and others the local govt. already claims rates for.
		Changing the assessment criteria is irresponsible and terrible for many of us .lt would be more pragmatic to apply an increase that is consistent with inflation. ES cannot demonstrate any work that justifies the huge increase. Time ES who transparent work population AND work done.
		Consultation - insufficient responsible notification of the increases to ratepayers.
38	Chris Carran	Rating System – submitter comments present system is not equitable, and until a formal review of Council activities has taken place the submitter opposes any increase in rates.
		Any changes to the rating system should be discussed with the ratepayers in a public well-advertised meeting. Put the change on hold for 12 months until the Council and ratepayers have had a chance to discuss and debate the issues.
		<u>Liaison Committee meetings</u> – submitter comments meetings should be made open to the general public, with the committee meeting prior. Minutes of the meetings should be circulated after the meeting.
179	Russell Macpherson	Capital value rating - Don't support capital value rating, concerned about ES attitude that people in high value properties have endless ability to pay.
		Should be encouraging wintering sheds for dairy farmers but this would increase rates, with a lessened ability to pay due to cost of shed that has environmental benefits.
		Flood protection infrastructure - Agree flood protection should be paid by everyone not just the landowners protected by the asset.
		Rates - should be based on classification of land and the uniform charge should be at the 30% of the general rate.
197 –	Jenny Campbell	Supports following essential plans and services being continued in the LTP:
split with CCS		1. Continuing ES Regional planning.
		ES Biosecurity funding for weed and pest control including marine pests.
		3. ES funding for community conservation and catchment groups alongside QE11 Trust activities;
		4. ES funding for Predator Free initiatives including Predator Free Rakiura/Stewart Island is a must in your budget and must be implemented because of all signs of the destruction by introduced predators;

No.	Name	Submission
		5. climate resilience projects is an imperative for me as I see Murihiku being very vulnerable in this space.
		Rates increases - I am prepared to pay rate rises for essential services e.g. Kā Wai e Toru in order to take the burden off future generations. We learn from our Tipuna and Heritage.
		Commends the work of ES Councillors, staff and contractors for all their commitment and mahi, to ensure Murihiku is prepared for the many possible threats to our environment locally, regionally, nationally & internationally.
		Whakataukī: Titiro whakamuri, kōkiri whakamua. Look back and reflect so you can move forward.
129	B Cronin	Flood protection infrastructure - Would like to see another option/view for Investing in flood protection.
		During a financial and cost of living crisis, you decide to increase rates by a huge percentage. No cuts in staff, no transparency in your spending, you just want money. Seriously?! Get real!!
140	HW Richardson	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.
	(Sue Hill)	HWR Group acknowledges the importance of investment in flood infrastructure to improve community resilience and ensure a safe living environment for the people of Southland. Improved flood protection infrastructure will have wide-ranging benefits for Southland communities and the regional economy.
		• It is our submission that the proposed rate increase is not the appropriate approach to fund investment in flood infrastructure. The rate increase is substantial and will create a financial burden for Southland ratepayers. Commercial and rural property owners will be particularly impacted, with a disproportionate increase proposed based on the capital value of a property.
		HWR Group submits that it would be appropriate that flood protection infrastructure funding be provided solely or primarily by Central Government.
		We encourage Environment Southland to retain the status quo and seek additional investment from Central Government.
191	Annie English (Hamish English speaking on behalf)	 Rating system Prefer that the rating system for flood protection is targeted to local catchments and urban areas using the targeted rates classifications already available and adding a town or project specific rate for new flood protection investment. The proposed new investment in flood protection should be raised using targeted rates for the towns that will benefit. The targeted rate
		classifications already exist and can be tailored to town sections.

No.	Name	Submission
		Using targeted local rates for particular projects such as bank raising at Winton and Lumsden as well as the UAGC and general rate contributions would be more reflective of the benefits. All communities need to be aware of and contribute to the direct costs of their own protection.
142	Invercargill Saleyards Co Ltd (Colin Lindsay, Director, and Dave	On behalf of the Directors of the Invercargill Saleyards Company Limited, which owns and operates out of 49 Wallacetown Lorneville Highway, Invercargill (Valuation Number: 2960012702)
	Marshall)	<u>Change to rating system</u> – opposes the proposed change to rating system. Submitter believes there has been insufficient time made available for rate payers to consider the full impact of proposed changes and for Environment Southland to fully consider all possible alternative options.
		Has concerns that the proposed changes will not just be limited to rates incurred but will also result in an increase in costs for other services it is currently charged for.
153	Garry & Bev Swney	Involved in dairy for over 45 years.
		Capital-based rating system –strongly disagrees with moving to a Capital-based rating system as feel will be unfairly penalised.
		Submission outlines the approach they have taken, at significant cost, to build substantial infrastructure on their property, including a cowbarn for housing during winter. The infrastructure on their property adds substantially to its sustainability value and also from an animal welfare perspective and fully engages with the ES document, page 19, no. 2.
		"Our land sustainability work supports landowners and managers to have healthy soils and waterways, riparian planting, and good land management practices, including for waste/effluent, farm plans, grazing and more. The impact of this work contributes to a healthy environment."
		The above statement confirms our beliefs for the sustainability of our property. Out infrastructure costs to achieve this have been huge. Why should we be penalised in perpetuity by a Capital Rating System?
103	Christine Smith	Infrastructure strategy – ES and ICC should work collaboratively to undertake dredging to substantial depths of Ōreti River mouth, areas upriver below the Dunns Road bridge and large areas of the New River Estuary to contain the river and sea tidal volumes.
		No upriver flood bank protection plan for this river or the Waihopai, which have shown to fail in other areas of NZ very recently.

No.	Name	Submission
		Natural tidal estuary margins could be re-established and other options for use of the areas could be considered.
10	John Turner This submission has had detail on Climate Change taken out, as it will be considered in a separate session.	Flood protection infrastructure – submitter considers using a capital value rating system as unfair, inappropriate and unequitable. Considers using capital value penalises those that try to improve the environment by erecting wintering barns, fencing of waterways and the like. All improvements increase the capital value of a property and has no relation to the collection of water in relation to flood protection. Submitter considers using a land-based system is more of a user pays than what is being proposed. Reserves – agrees that Council should use them as they are being inflated away. South Port shares – agrees there should be a sell-down to 51%. Amalgamation – Long-term Plan does not mention amalgamation. Considers that with ever-increasing costs and decreasing population a unitary authority must be of prime consideration. Pest Control – submitter has concerns about increase in possums and the risk of TB. Asks that ES surveys ratepayers.
154	Geoff & Susan Smith	Flood protection infrastructure - would like to see another option/view for Investing in flood protection. I am a pensioner, living on one pension to cover: Power Rates – Regional Council Rates – District Council Phone Insurance Food Firewood Emergencies There are weeks we eat hardly anythingand petrol?! Other feedback - climate change has been happening for over 40 years?! Now you want us to take up your slack. This is not right!

No.	Name	Submission
157 – split with CCS	Fish & Game (Jacob Smyth)	 Flood protection infrastructure - supports proposal to use funds from the Flood Protection Infrastructure Rate to invest in: Enhancing data collection and analysis for better understanding of Southland's river systems, infrastructure performance, and appropriate mitigation measures; and Building expertise and capacity within its catchment team. Has concerns about plans to implement a capital works program throughout the Long-term Plan that focuses on new flood infrastructure, including repayment of debt associated with it. Fish & Game is concerned that the proposed Long-term Plan focuses too narrowly on using engineered solutions to protect land, assets, and people from flooding. The Long-term Plan discussion document makes two passing references to "gravel management" in the context of "immediate flood protection and river management" without elaboration. It is unclear what the intent of SRC is regarding gravel management and what, if any, funds from the new Flood Protection Infrastructure Rate are to be devoted to it, including the inadequacy of current monitoring – clarity on the point is sought by Fish & Game.
		 Other feedback: seeks that the Long-term Plan recognises that rivers, ideally, should be being left alone, rather than interfered with. This requires the resolution of the larger systemic issues, such as strategically relocating vulnerable infrastructure outside active river corridors. Not clear what risk, benefit, and cost assessment methodology is used by SRC to determine the appropriateness of interventionist river works the reinforcement eventually fails the consequences will be greater. Concern that little, if any, reference is made in the Long-term Plan discussion document to any funding being allocated to deliver flood protection work through less engineered / nature-based means. It is unclear how the intent of SRC to implement a capital works program across the network throughout the Long-term Plan period (2024 – 2034) fits with the advice from the recent Fuller report. There is significant opportunity to address issues associated with drainage via investment in the creation and restoration of wetlands. This aligns with recommendations by the Regional Forum to SRC and Te Ao Mārama in June 2022, including the formation of a multi-agency Wetlands Task Force to promote, support and facilitate wetland development. Regrettably, little progress seems to have been made on this recommendation to date. Fish & Game submits that the Long-term Plan should recognise and provide funding to assist with the development and restoration of wetlands associated with drainage districts. For example, funding LiDAR data, which provides highly detailed and accurate elevation information, to identify areas that are suitable for the creation of wetlands.

No.	Name	Submission
		• Fish & Game submits that the Long-term Plan should provide additional and ongoing funding for gravel monitoring in accordance with the following recent recommendations made by Professor Ian Fuller to SRC to inform gravel management in Southland.
		Climate Change Strategy - strongly supports the intent of Climate Change Strategy to unite the efforts of the four local government councils in Southland, Te Ao Mārama Inc., and Great South to address climate change through mitigation and adaptation.
		Combating climate change and mitigating its impacts are one of the most significant challenges facing Southland. Fish & Game considers that the Climate Change Strategy represents a good start in this regard. In addition, Fish & Game considers that the four local government councils in Southland, including SRC, should seek to:
		• contribute to achieving NZ's emission reduction targets. This includes considering the emissions from activities that can occur under their respective plans by way of both permitted activities and consents granted; and
		• mitigating the impacts of climate change on communities, including making room for rivers, wetland restoration and floodplain management through the managed / strategic retreat of vulnerable infrastructure and upgrading over time of infrastructure that is no longer fit for purpose.
		Infrastructure Strategy - The Infrastructure Strategy provides little detail about why a change in approach is required over its 30-year life span. Fish & Game considers that the Strategy could be improved by:
		• Stronger recognition of the challenges posed by climate change in Southland, including frequency of larger scale flood events and frequency of drought/extended low flow events, the latter not being mentioned.
		Providing clarity around how and when " the transition to alternative ways of managing floodplains over the medium and longer-term" is to occur.
		SRC needs to engage with the community to understand the need for changes in how it manages rivers, why it needs to work in new ways (from 'command and control' to 'living with rivers') and the proposed timing of changes.
242	Lloyd McCallum	Consultation communication - The submitter noted:
		LTP communication was extremely poor.
		 Information was hard to follow on the website. ES needs to do much better in this area as you are losing the ratepayer's confidence as an organisation.
		 ES needs to do much better in this area as you are losing the ratepayer's confidence as an organisation. ES needs to talk face to face a lot more with the community to win back ratepayers.
		Rating Base - The submitter noted:
		The issue is transition to a Capital Value system should have been done well before starting this LTP consultation process.

No.	Name	Submission
		A large number of the ES rating base do not have the funds to meet the rating requests.
		The impact Waiau FMU has not been factored into the planning.
		Financial - The submitter noted and queried:
		10-year forecasting and work plans are un-workable and unaffordable - ES must live within its budget
		How is the \$18.978m made up? What will it be at end of the financial year?
		What assets will ES have at end of the 10 years and what debt and debt servicing cost will Rate payer have?
		Flood Banks - The submitter suggests and queried:
		What assets will we have at the end of the 10 years?
		How are you placed for the 1910 or "The Super Flood" that we see around the world?
		Where are you going to divert water or cut flood banks?
		ES needs to clarify how and when reserves will be used across the whole business.
		Need to drop your debt ASAP and have the ability to borrow, not use up your borrowing options in modelling.
		Fees and Charges - The submitter recommends:
		 Working with independent auditors (e.g. Q-CONZ) who are already auditing farms for other purposes, providing ES with a lot of cost savings and improving relationships with ratepayers and consent holders.
		South Port NZ - The submitter noted:
		• ES must not sell the shares as this is capital money spend and without owning South Port, Southland as a whole will be worse off.
		Southern Pest Eradication Society - The submitter states:
		Keen to have this service in their area or one like it.
		• ES has overpromised and underdelivered, this has become very political with some staff having a strong view to stop the programme.
		ES must learn to work with communities better.
		General - The submitter asks:
		What is ES's <u>Core Business?</u>
		If ES is a leader then what does it look like when you only go as fast as the slowest interest/pressure/lobby group?
		The submitter suggests:
		Do not need another rate, manage your present business better.

No.	Name	Submission
		A report should be provided to the council on how much money was paid to Consultants, Contractors, and Legal fees over the past 3 years by project, and then look at how many staff you need to employ, do you need both?
164 – split with CCS	Allan Baird	Investing in Flood Protection Infrastructure – recognise the importance of planning effectively for flood protection work, however council should look to re-prioritise their expenditure and not ask the community for more money.
		Rates increases - 66% rates increase in 4 years (2021 \$19.038m- 2025 \$31,590m). For the most recent financial period completed (2023), the Council broke even on rates of \$24,001m (capital grants removed from the surplus). You are asking the community for an additional \$7.59m or a 32% increase. These rate increases are not sustainable for the community and will continue to drive inflationary pressures in the economy.
		Staffing - the growth in Council staff numbers and costs cannot go unmentioned. In 2022, the annual report disclosed 180 FTEs with employee benefits totalling \$16.858m. In 2023, increased to 197 FTEs at \$19.454m.
		This plan continues a high growth in staff numbers. With \$24,203m being budgeted, based on average employee costs for 2023, increased by 10% (2 years pay increase), 223 employees results. I reiterate my point above; the community cannot afford this level of service and the council needs to find ways of working smarter.
		In 2018, the ES annual report discloses 159 FTE's. This would equate to a 40% lift in numbers (based on my calculated number of 223).
		In Summary, do not continue this staff growth trajectory. Use attrition & staff transfers to build a stronger catchment team.
		Revenue and Financing Policy - the Council received \$9,084m from Separate rates in 2023 (2023 Annual Report). In 2019 this was \$8.294m. This is a 10% lift over 5 years. Through the mechanism of the Catchment Liaison Committees, there has been strong budgetary discipline in this Council service. As I have discussed above, this discipline is lacking in other services provided by the Council.
		I am not against a shift to Capital Values as a basis for raising revenue for all Council Services. I concur with Council's observations that catchment issues are wider than land near the main stems of the rivers. The whole community receives benefits from sound management of flood infrastructure. If the Council chose this option, Catchment Liaison Committees would need to be fully involved to ensure community money was not wasted on poorly considered projects.
		Shareholding in South Port NZ Ltd – the Council holds its 66.48% stake at the historical cost of \$8.721m. This would value the 24% sold at \$3.171m. In the 2023 accounts the SPSBBR has now diminished to \$182,000. Notwithstanding anything the Council has said in its Consultation document, I am concerned this erosion of value could easily happen should the Council begin selling some of the South Port shares. The Port is a strategic asset

No.	Name	Submission
		for Southland. The Council should be looking at ways it can enhance the value of this investment for the betterment of the region. It should not be taking a purely portfolio argument and be saying we are overweighted in port assets.
		Financial Strategy - the Council did not invest in South Port, the assets were seeded to the council during local government reform in 1989. The Council has held this asset in its balance sheet at historical cost (\$8,721m). On this asset it is received a \$4.709m dividend in 2023. This is a 54% return on the asset it has recorded in its accounts. On page 6 of your draft Financial Strategy document, you are indicating a 3% return on bonds & equities.
		Why would you reduce the shareholding in South Port to go into bonds & equities? Bonds & Equities are liquid investments and are there to match the reserves, which could be called on at short notice. South Port is a strategic asset for Southland. A strong port will mean a strong region. Do not take a soft option & transfer some of the Council's inheritance into a portfolio investment that will do nothing for investing in Southland's future.
		<u>Debt</u> - I am critical of this strategy. Investing in assets that have solid cashflows enables debt to be used as part of the funding methods. These cashflows enable the debt to be repaid in an agreed timeframe with the funder. If the Council was raising debt to buy South Port shares, this would be sound business. The assets the Council is seeking to raise debt against will provide no certain cashflow. The protection provided by the additional infrastructure may get called upon or it may not. The only certainty is the interest payments on the debt & a repayment profile which will need to be paid for from rates. Some of the Southland TAs are in a debt trap, do not join them. I have more to say on this in the sections below.
		Climate Change Strategy — F=from 2021 to 2024 the Council received \$30.458m in capital grants for shovel ready projects. It will have also committed around \$18m of community money to these projects (debt balance in the draft financial statements). The other TAs in Southland also applied for government funds for shovel-ready projects. Some of these had climate change justifications. Based on what ES spent, well north of \$50m has been spent on the mitigation of climate change risk (flood & inundation protection). Ratepayers in Southland are not a bottomless pit for project money. Every project identified needs scrutiny for reasonableness over other competing projects for community money. The TAs are in a fiscal bind over Three Waters projects which have escalated out of control. Do not add more pain to the region in the form of debt to be repaid, on a notion that we may still be at risk from flooding assessed from climate change modelling.
		The Council and central government has invested in LIDR for the region. Look at the data on gravel build-up around critical infrastructure and facilitate its removal. Properly maintain the existing bank infrastructure before diverting new funds into topping up banks. Any new bank infrastructure should be supported by the Catchment Liaison Committees.
		Infrastructure Strategy - Environment Southland (ES) has given significant thought to the infrastructure needs for Southland over the next 30 years. Banks can't be built at short notice & therefore sound planning & prioritising is required. As I discussed above, there has been some catch-up spending in the province, precipitated by central Government seed money. At the conclusion of this, the Council is showing \$18m of debt that the

No.	Name	Submission
		community must service & repay. The infrastructure plan sees significantly more debt being incurred, with no sign of it declining by 2034. With knowledge of what other Southland Councils are grappling with, I don't believe this strategy is affordable for the region.
		ES is fortunate to own a significant share of the port company & to own a large, leased land area. I believe it is time for the Council to re-set its business model & be true to its "Guiding Financial Principles" (GFP), particularly point 1. The Council should not be using the South Port Dividend to off-set the general rate. This money should be used for investment in the province, with particular emphasis when it can attract central Government money on a 1:4 basis.
		As your own demographic report shows, our population is growing slower than the rest of the country & is aging. Saddling debt on to the next generation may seem appealing, however it could be detrimental to the longer-term commitment of people to this region.
		In summary, use investment income to fund the region's infrastructure upgrades and not more debt. Pay down the current \$18m of debt to allow headroom for future unforeseen events (GFP 3).
		<u>Fees and Charges</u> - I am concerned that the Council is using "single provider option" to escalate fee structures. In 2022 fees were increased by 20%, well above levels of inflation. The Council is again going for double digit rises in many fees. In an environment where inflation is trying to be contained, the Council is showing ignorance to this by rocketing up fees.
		Fees should be lifted by no more than inflation for 2025.
		Invest in technology to avoid sending white trucks for data collection. Further examine ways for resource holders to have a lower cost of service with the council. New Zealand businesses competitiveness has eroded following the last Governments many failed policies.
		You are reading the news on the Sheep & Beef sector struggling to breakeven & dairy only marginally better. The rural sector is not a bottomless pit for fees & charges. Review these schedules & only increase them for the rate of inflation.
168	Dave Marshall	Consultation – consultation period too short and poorly advertised. Lack of rating options offered for consultation.
		Money collected in the catchments should stay in the catchments. Ōreti ratepayers contributed to hundreds of acres purchased in 1980s, the surplus from these block18s should be spent in the Ōreti catchment, the same with Mataura.
		More good practice within Environment Southland with expenditure and accountability (e.g. Stead Street pumps for Lake Hawkins) is needed before further borrowing is entered into.

No.	Name	Submission
		Ratepayers cannot afford the rates increases and user charges proposed for the next 3 years.
169	Chris Henderson	I remember watching the devastation wrought by cyclone Bola, the millions of tonnes of topsoil lost, and the replanting of the damaged areas with pines. Both are examples of putting economics before the environment, which continues to the present day. Only when we realise that we rely on the natural environment for everything will we get our planning right. The cost of not doing so is already proving catastrophic on so many levels, not just in our country but world-wide, which is why this Hearing is so timely. Investment in Flood Control infrastructure Reinstate full protection of upper catchments, restoration of original indigenous cover, no further exotic plantations, no carbon forestry unless it is of native species. reinstate Rabbit Boards with a wider requirement to target all feral animals- deer, pigs, possums, ferrets, stoats and feral cats. Provide rates remission to landowners who may be affected by requirements to protect upper catchments. Groups dedicated to catchment protection and biodiversity enhancement need to be assured of continuing financial support as an investment. Delighted to note that the importance of wetlands in flood mitigation is recognised at last with a Wetlands Group being planned. Gravel - gravel build-up is the inevitable result of reduced water flows. It is pleasing to note the formation of a Gravel Group to address this issue, as the impacts on ecosystems, riverbed heights, coastal processes, lagoons, and estuaries are well known. Allowing rivers to use more of the original flood plain would help to slow its movement towards the coast and should be part of future planning as communities face change. Potentially affected landowners should be compensated where appropriate for allowing this to occur periodically. Meaningful public consultation needs to occur to ensure we do not keep making decisions based on economics at the expense of our environment on which we all rely.
		Other Climate Initiatives - pursuing the reinstatement of a passenger rail service from Invercargill to Christchurch. Sharing an earthquake-proofed H and J Smiths building with the Invercargill City Council and the Southland District Council and leading by example the adaptive reuse of existing buildings which have a lower carbon footprint than new buildings made from concrete and steel, for new creative uses.

No.	Name	Submission
		I am pleased to note the inclusiveness mentioned in the Climate Strategy. That is critical to our survival and is vital to our success.
		We need all our creativity, courage, intelligence, and humanity to ensure our amazing world is fit for all future inhabitants.
		This Plan is a very positive start!
172	Öreti Catchment Liaison Committee (David Rose and Dave	The change of rating system - oppose the change to the proposed 'one pot' capital value rating system. It will lead to less transparency and less accountability. Under the proposed rating change a single Liaison committee would be a logical outcome, diluting local scrutiny.
	Marshall)	ES to explore other catchment rating options - there are plenty of ways to spread the load of rates within the catchment. The existing classification system could be tweaked with the F class classification paying a greater percentage of the rate.
		Whatever systems that are modelled they need to support the current catchment rating model. We have no way of modelling any system so while we put suggestions forward cost modelling would help us determine our preferred option.
		We oppose the only model you have put forward. More consultation is needed with Catchment options modelled also giving ratepayers transparency and proper consultation rather than a railroaded single model.
		Reserves - we oppose any of our Ōreti reserves being used in any other catchment. We are shocked that the Draft Reserves policy would allow any of our reserves to be used Southland-wide. Money from the Ōreti must only be used in the Ōreti Catchment. We oppose the draft Reserves policy in its current format it is particularly disappointing there was no liaison when drafting or even a mention of Liaison committees in the document. As if we do not exist but maybe that is your true intention???
		Capital Projects - it is really bad practice to spend money first and then worry how you are going to pay for it. This is exactly where ES have got to and although the shovel-ready projects of \$18 million are largely finished. Funding is undecided?
		A recognised way to look at funding is using the principal of the beneficiary pays. For example, with the Lake Hawkins pumps with a cost of over \$9 million the beneficiary is the airport. Therefore, some sort of passenger tax is required to service and pay off the loan.
		Bank condition - It would seem little is going to the rural stop banks over the term of this LTP as urban is your focus.
		The OCLC requested at our AGM that a greater focus be put on Grade 5 defects. While the App records all defects it is hard to pinpoint how many Grade 5 defects there are, where they are, and no plan to prioritise and diminish these. It is hard to believe there is no one whose job is focusing

No.	Name	Submission
		on these, liaising with farmers, and prioritising a plan of action. Catchment Division only has a staff of 12 from a total staff of 202 (including part-timers) as of March 29th. We have asked for more staff for the Catchment Division previously by redeployment from other divisions in ES, not new staff. We mentioned at our AGM we are open to some of our lease reserves being used as a pilot project to help reduce the worst historical grade 5 defects on our Ōreti stopbanking system.
		<u>Tough times</u> - Cost of living crisis, increases in interest, depressed farming incomes, and a country in recession now is not the time to have huge rate increases. While your ratepayers are cutting costs wherever they can we do not feel you have done the same. With a massive change signalled in Government policy and a directive that you go back to core business, we believe there are many areas where savings could be made to help fund your catchment focus. However, a much stronger handle on staying within budget on projects is needed and demanded by your ratepayers.
		We your ratepayers do not approve a spending plan to indebt this council to the tune of over \$73 million in 10 years with the lack of detail about that in this plan.
182 – split with	Forest & Bird (Jen Miller)	Acknowledges the work being done to improve the region.
CCS	(Jen Miller)	Flood protection infrastructure - Seeks that council prioritises Nature-Based Solutions to manage flood protection and River Management, as well as increasing resilience to climate disruption: making room for rivers and wetland enhancement.
		Seeks that the LTP acknowledges the importance and uniqueness of braided rivers and the urgency to transition towards nature-based solutions. It seeks that this work is incorporated into the capital works programme and not deferred any longer.
		Climate Change Strategy - The LTP should ensure there is adequate provision for funding to progress the development of an action plan as part of the Climate Change Strategy.
		Seeks that the LTP acknowledges the increased threat of pest species in Southland as a result of ongoing climate change and ensures there are sufficient resources to manage or eradicate, where possible, pest species. This should include sufficient funding towards the review of the ES RPMS Seeks that Council increase funding for investment in wetland restoration and enhancement projects, and for this work to be properly integrated into the flood protection work proposed.
		Seeks that the level of funding provided by Jobs for Nature is maintained to ensure the gains made as a result of this funding is not lost. This should include providing on-going advice to landowners and seeking opportunities for further restoration and enhancement work.

No.	Name	Submission
		Conservation and catchment groups - Seeks that there is ongoing support of conservation and catchment groups to assist the region in protecting and maintaining its important indigenous species and habitats. These groups will be important to help achieve the aspirations set out in the proposed Regional Climate Change Strategy.
		Significant Natural Areas - Encourages the council to invest in the ongoing identification of Significant Natural Areas (SNA's) to ultimately provide the basis for objectives and policies within the regions policy statement.
		Recognise that nature is at the heart of the Aotearoa economy.
55	Ron Baxter	Flood protection infrastructure – submitter does not support this. Comments to stop spending money ratepayers cannot afford.
		Increase in rates – asks where does the money gathered all go? Councils already take far too much money in rates and how is it that ES cannot afford to fix everything that needs to be fixed.
35	Back 2 Health Ltd (Diana Pears)	Flood protection infrastructure – another option indicated. Submitter votes to halt most major flood bank work planned as she believes it is not the best financial option, nor the most effective or most environmentally friendly way to control the flow.
		Rates increase - submitter comments that the timing of the massive budget increase will cause serious financial hardship for many families.
		Consultation process - submitter comments halt the LTP, as the consultation process is inadequate and mostly indirect.
		Reserves – submitter is in favour of using some of the reserves to attend to only urgent work on flood banks (to a level 3 standard only).
		Submitter comments that Southland's civil defence can be improved greatly.
57	Invercargill City Council	Flood protection infrastructure – submitter commends ES for prioritising and budgeting flood protection planning.
	(Michael Day, Chief Executive)	Requests that: - ES prioritise investment needed to better understand the flood risks faced by the city;
	LACCULIVE	- budget provision is made for the delivery of the remaining Waihopai flood bank project, designed to work with the completed Stead Street
		stopbank and ongoing pump station improvements; - where further data and planning is required, ES does not rate in advance of capital works.

No.	Name	Submission
		South Port shareholding – submitter welcomes information on the proposed change to ownership and dividend. Capital value rating – the submitter supports a simplified rating system but asks ES to consider the impact on residential ratepayers through direct and indirect rates and asks that options such as differentials to address the equity of impact on ratepayer categories of the shift from land to capital
		value be considered. Submitter also that ES consider a three-year graduated shift from land to capital value of one-third, two-thirds and full shift.
		<u>Clean Air Loans Scheme</u> – submitter requests an end to the Clean Air Loan Scheme, due to the availability of commercial loans.
39	Fiona and Gavin McCabe	Consultation period – submitter comments consultation process has been rushed, poorly organised and poorly advertised.
		Flood protection infrastructure – other option is indicated. Submitter does not support proposal and does not agree with all new flood protection infrastructure being funded by borrowings and repayments by all ratepayers. Comments that gravel and silt should be removed from rivers, and slash and logs is a major contributor to flooding. What is being done about this.
		<u>Debt</u> – submitter does not support increase in debt.
		Government funding – submitter does not support Council reliance on government funding.
		Submitter comments there has been little consideration of affordability in the LTP. People are currently under a lot of financial pressure.
		Capital based rate – submitter considers more thought needs to go into its implementation – a one box fits all approach does not work.
		Reserves - submitter suggests the LTP be changed to a maintenance plan of all flood banks and riverbanks, with an expectation that all banks be maintained and kept at level 3 and to use some reserves to achieve this. Considers this a priority.
		<u>Civil defence</u> – submitter refers to poor response by Hawkes Bay civil defence and asks how Southland stacks up currently? Also considers this a priority.
183	Martin Sliva	Flood protection I do not want to see such a big debt increase, find other ways to fund flood protection.

No.	Name	Submission
195	Thriving Southland (Richard Kyte)	 Funding - requests sought: \$235,000 for Seed funding of key projects, including wetland development and targeted landscape and farm system mitigations. \$215,000 for Extension and Facilitation towards enabling continued on-the-ground action. The funding sought is less than 30 percent of Thriving Southland's annual budget, however funding from Environment Southland would show external funders tangible support from our regional council. The intention is to leverage off this funding (plus significant in-kind funding from community catchment groups) to apply for other funding opportunities. Thriving Southland is open to working with Environment Southland on further joint funding bids going forward.
11	Jenny & Terry McNamara Submission states it is an updated version (see red highlights) but this is the only submission received.	 Flood protection scheme (Eastern Southland catchment) – submitter lists the following issues/concerns: Gore stopbanks must be raised to protect town from future flooding and should be immediately surveyed to ensure pipes have been sufficiently bolstered; Riverbed dredging – needs to be ongoing priority. This was meant to begin early 2021, but to date this has not happened. Why? riverbank tree removal – some trees were removed from the stopbank along River Street traffic bypass, but nothing else. Why? bolstering of the Waikaka Stream bank on true right alongside Hamilton Park needs to be a priority to stop further erosion; When flood disaster is looming, farmland must be sacrificed before the towns when there are no further remedies to avoid town inundation; existing heights of the SH1 road bridge main trunk railway bridge of concern, as they are prone to flooding and damage. If stopbanks are raised the two bridges must be raised accordingly; consider digging another channel for the Mataura River to pass through East Gore area around Churchill Street, which would meet up with existing river near oxidation ponds. This would result in some houses being demolished and residents relocated.
176	Brian Rance	Catchment works - disappointed in the narrow focus on river catchment works; should also be involved with/include climate change impacts, deteriorating health of water bodies and declining health of many indigenous ecosystems and species. Flood protection: Wants to see more nature-based solutions. More holistic approach to riverbed management. Increased consideration of flood impact on indigenous ecosystems & species. Policy & planning Continue to implement the ES SLWP and ensure funding for implementation. Continued regional leadership in CC issues. Support other regional environmental planning initiatives.

No.	Name	Submission
		Biodiversity Maintained or increased staffing levels. Environmental Enhancement Fund maintained or increased. Increased improved biodiversity information (regional inventory, monitoring, info to landowners regional lists for taxonomic groups). Increased QEII support. ES leads by example (partnerships, expand lower Mataura enhancement project). Biosecurity Continued funding of weed & pest (inc marine) control. Proactive involvement in future incursions. RPMP produced in this LTP term. Land use change Proactively planning for major LU changes to reduce adverse impacts.
43	Wendy Joy Baker	Flood protection infrastructure – submitter is undecided on option. Questions what value she gets for rates paid at present and asks what specific things ES has done in Nightcaps over the past 7 years. Nightcaps – submitter suggests: Wairio Stream edge is enhanced in McGregor Park for bush walkers (see attachments); there is more pest control (possums and ferrets).
206	Bertram Hammond	Would like to see another option/view for Investing in flood protection. Increase in rates — expresses concern regarding the potential increase in rates proposed by Environment Southland and how disappointed he is am in the short notice having only recently heard about the proposals. "As a pensioner, the current cost of living already places significant stress on my financial situation, and any additional burden would exacerbate this hardship. On a fixed income, every expense requires careful consideration and budgeting. Despite our best efforts to manage costs, the rising prices of essential goods and services continue to strain our resources.

No.	Name	Submission
		The prospect of increased rates is daunting and threaten our ability to meet basic needs. In light of these difficulties, I kindly request that the council carefully reconsider the proposed rate increase and explore alternative solutions to address budgetary needs while minimizing the impact on vulnerable members of the community, such as pensioners."
207	Dave Riddell	Flood protection infrastructure - would like to see another option/view for Investing in flood protection. Disagrees with the proposal to change to one Flood Protection Infrastructure Rate based on capital value. While it is argued that the whole
		community benefits from flood mitigation/protection individual catchments have different risks and different benefits from schemes. Implementing a single rate across the province is socialistic in that areas of higher risk are subsidised by lower-risk areas.
		It also disadvantages properties with high capital value but not necessarily any better means to pay. Loading commercial properties with high rates inevitably trickles down to their customers/consumers.
		Shareholding in South Port NZ Ltd - has mixed views about the sell-down of South Port shares. On balance is opposed as he sees the Regional Council as custodians of the shares for the people of Southland. An alternative investment comes with its own risks and costs.
		Council Operations – does not see any mention of an attempt by Council to prune its operations in the plan. In the 1990s the Council employed circa 50 staff and today the number sits at around 4 times that number. Quite frightening. In the current recession it is time to cut expenditure not propose to increase it.
216	Michelle Fraser	Flood protection infrastructure - Would like to see another option/view for Investing in flood protection.
		Agrees with the plan to create a single new Flood Protection Infrastructure Rate to replace 140 catchment rates.
		Opposed to moving the Biosecurity and Land Sustainability Rates to the General Rate based on the capital value. This rate should have nothing to do with the value of someone's house.
		Opposed to an increase anywhere in the vicinity of \$200 per annum for the foreseeable future for Environment Southland Rates is NOT OK in this current economic environment.
		Comments that ES needs to look at current spending and ways to curb it.
		<u>Fees and Charges</u> – Expresses desire for ES to keep a lid on expenditure in these difficult financial times. Everyone and every organisation has to tighten their belt in tough financial times and local bodies should be doing this too.

No.	Name	Submission
		Communication - In the proposed plan it is stated that individual ratepayers will be notified if they will be having a large increase in rates. I believe we will be one of those ratepayers and I have not received any such notification. This is not satisfactory. In addition, I am having extreme difficulty understanding your pie charts and statistics. I would like to know what the exact impact will be financially on my household.
219	Steve Mear	Increase in rates - submitter objects to the flippancy of the intention to indebt future ratepayers with no consideration of their economic situation let alone the global fiscal environment of the moment. Advises Council to live within your current budget and maybe cut costs from the top down.
220	Laurance Paterson	No comments given. Will speak to submission.
199	Federated Farmers (Jason Herrick)	 Rates and Expenditure - recommends that Council: consider all proposed projects in the LTP and prioritise only those that are essential, to reduce the overall rate increase. exercises responsible governance and revises its LTP budgets to constrain expenditure increases to no greater than the rate of inflation over the 10 years of this LTP. It should be noted that any form of rate or user charge (to fund that expenditure) will impact on rate payers and ultimately the regional and national economies. Regionalisation of Rates - strongly opposed to regionalisation of rates and asks Council to reconsider this approach.
		 Uniform Annual General Charge (UAGC) – recommends that Council: should increase the UAGC to fully use the UAGC mechanism at 30% of the total rates income; detail the specific activities/services in the R&FP which the UAGC covers to provide transparency for ratepayers. Proposed option for rating Flood Protection and Infrastructure
		Concern raised around Council's approach to community engagement. Considered railroading approach. We propose two options for the Council to consider under which Catchment Liaison Committees maintain their budgetary oversight with catchment reserve funds remaining within the catchment:
		 keep the status quo – no change to current system; UAGC component plus targeted rate applied per catchment/class - all ratepayers in Southland region pay a portion through the UAGC (which is maximized to the full 30% allowed), and ratepayers within catchments pay a targeted rate based on catchment or class. This money remains within the catchments with oversight by the Catchment Liaison Committees.

No.	Name	Submission
		Recommends that Council: • delay the impact of any changes to the Flood Protection and Infrastructure rate for a minimum period of one year following LTP adoption. • Abandon the 'proposed option' and opt for the status quo or a UAGC + targeted rate for funding flood protection and infrastructure.
		<u>Fees and Charges</u> - Noted that significant increases are proposed. Has concerns that these and rate rises will put farmers in a difficult financial position. SFF have questions about the details of how fees and charges will be calculated.
		Recommends that Council_constrains all increases relative to fees and charges to account for actual costs.
		Revenue & Financing Policy - Recommends Council: • ensures that budgetary oversight is maintained for Catchment Liaison Committees as these committees are the experts on their local area. • ensures that any funds held in reserves by Catchment Liaison Committees remain within those catchments and that the Committees hold jurisdiction over how the funds are spent.
		Policy on Financial Reserves - submitter opposes the proposed Policy on Financial Reserves. We have concerns regarding the catchment reserves and the absorption of these funds into a central pot (albeit to be used for the same activity but on a less specific scale). The Council should not be proposing any changes to how reserves are managed/distributed until it has confirmed its rating system.
		 Significance & Engagement Policy - Recommends that Council: look to other councils for good examples of Significance and Engagement Policies that encourage the collaborative approach and develop a policy that references and uses examples and context of Southland. Carry out checks to ensure that the policy aligns with the wording of the Act to provide clarity and ensure that interpretation and meaning of phrases are not confusing to ratepayers.
		<u>Plan Change Tuatahi</u> - recommends Council delays adoption of Plan Change Tuatahi which is currently scheduled for notification before the end of this year until more clarity on freshwater management is provided from central G=government.
237	Groundswell Western Southland (Sue Allison)	Bureaucratic system - Submitter questions bureaucratic system, staffing levels being unsustainable if the wage bill is \$21M and the rates revenue is \$23M pa. Submitter comments that continuous modelling, consultant costs and specialist's takeaway from a common-sense approach. The 'gravy train' needs an overhaul.
		The public are heavily stressed due to the recession and could be spared angst if a back-to-basics common sense approach was used.

No.	Name	Submission
		Southport shares – the investment has had varying results over time, if your proposal is to sell down shares to 51% and re-invest with public consultation, we support this.
		<u>Climate change</u> – The continuous narrative must be questioned. It is a controversial and complicated topic. What is the cost of this to the Southland ratepayer – is there option that further consultation on climate change be carried out?
		Rabbit control rate – ES states this is contracted out, we question at what cost and what are the contractor's targets and fees?
		<u>Fees and charges</u> – Concerns about a double dipping scenario as it appears that staff get paid to do a particular job and the ratepayers pay multiple times,
		Infrastructure Strategy – Infrastructure and strategy within the LTP has a crossover effect that's difficult to breakdown this section.
		Significance and engagement policy also crosses over with the other elements.
		Representation review - Asks if it is possible during the review that ES delve deeper into their staffing within Council as well.
319	Groundswell Western Southland	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
	(Chantel Marshall)	Capital value rating - the submitter is opposed to proposal to move rates from Land Value to Capital Value.
		 Question staff required and believes a business analysis would identify cost-cutting areas. ES need to go 'back to basics' and 'common sense'.
		Request ES delay draft LTP for no less than 12 months as indicated by Central Government.
		The submitter has 208 signatures in support of their submission.
263	Judy Scott (Geoff Scott speaking)	Hold on LTP – Submitter suggests LTP be put on hold for a year as everyone is struggling financially.
	Speaking/	Central Government is making staff cuts, ES should be doing the same.
294	Christine Bogers	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.

No.	Name	Submission
		The submitter strongly disagrees with the LTP proposals, particularly noting;
		 Extremely poor communication of the impact of the changes on all ratepayers to the ratepayers; Reduction of the Uniform Annual General Charge to be absorbed by those with higher capital value;
		The proposed debt increase that will be "the nail in the coffin for Southland's economy";
		High ES staff numbers and budget increases .
300	Shona Stewart	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		<u>Capital value rating</u> - the submitter is against the proposal to rate on Capital Value and believes that those that can, will pass on their increased costs to the consumers.
		Consultation - submitter has concerns about the lack of consultation and lack of people's understanding on the proposals to be able to make an informed submission.
		The submitter suggests with the country in recession, flood protection focus should be on logical solutions such as gravel extraction from rivers.
314	South Caitlins Charitable Trust (Paul Duffy, Trustee)	Flood Protection Infrastructure - supports the preferred option of increasing operating expenditure by \$2.3m per annum, to be funded by a proposed new Flood Protection Infrastructure rate.
	(raul bully, flustee)	<u>Targeted rabbit control rate</u> - submitter supports the work of the Southern Pest Eradication Society being funded by a targeted rate.
316	Russell Cook, Cook	Flood protection infrastructure - submitter does not agree with the proposal for \$2.3m per annum increase operating expenditure on flood
split with CCS	Farming Co Ltd	protection work noting it is neither required nor sustainable.
		The submitter notes that
		• Farmers and farm support industries and general ratepayers are not financially in a position to go along with Local councils plans.
		• ES should look internally at the number of staff and how they are contributing" People outside your organisation think that you are an organisation that is overstaffed, overpaid and underworked. Rightly or wrongly that is a widely held belief".
318	(LATE) Josh Cumberland	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with the proposals for flood protection.

No.	Name	Submission
		 Use \$25m reserves to do urgent work to level 3 only. Publish all river-related reports to the public. Focus on key areas for gravel extraction. Stop using Glyphosate in riparian weed management.
321	(LATE) Otatara Landcare Group (Richard Johnson, Chairman)	 Flood Protection Infrastructure - Submitter requests: funding be allocated to assessment of nature-based initiatives for all major Southland rivers. the first nature-based initiatives are implemented during this term of LTP. Biodiversity Concerns - would like to see biodiversity reinstated as one of the 'Big three issues' for ES.
		 LTP Funding - Submitter recommends: increased efforts to improve water quality and quantity in the Öreti River catchment; increased management and restoration efforts in the New River Estuary; increased monitoring of habitat condition, water quality, sedimentation and other environmental parameters in the New River Estuary; increased efforts to identify and appropriately manage all leaky soil zones on all farms; the funding available to support environmental groups increased; funding for established successful projects supporting regionally important projects (including the OLG Bushy Point project) to be available for three-year periods; increased technical support to groups. increased monitoring of ecological outcomes and project effectiveness; funding and other support for a Predator Free Bluff to Omaui area. Note this should be considered the first stage of a larger project that would progressively expand to 1) sandy and Otatara and 2) Tiwai Peninsula, Waituna Wetlands and Awarua wetlands.
323	(LATE) Ken Buckingham	Flood protection infrastructure - Would like to see another option/view for investing in flood protection. Submitter: does not agree with the proposal 'ratepayers simply can't afford'; disagrees with the proposal to move from Land Value to Capital Value; considers shareholdings in South Port should be retained; considers targeted rabbit rate should be maintained.

No.	Name	Submission
58	Predator Free Rakiura	<u>Predator Free Rakiura</u> – submitter thanks ES for its ongoing support of and commitment to Predator Free Rakiura.
	(Darius Fagon and Paul Norris)	Submitter supports the planned work on the next Regional Pest Management Plan and its engagement with ES on the development of the document.
		Submitter notes that consultation document does not offer substantive detail in relation to ES' commitments to biodiversity and biosecurity work and asks that consideration be given to ES beginning its planning for developing a biosecurity border and pathways plan for Rakiura Stewart Island.
		Submissions not being Heard
01	Brian Nicholson	Flood protection infrastructure – preferred option is indicated.
		South Port - retain majority shareholding in South Port:
		 do evaluate diversification. protect proceeds/name them as a strategic asset as current shareholding South Port.
03	Neil Kilby	Rates - Whilst submitter respects the work undertaken by the ES and the challenges faced, he objects to the proposed rate increase. He notes his Otatara property is scheduled for a 53% rate increase and during a time of financial hardship and touch economic climate, he considers "asking for a 53% increase is unfathomable". He also states, "basing this off the value of a property is also flawed". There may be a need for more flood protection "but now is not the time be so cavalier with your rate request".
06	Murray Gill	Submits flood protection and river work maintenance to be the cost of the individual farmers that it directly affects, not the overall ES ratepayers.
		Agrees to a general rate based on capital value. However, consideration should be given to having a different rate to residential landowners who do not have income from their property.
		Fees charged by ES – it is too expensive to deal with ES. Builders and general trade people charge maybe \$80ph, but ES \$180ph.
		Meridian/Waiau catchment – the cost of maintenance of Waiau River and flood banks in Waiau catchment should be responsibility of Meridian. Submitter believes that Waiau catchment ratepayers receive payment from Meridian, which is used to discount rates to ES. Also comments If Meridian is prepared to relinquish its water right to the catchment yes maybe, otherwise no. The Waiau catchment ratepayers are entitled to the Meridian compensation payment alone.

No.	Name	Submission
		Changes to Resource Management Act – the Long-term Plan should be taking this into account and factoring in Labour savings in the budget. Asks that ES consider postponing plan until full implications are clear.
		Borrowing – do not burden province's future. States "If we cannot afford it now out of cash income, how are we expected (to) afford repayment of loans and ongoing cost of running ES in the future". Comments that Councillors who represent ratepayers need to push back on Government inspired initiatives unless 100% funded by Government.
		ES rates rise – ES needs to show responsibility towards inflation and not treat ratepayers as a cash cow. Like other government departments are doing in cutting costs, ES can do the same without cutting services to ratepayers and Southland.
07	Anita Erskine	Submitter likes the idea of improving flood warning and river information but feels the region cannot afford to go into debt over the next 10 years to a predicted \$73M, as proposed.
		Submitter has concerns over the rates increases, and battles to understand how rates will go up by an average of 23% when she has not talked a person that is below that figure. Increasing rates at such an alarming rate is not feasible for ratepayers. Notes that all sectors are having to cut costs and ES will have to do this also. ES needs to look at becoming more efficient.
		Questions why ES cannot get consent to remove gravel from a number of larger rivers in the Southland region. The gravel could be used on projects near the area of extraction, save ES on cost of cartage or sold to offset the cost of some flood protection projects. Instead, ES allows water to flow freely, and the gravel builds up in the middle of the rivers resulting in water spreading out over farmland.
		ES needs to stick to its approved budget, and not keep going back to ratepayers demanding more money through rate rises. Ratepayers cannot afford the rate rises proposed in the Long-term Plan.
08	Philip Golden	Submitter supports the work done by the Southern Pest Eradication Society and notes it is doing an excellent job.
		Note that the LTP mentions the Society has been operating for two years but believes it has been operating since around 1996.
12	Tina Jackson	Rates increases - submitter objects to rates increases happening now. Suggests waiting until it is known what work is to be done, in three years time.

No.	Name	Submission
13	Barbara Morrison	<u>Targeted rabbit control rate</u> – submitter notes Pest Eradication Society has been successfully keeping rabbits under control since 1996. Possums and hares are also targeted.
14	Lindsay Ballantine	Flood protection infrastructure – preferred option is indicated. Comments it would be good if it was delayed until prices for sheep and beef improve.
		Fees and charges – marked for feedback, but there is no comment.
15	Jessie & Ben McMaster	Rates increases - submitter has concerns on the potential rates increases as they are extremely significant for them i.e. 80%, and comments that when increases are significant, every ratepayer should be mailed directly to be made aware of it, and not find out by chance.
		Flood protection and any river costs - must be at the cost of individual farmers that are directly affected, not overall ES ratepayers.
		<u>Fees and charges</u> – submitter asks why ES charge-out rates are more than double a tradesman. ES should cut costs first and foremost i.e. unnecessary jobs and ways to work smarter.
		Meridian/Waiau River – the proposal is not realistic. It is crippling.
16	Colin Hitchcock,	Capital rating value – supports the move to capital rating value as it will help spread the burden.
	Waimatuku Catchment Liaison Committee	Maintenance – opposes regionalising off maintenance as small catchment would miss out on share of monies to bigger catchments.
		Reserves – opposes use of reserve/disaster accounts to balance ES books.
		Rate increases – has concerns that LTP has not comment on affordability of proposed rate increases.
		Flood protection – ask that flood planning is paused until there is more consultation with all communities i.e. roadshow.
17	Bruce Campbell	Rate increases – submitter opposes rate increases. Revise budgets to fit current income.
		Flood protection plan – submitters comments on various aspects of what causes a river to flood. Questions why Fish & Game has an input into the region, as it doesn't financially contribute.

No.	Name	Submission
		Weed control – concerns at the number of nodding thistles, broom and gorse growing along Cattle Flat above the hut that ES is responsible for. Comments also that it is not hard to find gorse and broom along all rivers in the Southland province.
18	Donna Bruce	Fees and charges – submitter suggests that charges are left as they are, and to work within the budget already in place.
19	Nathan Cruickshank	Flood protection infrastructure – preferred option is indicated.
20	Paul Welsh	Fees and charges – submitter comments that all councils need to cut down expenses, too many managers.
21	Quin Arthur	Flood protection infrastructure – preferred option is indicated.
23	Gretchen Boyd	Fees and charges – submitter asks that the ES rates invoice is included with the City Council rates invoice.
24	<u>J Fredric</u>	Flood protection infrastructure – preferred option is indicated.
25	Michael Freeman	Submitter comments that Southland does not have a dedicated suite of long-term groundwater quality monitoring bores. It relies on the current method of obtaining groundwater quality data from a large number of privately owned bores.
		He further comments that "long-term management of groundwater quality and the connected surface water quality requires robust accurate long-term information. The current monitoring of a large number of private bores that are often temporary, poorly installed and poorly located is not fit for purpose. There needs to be a long-term strategy of investing in a regional network of bores that will allow the current and future generations assess trends in groundwater quality and have a robust basis for developing policies".
26	David Bennett	Significance and Engagement Policy - submitter asks why do Māori have more rights than other ratepayers and don't have to pay rates on Māori land?
27	Murray Fraser	South Port NZ Limited Shareholding – submitter supports the sale of shares.
28	Katie Allan	Flood protection infrastructure – preferred option is indicated.
29	Mike Kollat	Fees and charges – submits comments that with the cost of living and everything going up, people can't afford it.
30	Alistair Calvert	South Port NZ Limited Shareholding – submitter supports the sale of shares.

No.	Name	Submission
31	Joyce Kolk	Flood protection – submitter supports flood protection proposal.
		Rates increase – submitter supports the rates increase.
32	Stephen Martin	Flood protection infrastructure – preferred option is indicated.
33	Allan Marshall	<u>Targeted rabbit control rate</u> - submitter supports the Southern Pest Eradication Society model and the rate charged.
34	Adele McGarry	Fees and charges – submitter comments that Council needs to look at how much it is increasing the rates by, as people can't afford it.
36	Steve Gamble	Flood protection infrastructure – Other option is indicated. Submitter comments:
		- that figures are misleading;
		- changing to capital value ratings is an unfair value system e.g. wealth tax.
		- spending needs to be re-priortised;
		- stop wasting funding internally, put funding into contractors hands.
37	George Harpur	Submitter comments on the rate increases since 1997.
		The submitter also comments on the little work being done on the Tuatapere Domain flood protection bank on the Waiau River. He states "some
		twenty-five years ago after a lengthy period of consultation we got traction on removing a gravel bar opposite the Tuatapere water treatment
		plant, well almost, as when the work was a little more than half done a certain person from outside of any of the concerned parties called a
		halt to the work, hmmmm. This issue is or should be back on the urgent agenda as this build-up of gravel now extends further downstream
		and is creating more pressure on the water tank area".
40	Lindsay Strudwicke	Consultation process – submitter comments the consultation process is flawed. The Revenue and Financing Policy stated that every ratepayer
split with	,	would receive a letter, but no one has. The drop-in meetings were not well advertised. Asks what percentage of ES ratepayers will be getting a
CCS		decrease in rates and what will be their 10 year rating forecast.
		Detections and provided white states "arting in success the old payor exceeding letters" "Our rates and interest against the state of t
		Rates increase – submitter states "rating increase should never exceed inflation". "Our rates, plus interest compounding over the next 10 years increasing over 100%." "New Zealand is broke so where will the government grant be coming from and what cost to the ratepayer, including
		Environment Southland staff". Comments that ES should not be asking for any increase.

No.	Name	Submission
		Infrastructure Strategy – submitter comments that ES intends to build infrastructure that is generally not required. Further comments that ES has taken bird habitats away, allowed farming to consume areas that allowed flooding thus slowing rivers, dammed rivers, wiped out vegetation in rivers and stopbanks and even blowing stopbanks when it suited.
		Questions why have rivers been allowed to be hindered by excess gravel?
		<u>Staffing</u> – Questions why is ES not cutting back on all excess staff, as staff, vehicles, cameras, videos, flights, uniforms etc have all increased at Southlander's expense?
		Rating on capital value – submitter comments this is only another way to shuffle the situation to make it more profitable for ES and hinder once again, the ratepayer. Does not agree that the rate forecasted will be more in line, more equal.
		Submitter further comments that ratepayers are already rated on capital value through the District Council or Invercargill City Councils, then there is the insurance on those buildings and now ES wants to double dip. Asks what is being provided in extra quality guaranteed services, to include ratepayers' buildings?
		Submitter considers that ratepayers are not being listened to and asks for an immediate stop to the Long-term Plan and all rate increases. It needs to remain as status quo for at least the next year.
41 Split with CCS	Shona Strudwicke	Submission is identical to submission 40 – see above.
45	Adrienne & Ronald Crispin	Flood protection infrastructure – submitter asks that all aspects of flood planning and infrastructure is delayed for at least a year.
	Chispin	Rates increases – submitter does not agree to the 23% rates rise.
46	Peter Hogg	Flood protection infrastructure – submitter considers it is "crazy" to put up rates in these economic times adding to inflation.
47	Graeme Muldrew	Submitter has concerns about funding impacts on him as a retired person with a lifestyle property. He cannot make ends meet, costs are going up and income is going down.

No.	Name	Submission
		<u>Capital value rate</u> – submitter contests capital valuation for setting rates, which is applied to total area of the property. Of the 110 acres, approximately 75 acres is in virgin native forest. This is non-productive land so the submitter considers it should not be subject to any rates. The submitter agrees to pay a rating on production land.
		Gravel extraction - submitter agrees with the statement on cutting out and speeding up the consent process for gravel extraction in high-risk areas to confine water flows.
		The submitter asks that consideration is given to the non-production areas on his property and for other such as his.
48	Natalie Carran	Flood protection infrastructure – submitter considers worth of property is irrelevant and should not be measured that way. People cannot afford the proposed increase in costs and suggests that ES could do an audit within the organisation and find out where wastages are and make cuts where required to fund the project.
		Target rabbit control rate – submitter states she has never had anyone target their rabbit problem. Suggests a review.
49	Kate Briggs	 Vehicles – submitter has commented on seeing multiple brand new Ford vehicles when driving past ES and has heard that more are coming. The submitter asks: Why does ES need brand new "top of the range" Ford vehicles; and Why is there a need for such a big fleet?
		The submitter also makes a number of unsubstantiated claims.
50	Grant Kennedy	Flood protection infrastructure – submitter suggests that instead of raising flood banks, to dig out gravel instead. Submitter also asks what will happen to the bridges in a flood if the flood banks are raised.
		Staffing - submitter asks for a review of staff – how efficient they are and how many are needed? Asks what is the wage bill each month?
51	James Andrews	Targeted rabbit control rate – submitter is happy with the targeted rate.
52	Jill Henning	<u>Proposed rate increase</u> – submitter objects to the use of capital value for rate setting. Using capital value as a rates vehicle would be tantamount to theft.

No.	Name	Submission
		Submitter comments that she is a super annuitant living on a pension only. She sees no cutting back or frugality from ES, and it is even proposing staff increases. The submitter applauds ES for wanting to do flood protection, but it needs to cut its cloth accordingly.
53 – split with CCS	Laura Pope on behalf of NPHS Te Waipounamu, Health	Flood protection infrastructure – submitter strongly supports proposal and agrees this investment will play an important role in reducing the impact of flooding on critical infrastructure.
	New Zealand Te Whatu Ora	Infrastructure Strategy – submitter commends ES on acknowledging that the region is experiencing an increase in climate-related events and is looking at the current infrastructure and the way it is funded. Submitter agrees that using modelling to assist with regional planning will ensure the current flood protection assets can withstand scenarios to an agreed level of protection.
		<u>Recreational water –</u> the submitter supports the improving of results and science surround recreational water but asks that ES consider improvements in resource and management of recreational water.
		<u>Local iwi</u> – the submitter supports the involvement and partnership with local iwi within Southland and the development of the Charter of Understanding.
		<u>Air quality</u> – the submitter encourages ongoing community education regarding requirements of the Regional Air Quality Plan for Southland and ways in which individuals can contribute to improving air quality.
56	Harbani Hurst	Flood protection infrastructure – Submitter has indicated another option and states "do not increase rates anymore".
		<u>Targeted rabbit control rate</u> - suggests not only rabbits but stoats should be included and states "the money control them is already there".
59 – split with CCS	Christine Whybrew for Heritage New Zealand Pouhere Taonga – Split with CCS	<u>Infrastructure Strategy</u> – submitter supports the provisions of the LTP that provide for conservation of historic heritage within Southland, including development of catchment plans.
		Requests that any works which relate to historic places should be assessed for potential impact on archaeology to ensure an archaeological authority is obtained if necessary. Recommends consultation is undertaken between ES and HNZPT for projects that may affect places or areas entered on the NZ Heritage List.
		Notes that ES is aware that archaeological authorities may be required for certain projects so that any costs and time associated with this are anticipated and included in project budgets.

No.	Name	Submission
61	Henare Baker	Fees and charges – comments that they don't believe council should not be borrowing at this time.
		Concerned that Council is asking for more cash from people struggling already, suggest cutting spending elsewhere but save some money for future activities when the time is right.
		States climate change and rising sea levels is a joke so no action needed there otherwise banks wouldn't be giving 30-year loans on coastal properties.
		Infrastructure strategy – comments that Council should hold back or slow the work needed at this time or make some cuts elsewhere.
62A	Susan Ricketts	Flood protection infrastructure – submitter lists a number of concerns: - Where has the rates money gone to already be funding flood protection? - Will the rates increase actually be used for the flood protection in all of Southland region? - Some oppose the increase, as it is presumed Invercargill's flood protection needs come priority over the rest of Southland; - Council projects quite often cost a lot more than first thought, which may lead to another increase. - How soon will the Major Flood Work and Civil Defence standards be actioned?
		Comments that ES needs practice to be more "frugal".
62B		Additional information was supplied asking that Councils need to consider shortening the Long-term Plan by 4-5 years to work in with the changing economy and climate, as this would give a more accurate view on projects and make it easier to manage funds.
64	Cyril R Deaker	Council expenditure - submitter notes that they want to see value for all monies spent by Council.
		Consultation process - submitter notes a need for more time to assess major proposed changes - several months and minimum of 90 days.
		Council process – submitter has perceived a big lack of transparency over the decades and suggests that this culture has to change.
		Staffing – submitter notes that they are astounded by the numbers and generous pay packets. States that many ratepayers are trying to live on \$30,000-50,000 a year.
65	Christine Uhlmann	Increase in rates – submitter does not agree with rates increase. Indicates that people are struggling to survive and pay bills.

No.	Name	Submission
		Council expenditure – submitter notes the following related to expenditure:
		 is surprised that we can spend \$500 000 on killing one stoat but there is no money for education, health, etc. surprised at the number of new ES new trucks and big vehicles seen on the streets. Suggest Council starts saving here and not bill the ratepayer.
66	Gregory Kent	Flood Protection Infrastructure - submitter supports the proposal for the new \$2.3m Flood Protection Infrastructure rate based on capital value.
		Submitter proposes a rate abatement or reduction on infrastructure such as cow wintering barns or plant used in industry to treat waste before it is returned to the environment, or where the land rated is used as a retention ponding area to reduce flooding in other areas.
		<u>Capital value rating</u> – submitter supports a move to capital value for the Flood Protection Infrastructure rate.
		<u>Catchment Liaison Committees and reserves</u> – Submitter supports the retention of Catchment Liaison Committees and existing reserves applied to respective catchment areas.
		Debt for CAPEX - Submitter supports the funding of new flood protection infrastructure through borrowing, with repayments from all ratepayers.
		South Port – Submitter supports the proposal for a sell down of South Port to 51% to reduce risk concentration and suggests potential reinvestment in Port Otago.
		Targeted Rabbit Control Rate – Submitter supports the continuation of targeted rabbit control rate. Satisfied with current service.
		Council expenditure – Submitter advocates for increased transparency and accountability in all Council expenditure.
67	Ulva Goodwillie	Rates increase – Submitter opposes that Stewart Island/Rakiura is included in discussions or planning for rates increases related to Southland's ageing flood protection network.
		Flood Protection Infrastructure – Submitter expresses concerns about the lack of a clear plan for flood protection infrastructure investment.
		Marine Fee – Submitter notes that Environment Southland has been receiving gratuity from cruise ships entering Stewart Island waters for over 10 years, with a policy that a major proportion of this money should be returned to Stewart Island for environmental upkeep and wharf maintenance. However, there's no clear indication of this in the annual Financial Statement. Request for an analysis of the coding of cruise ship income to understand why it's not being returned to the Rakiura/Stewart Island Ward.

No.	Name	Submission
		Suggests using cruise ship income, if backdated 10 years, to support Undaria control for the protection of Rakiura marine habitat.
68	Rob Highsted	Flood protection infrastructure expenditure – Submitter supports the preferred option. Submitter suggest: that the money needs to be spent on the actual work, not Health and Safety, consultants, and administration; contracts are given to lean operators with accountability.
		<u>Council expenditure</u> – submitter suggests that there is too much spent on overheads and administration.
69	Roger Thomas, Ione Farming Ltd	<u>Targeted Rabbit Control Rate</u> – submitter notes they are happy with the rate and service they receive. This allows the submitter to target other pest species.
71	Brenda Stevens	Flood Protection Rate – submitter opposes the new flood protection rate. Wants to halt the LTP until the economy improves to reduce pressure on families. Suggests using reserves for floodbank maintenance to level 3 standard only.
		Suggests that councillors "need to get out amongst the public into the real world."
		Other feedback – wants to hear more from civil defence, suggests using ES reserves (\$20M) to get up to standard so don't have a repeat of the inadequacy of the Hawkes Bay civil defence.
72	Graham Butcher	Flood protection infrastructure – submitter supports the preferred option.
		Acknowledges that the flood protection works benefit all Southlanders to varying levels.
		Suggests there is some justification in spreading the cost more equitably over ratepayers and that those who benefit more should pay more.
		Suggests retaining the current rating system but increasing the UAGC to take account of the region wide benefit of better protection.
		Opposed to basing any new rating system on capital value. Questions that for the new capital flood protection works that a proposal to spread the debt over 25 years wouldn't cover the lifespan of the new works and that there would be significant overlaps in benefits and costs. Submitter concerned that any delay/deferral of new works would lead to increased costs. Also concerned about the increasing debt levels and suggests that alternative funding options should be reviewed including using ES investments and shareholdings. With government contributions available, for

No.	Name	Submission
		now at least, then it would make sense to use this capital to offset construction costs. To not do so implies Council believes investment returns are better than returns from better flood protection.
73 – split with CCS	Matt Couldrey	Flood protection infrastructure — submitter supports the preferred option. Acknowledges that the floodbank/flood protection works are critically important; but so is the need to reduce our emissions as a region. The submitter wants ES to advocate for a mindset change in transport options that will reduce emissions. Emissions reduction — Submitter would like to see more investment in emissions reduction (example given of land use changes). Suggests we must take the initiative and reduce our emissions through every and all means necessary, e.g. investment in reliable public transport, passenger trains,
		more regular freight trains (moving some of our reliance on truck transport onto trains & coastal shipping). Acknowledges that ES doesn't have control of these. Recommends advocacy.
74	Stuart Clearwater	 Submitter: does not support the new flood protection rate; does not support the proposal to move the biosecurity and land sustainability rates from land value to capital value, spreading the cost of flood protection infrastructure region wide; opposes rating change to capital value; comments on ES insatiable demand for rates yet he receives no benefit. Waihopai floodbank is wrong due to flow obstructions. Climate change is just nature. Need to clear Southland waterways. Rates are too high, too many staff and consultants.
75	Te Anau Downs Station (Peter Chartres)	Flood Protection Rate – submitter opposes the new flood protection rate. Submitters property is the only one in river catchments and pays for all flood protection and repair work. Even though completes this work rates are increasing and suggests that they do not get any practical value from ES and questions why they are not getting a rates reduction. Flood risk — Submitter suggests that flood risks at Te Anau Downs (as well as across Southland) could be significantly reduced if farmers were allowed to remove gravel build up from rivers.
		<u>Capital Value for rates</u> — Submitter opposes the proposal to move the Biosecurity and Land Sustainability rates from land value to capital value. Submitter has voluntarily retained wetlands at Te Anau Downs Station alongside fencing waterways and carrying out riparian planting.
		Region-wide flood protection funding – Submitter opposes the proposal to spread the costs of Flood Protection Infrastructure across the region.
		Submitter suggests that they may be supportive of spreading the cost across region if flood protection work was undertaken at Te Anau Downs Station.

No.	Name	Submission
76	Hollyford Museum Trust (Peter Chartres)	Flood Protection Rate – submitter opposes the new flood protection rate. Submitter indicates that following meetings with Environment Southland and Department of Conservation the Hollyford Museum Trust will need to pay for any flood protection work itself.
		<u>Capital Value for rates</u> – submitter opposes the proposal to move the Biosecurity and Land Sustainability rates from land value to capital value. Submitter indicates that the Capital Value of the Hollyford Museum Trust property needs to be corrected following damage from the February 2020 floods. The Hollyford Museum and Camp has not been operational since then.
		Region-wide flood protection funding – Submitter opposes the proposal to spread the costs of Flood Protection Infrastructure across the region.
		Submitter suggests that they may be supportive of spreading the cost across region if flood protection work was undertaken for Gunns Camp in the Lower Hollyford Valley.
78 – split	Karen Broome	Submitter does not support the increase in operating expenditure by \$2.3m per annum for a new Flood Protection Infrastructure Rate.
With CCS		Submitter supports the proposal put forward by the Mataura Catchment Liaison Committee for a delay in future flood planning for at least a year and with the community being FULLY consulted AND given time to discuss and digest information.
		Submitter commented on the submission process believing it was made as difficult as possible.
		Questioned why not adequate modelling and data collection already available within ES and that mother nature was not predictable. Queried the need for repairs and maintenance. Believes climate change is a continual process and that continual climate change scaremongering is akin to gaslighting people. Need to concentrate on getting river bases back to where they originally once were.
81	Wade Devine	Revenue and Financing Policy – Changing How We Rate
		 Supports the proposal to have a new flood protection rate. Does not support the proposal to move the Biosecurity and Land sustainability rates from land value to capital value. Does not support spreading the cost of flood protection infrastructure region-wide.
83		WITHDRAWN
84	Jon Spraggon	Revenue and Financing Policy – Changing How We Rate

No.	Name	Submission
		 Supports the proposal to have a new flood protection rate. Does not support spreading the cost of flood protection infrastructure region-wide.
85	Phil Ryan	Revenue and Financing Policy – Changing How We Rate - Does not support the proposal to have a new flood protection rate. - Does not support the proposal to move the Biosecurity and Land sustainability rates from land value to capital value. - Does not support spreading the cost of flood protection infrastructure region-wide.
86	Brittany Pickett	Revenue and Financing Policy – Changing How We Rate - Supports the proposal to have a new flood protection rate. - Supports the proposal to move the Biosecurity and Land sustainability rates from land value to capital value. - Supports spreading the cost of flood protection infrastructure region-wide.
87	Tina Robinson	Flood protection infrastructure – no option indicated. Fees and Charges/Rates - Submitter asks to stop increasing the rates and fees, People leaving communities due to financial hardship and retirees are barely living as they have to forgo heat and food to pay rates. Constant rates increases are driving people out of communities resulting in less people to pay the rates, please stop this madness.
88	Steve Magi	Flood protection infrastructure – no option indicated. No further feedback
89	Kelsi Hayes	Target rabbit control rate – Pest control is a necessary service, and it needs to continue to be funded, even with the current economic conditions and possibly increased in the future to gain traction in reducing pest numbers.
90	Thelma Froude	Flood protection infrastructure – no option indicated. Other feedback – Submitter suggests using the \$25M in reserves to do urgent work required throughout Southland only to level 3 Fees and charges – didn't know about the changes until now, no consultation given.

No.	Name	Submission
91	Steve Lindsay	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with the proposals and notes Environment Southland needs to 'cut the cap to fit the cloth' and focus on core requirements.
92	Ivan Becarini	Fees and Charges - Do not support rates increase due to: increasing living costs; unemployment; weak economy; not the right time. Look at cutting costs instead.
93	Graeme Dodd	Climate Change – Do not support climate change.
		Stop going on about climate change as its nothing new. Move from North Road office and stop buying new vehicles like a fashion statement.
94	Alicia Watson	Fees and Charges – Do not support rates increase due to Inflation.
95	Katrina Irwin	Fees and Charges – Do not support rates increase due to rates increase for something ES should budget for within the current meandering.
96	Emma Peterson	Fees and Charges – Do not support rates increase due to: • ES needs to be more transparent with what things will cost and what they plan to do; • Contractors are been paid exorbitant amounts and submits ridiculous quotes because ES accepts them; • Work is not been done efficiently in a long lasting way; • Don't understand pest control; • ES not working for the community in these financial times.
97	Maree Wallace	 Fees and Charges – Do not support rates increase due to: People buy land in flood zone for cheaper. The rest anyway pay more rates according to their land value and now we need to pay more on top.

No.	Name	Submission
		We have gone through a flood and will never buy land in a flood zone.
98	Sharon Paterson	Fees and Charges – Do not support rates increase due to: Do not have money and can't afford to borrow more in this climate and might have to sell the farm; Stop investing in more truck, more people and buildings; Take gravel out of rivers and sell it.
99	Barbara McCleery	Fees and Charges – Do not support rates increase due to: Can't afford Fixing the foodbanks should have been maintenance to maintain the foodbanks not spending for dollars.
100	Duncan Jennings	 Targeted rabbit control rate – Support continuing to collect rates on behalf of The Southern Pest Eradication Society. Allows the society to operate and employ contractors to keep the rabbit numbers down in Southern Southland. If we were to lose this service, we would see an explosion of rabbit numbers to plague like proportions like other regions in the South Island
101	Nigel Johnston	Flood protection infrastructure - Support future proofing our flood protection network due to: Can see the benefit to protect private property However, concerned with constant increase in cost in all budget lines. Would like this to be closely monitored.
102	Vaughan Reynolds	 Fees and Charges – Do not support rates increase due to: Environment Southland rates should not be paid by people who live in residential areas as they pay two lots of rates to Southland District council and Environment Southland Targeted rabbit control rate – Do not support this due to: It's a joke and a rip off - never seen pest control on my place
104	Marilyn Parris	 Rates – Do not support rating based on capital value: Rates for our farm would increase by 34% (by\$1665.24) We are a sheep farm in a dairy farming district therefore our land value is over inflated relative to our income and this disproportionately increase the actual monetary value we have to pay when we have minimal environmental impact compared to dairying Unaffordable due to sheep farming is barely generating enough money at the moment to pay everyday bills

No.	Name	Submission
		 Our farm do not require flood protection as: our critical infrastructure and dwellings as well above any level that the Waiau river would ever flood main arterial road past our farm is also well above any level the river would ever flood to. our banks along the river Waiau are mostly and therefore have minimum erosion risk. our waterways are fenced and buffered with riparian zones. We don't have production forestry that could create potential hazards to flood infrastructure We have a significant area of protected native bush incorporating wetland areas that naturally slows overflow into tributaries Even if the two bridges are taken during a massive flood we can still be able to keep our livestock – we have significant farm reserves of supplementary feed We have a significant flat area for a helicopter to land with supplies Self-sufficient for food We have our own water supply and septic tanks Only domestic public infrastructure aside from roading we rely on is power An excessive level flood protection for our area and for rural properties is also not fair or equitable as: We are less reliant on public infrastructure for flood protection than the average urban or suburban dwelling. ES need to factor a land use code similar to SDC as relying purely on capital value rating is disadvantageous to a rural community.
105	Graham Johnston	Rates increase - Support rates increase. Flood protection infrastructure - If preferred option is taken: Need to waive consents for river works etc as this process of consents achieves nothing and is not delivering a service to the ratepayers Burgeoning staff and excessive salaries have got to be worked to deliver repairs and maintenance to ES and catchments NOT propaganda lip service Financial strategy - not for salary packages but for service to ratepayers Climate Change strategy - Really deal with it. Targeted Rabbit control rate - not a huge problem. Infrastructure strategy - not delivering on any of this. Significance and Engagement Policy - Too much talk no action. Representation Review - of what. Data is not required on rivers as this has been done over the 43years I have been here for no result. Action and Service for rating is required.

No.	Name	Submission
106	George Seator	Rates increase — Do not support rates increase due to:
		 Community who chooses to buy, build or live on low-lying flood plain or flood prone area should expect more challenges. Insurance taking the lead here by increasing premiums for "at risk' properties. Promotes the expectation that a property with greater value is more viable business than a less expensive one – and assumes that property owner who has spent far more on improvements must be wealthier and does not consider that this property owner probably has more debt to service. Higher the flood band the more dangerous and damaging when they breach. Money would be better used cleaning out the rivers and waterways – as the amount of gravel build up in the rivers is significant and increases the flood problem. If Fish and Game oppose river cleaning maybe they should be held liable for property damage Nesting birds can live elsewhere – gulls aren't native to New Zealand. Increasing hardship and recession We are forced into making a bad decision without considering other options with proposed new rating plan remain on the status quo. Public consultation needs to be for a period of time not in the eleventh hour. Need to advertise the proposed changes that effect rate payers properly and more widely not just on ES website. The southland express and local papers would be ideal with plenty of advance warning.
107	Francis John Shearing	Flood protection infrastructure – another option indicated.
		Solution – Issue another quantity of gravel consents amounting to 450,000 metres per annum to cover the proposed rate increase.
108 – split with CCS	Graeme A Humphries	Rates increase — Do not support rates increase due to: 25% rates increase would have an enormous and harmful impact on the people of Southland. Growth of councils are unacceptable and unsustainable. Southlanders are under considerable financial pressure due to rising costs etc. The damage to Southlanders mental and physical wellbeing is beyond any perceived wins for the environment. Other comments Does not support "Banning the use of coal in home heating".

No.	Name	Submission
		Prerequisite which is essential for making sound logical and practical policy decisions is absent.
109	Penny Edmonds	Flood protection infrastructure – other option indicated.
110 – split with CCS	Helen Kowalewski	Rates increase – Do not support rates increase due to: Regional climate strategy is based on faulty science as there is no evidence that NIWA predictions are based on fact or are even science. It's insane to commit \$211million in borrowings on loose predictions. Demanding money in the middle of a recession caused by Government policy. Farmers have to keep paying for destructive policies. It appears ES have already decided to over rate us. Stop all this spending stop this now.
111 – split with CCS	Michael Kowalewski – split with CCS	Rates increase — Do not support rates increase due to: We are in a recession and everybody has to trim their budget with many job losses around the country Farmers are particularly hard hit with rising costs. ES needs to make a major downscaling cut all unproductive work — but do not cut stop bank maintenance. You must follow your ratepayer's preferences not NIWA predictions. Flood protection Surprised to see so many weak points (grade 5)- this should have been maintained all along. Solution: Cut the number of total staff to 20 plus 10 digger drivers. Buy 10x32ton diggers & put them on stop banks to continuously go up and down all existing stop banks.
112	Cathy Haira	Would like to see another option/view for Investing in flood protection.
113	Jada Haira-Green	Would like to see another option/view for Investing in flood protection.
114	Joe Haira	Would like to see another option/view for Investing in flood protection.
115	Judah Haira-Green	Would like to see another option/view for Investing in flood protection.

No.	Name	Submission
116	Amika Edmonds- Fowler	Would like to see another option/view for Investing in flood protection.
117	Pinia Edmonds-Fowler	Would like to see another option/view for Investing in flood protection.
118	Anahera Edmonds- Fowler	Would like to see another option/view for Investing in flood protection.
119	Mya Edmonds-Fowler	Would like to see another option/view for Investing in flood protection.
120	Ngahera Edmonds- Fowler	Would like to see another option/view for Investing in flood protection.
121	Craig Coster	Would like to see another option/view for Investing in flood protection. Attended workshop held in Winton. The method of calculation should be done by using the rating method of the 2023 rate demand. All rated properties to be rated in areas covered by Environment Southland. Attending the above workshop was advised that some properties are not rated because it cannot be decided what water shed part properties will drain into. This province was photographed aerially in the late 70s and early 80s and technology is way better now. Property dispersion from Rates - All properties used for producing an income for their organisation because it is giving their group an unfair advantage in competition for contracts in the private sector, rest homes, machinery dealers, Building Supplier, Road transport, Commercial Buildings and Farming. Staff - A review of staffing every 5 years to be done by outside people to be impartial. Fees and Charges - These should be done on an itemised invoice showing amount of time each staff member has done.
122	Rob Kempthorne	<u>Consultation</u> - extremely disappointed on the timeframe available to provide feedback on this proposal around flood protection. Inadequate amount of time and disrespectful to all parties. <u>Flood protection infrastructure</u> - agree in principle for the need to invest in ongoing flood infrastructures but:

No.	Name	Submission
		 No confidence or evidence that ES has gone through any type of analysis or re-prioritisation of existing expenditure; Not acceptable for ES to ask for more money beyond CPI type adjustments without good cause. Have ES thought about what they are going to 'STOP doing'. ES can't do everything, stick to the basics; Rates increases and ES activities over past 10-15 years suggest too much creep and wasteful spending. Rates increase - Asking to effectively double ES income in next 5-10 years is WRONG. ES needs to increase the UAGC aspect of the rates charged and push back on central government expectations unless ES and government shared funding or GST relief etc. Disappointed in the continual expectation that "we'll have to increase rates". You give us little confidence that you're trying that hard to minimise spending in any way. It is positive that you're attempting to even out the share of the burden across more ratepayer's esp. commercial property and not shouldering rural ratepayers with all the proposed costs. But again the argument of "Is this amount of money truly needed going forward in perpetuity? What happens when you've done the necessary upgrades? There is no mention of a reduction of rates afterward.
123 – split with CCS	Troy Fowler	Flood protection infrastructure - would like to see another option/view for Investing in flood protection. Easy gravel consents, or none needed for gravel above the waterline. We need to remove gravel from rivers to protect human lives. Human lives are above all else and I would like the simple jobs done. If done correctly it will not cost anywhere near the amount of increase being asked for Central government has notified out agencies should go back to core jobs, Air and Water testing! Other feedback Climate change is wrong information. There is no rabbit control (told at Otautau meeting) In 1999 there were 3 employees now there are 196 employees. "Sack the slackers"
124	Neroli Molloy	Flood protection infrastructure - Would like to see another option/view for Investing in flood protection. Make the consent process for removing gravel easier. Clear out river mouths so flow is easier. Dig deeper channels so water doesn't rise above flood banks.

No.	Name	Submission
		Too many staff sitting behind desks and not required.
		Other feedback Why do we need shares in Southport – Waste of Money
		Why is there no more pest control, I would have thought was most important to protect our native wildlife.
125 – split with	Lyndon Murphy	Flood protection infrastructure - Would like to see another option/view for Investing in flood protection.
CCS		Would like to see easier gravel removal consents.
		All gravel above the water level should not need a consent.
		ES should go back to core employment i.e. Air & Water testing as directed by central government and relieve excess staff.
		Other feedback
		The information ES is using for Climate control is not correct (it is left-wing).
		Mentioned by ES at a meeting that Rabbit control is no longer happening.
126	Dale Walker	Would like to see another option/view for Investing in flood protection.
		Clear out the riverbeds
		Spend reserves on urgent maintenance to level 3 only.
		This proposal will inflict serious hardship on families and one-income households. People are struggling.
		Halt the long-term plan for one year.
		Other feedback
		Get Civil Defence up to speed.
127	Chris Garrett	Flood protection infrastructure - Would like to see another option/view for Investing in flood protection.
		Too much focus on stopbanks rather than the rivers, their tributaries, and drains. Our local Wairio stream is blocked by willow, gorse, broom. Storm water drains leading to sewerage ponds are black, clogged, and stinking. Properties are flooding with moderate rain because the water has nowhere to go. Do basic work to clear out the waterways, pest trees, and remove gravel reducing the risk of flooding and damage to stopbanks, bridges, etc.

No.	Name	Submission
		Constant increases in rates to pay for ill-informed schemes are not going down well with ratepayers. I understand the model being used by ES to calculate flood risk is a faulty one. I do not support this borrowing while existing infrastructure is ignored. Please wait 12 months to adopt a Long-term Term Plan and allow the government changes on legislation to go through that may impact the LTP and costings. Use this time to clean up our waterways, PLEASE.
128	Judy-Diane Leith	Consultation process - the consultation process has been abysmal. Lack of time given, lack of notice, and poorly advertised with a large portion of ratepayers unaware of the increase involved if flood protection infrastructure is adopted. Why was a full-page notice not put in Autumn Enviro South? Flood Protection Infrastructure - would like to see another option/view for Investing in flood protection. The debt increase forecasted is astronomical and is unreasonable to put this financial burden on people. Why have infrastructure costs not been mentioned before now. Suggest another option to use \$25 m in reserves and do the urgent work to level 3 only. Do not agree with sharing the burden of costs of flood protection when irresponsible decisions by ES allow building in flood-prone areas, allow ponding areas to be drained, and straightening river courses that used to naturally weave slowing their course down. ES as an agency of the crown has a duty of care to the people of Southland, to serve the people and act in their best interests. I recommend ES delay any flood protection rate until a Southland-wide awareness campaign has been carried out properly and within an adequate timeframe, not less than 12 months' notice for submissions. Climate Change - where is ES getting its date for the effects of climate change? Where is the evidence ES is basing its push to renew/create the flood protection infrastructure? And why do you want to do this work with borrowed money? It should not be done without secured funds. I don't agree with council's aspirations to generate climate change action. I do not support Southland becoming a net zero region by 2050 or earlier. NZ has enough trees, bush, and scrub to offset any carbon emissions we may have.
131	Tony & Joanne Carson	Consultation and display of information - tried to review all relevant information on the website regarding what the actual plans and financial forecasting details are for the proposed 10-30 years LTP plans. There was too much information, it would have been easier for ratepayers if the information was bullet-pointed as; • Current State • Proposed upgrades

No.	Name	Submission
		 Timeframes for each upgrade Projected costs
		Contingency planning for flood protection - we believe we need to do what is practicable within budget to protect our people from environmental harm. It's impossible to apply coatings 30 years from now but good to have some assessment management mappings in place.
		Southport Shares - supports retaining South Port Shares as they support loan repayments and help keep rates at a minimum expense for Southland Environmental ratepayers.
132	Abe de Wolde	Flood protection infrastructure - Would like to see another option/view for Investing in flood protection.
		It would be wiser to hold off for at least a year with this increase. This would give more time to agree on gravel management and its financial implications. In the meantime, we should find agreement on what climate modelling to use to determine climate risk.
		Other Feedback
		Trim your cloth. Go 'middle of the road'.
133	Jantje Venekamp	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.
		Other Feedback - people in our community are already struggling to pay the existing fees.
		<u>Fees and Charges</u> - people are leaving out community because of the rate fees and increasing these is causing more financial and emotional strain upon already struggling families.
134	Lynley Thomson	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.
135	Mathew Darling	Flood protection infrastructure - supports preferred option – Invest more than \$2.3m per annum.
		Other feedback - I am increasingly concerned that without appropriate flood protection infrastructure, supported by reliable modelling large areas of Southland will not be able to access insurance.

No.	Name	Submission
		I'd like to see Council further invest in supporting information and data to inform broader resilience to natural hazards, including a better understanding of tsunami risk to Southland coast, and coastal hazards. I worry here too, we will see increased challenges in insuring property for all Southlanders.
136	Clare Robinson	flood protection infrastructure - would like to see another option/view for Investing in flood protection.
		Shareholding in South Port NZ Ltd - instead of raising rates, some shares should be sold to reduce financial pressure on ratepayers.
		Fees and Charges
		 Fees should only be based on land and not capital value. Reduce staff and number of vehicles – included anecdote of 2 ES vehicles with 1 staff member in each visiting a farmer.
		Clean the rivers and get back to basics.
137	Thomas Dean	Flood protection infrastructure - Supports preferred option – Invest more than \$2.3m per annum.
		Other feedback I hope part of flood protection includes some thought around 'reclaiming' the river, within reason, for recreational use. In my particular interest, it is the silting, reduced depth, and narrowing of the Ōreti River below Dunn's bridge to the mouth opening. Improving this situation in the river and other rivers may assist in times of flood with better river flow and flood clearance.
		I would like to congratulate ES on a well thought out and presented approach to flood protection infrastructure as we have to respond to climate change now.
		Shareholding in South Port NZ Ltd a majority shareholding and control of South Port must be retained due to its significance to Southland.
		<u>Fees and Charges</u> - need to consider that non-profit groups should not be charged the same fee as a business or personal use. My experience of getting a consent for a sports group that would also benefit the township was it was too expensive to apply and ES were very rigid in their approach.
		Representation Review- it seems that certain groups (farming lobbies) are over–represented and create a bias that slows meaningful progress where it means a change for them. Better balance is required.
138	F Dawson	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.

No.	Name	Submission
		Do not agree to the change of using the Capital Value to determine the rate charges, unfairly impacting those that have worked hard to improve the value of their property.
		The ratepayers seem to bear the brunt of increased infrastructure costs that may or may not have any benefit to them at all. We are not paying for the flood risk to properties and businesses that were built in the wrong place, we totally disagree that Environment Southland should increase rates to fund proposed future flood protection, with Climate Change happening, when is this going to end?
		The ratepayers cannot continue to absorb rising costs.
139	Karen Mackie	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.
		ES has expanded staff with the proviso to work on government policies that have not been put on hold. Like the rest of us, you need to look at cutting back to a more manageable level. Staff have gone to site inspections unprepared and travelling in separate vehicles, wasting time and money.
		ES persists in using consultants for many projects rather than local knowledge who have far more constructive and practical knowledge to achieve the outcomes required.
		For a start, excavating gravel out of rivers to keep more flow in more target areas, stemming water creating less bank erosion. Many contractors are also travelling miles for gravel on our roads creating more damage when there will be many places closer to excavate gravel.
		Environment Southland has performed poorly with the consultation on this long-term plan, not being open and listening to ratepayers, and appearing to be rushing this through without many ratepayers being aware of what is happening.
141	Bridget Speight	Rate increase - My property is in the Waiau catchment which is very different from other catchments due to Meridians' contribution. We have a lot to lose under the present proposed changes to a regional rate.
		We have large reserves and we have a funding agreement with Meridian for a lot of items the ES proposes to rate us for.
		Effectively we could lose our reserves to a regional pot and end up paying for a regional rate we have no call on.
		The level of proposed rate increase is unacceptable.

No.	Name	Submission
143	Nathan Parris	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.
		Under the proposal we are set to have a 39% rate increase this year! We are sheep and Beef farmers in western Southland. Last year we made a \$30k loss and are forecasting worse for this year. Following years are going to be the same for a while and ES is proposing further increases.
		Aside from the current recession and financial hardship already felt by ratepayers in Southland, ES needs to get its wasteful spending under control before asking for more money. (Examples of this wasteful spending are provided in the full submission)
		As we live on the Waiau we have a lot to lose with our rates being offset by Meridian. They currently are held to account for erosion but under the new proposal with all money going to one big pool our money would disappear out of our catchment where it is needed for our own erosion control.
		Planning flood infrastructure for a one-in-400-year event is crazy. The NIWA model that it is being based on is excessive. As should have been learnt from previous big events in the 80's you cannot fully prepare for these events with infrastructure. A good warning system and civil defence plan is however imperative.
		I am strongly opposed to having a rates pool where funds are distributed from as this will see a lot of our investment disappearing to other areas when we need it in the Waiau catchment where we can use it accordingly for erosion work, weed control and fencing etc.
		Other feedback - rabbits need to be controlled on public land by ES but on private land that should be up to the owners' discretion.
144	Leon Black	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.
145	John Barnett	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.
		Delay Rates Hikes - please rethink your proposed plan of increasing an ongoing investment in the region's flood protection infrastructure.
		You have stated that this is not a new problem. You say it is Southland's ageing flood protection network. If this correct, have you not set aside capital for a programme to help this ageing problem? What I would really like to know is where all the maintenance money has been spent on this ageing problem? Many innovations of councils are to the detriment of renewing and extending some of the basic needs of Southland.
		Many of your ratepayers will have to reduce spending on some non-essential work. May I ask the council what reductions has it made?

No.	Name	Submission
		The economic position of all ratepayers is causing many problems. I am suggesting to the Council that they begin by giving us their suggested flood plans so that farmers and other ratepayers can assist in some little way.
		I do implore the council, to give the ratepayers a break, especially at this time in our country's economic position.
146	Kevin Meikle	 I do not support the investing in Flood Protection Infrastructure as proposed in your current LTP. I do not agree with the increase in debt. I do not agree with your reliance on Government funding in your LTP. There is little consideration of affordability, people are under a lot of financial stress. 'Significant' increase is a relative term. Suggest changing LTP to a maintenance plan of all foodbanks to be maintained and kept at level 3 and use some reserves to do this. Not completely against a capital value-based rate. I think a bit more thought needs to go into its implementation. The main factor from Hawkes Bay enquiry had been poor response by Civil Defence. How would our Civil Defence stack up? Maybe his should also be a priority in the LTP? The proposed LTP may be what you consider to be the best for Southland, but it is not an affordable one for our population. Other feedback- quote from the late Eve Poole, which I think should be adhered to: "It is not possible for a local body to organise itself to protect its area, its citizens and its industries from major disaster, whether flood, conflagration, earthquake, tidal wave or nuclear attack. Its ratepayers would protest vigorously against the cost of such required forces and organisations. The most that can be expected of local bodies is that they have a nucleus of trained Civil Defence personnel, around which communication, transport (both road and air) and assistance from Army and Police may be concentrated and organised."
147	Dean Blair-Edie	Flood protection infrastructure - would like to see another option/view for Investing in flood protection. I believe there should be no increase in rates based on the value of the property. It should be a localised increase dependent on the area i.e. flood prone areas should pay more. Our property is set to increase \$960 per annum, this is not ok, we are making losses as it is. The local stream through our property is the Orauea Stream It is blocked with willows which cause it to be up and flood the paddocks, but the council won't remove them saying it is not a rated river.
148	Sarah Blair-Edie	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.
		After consecutive financial losses 3 years in a row on farm.

No.	Name	Submission
		An increase in any rates will see more farmers start to struggle with their mental health. Families will end up walking off their farms- forced to do so due to Environment Southland increases. It cannot be sustained.
149	Stephen Blair-Edie	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.
		In view of the economic situation in the rural areas and most sheep and beef farms having to borrow extra money to get by this year. Also, Alliance Meat Company recorded a record loss of over 100 million. We will have to bail them out, let alone Environment Southland wanting to raise rates. I'm afraid the timing is very poor; it simply cannot be done until we have better times.
		If you wish to have a good relationship with landowners, don't do this.
150	Tony Strang	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.
		 Individual catchments should be financed separately. Mataura catchment has been there, as part of Aparima and was repeatedly outvoted on expenditure. Examples quoted by ES as above are not consistent with individual examples prepared by staff (see attached) note low value improvements, no house. Disaster reserve funds are not the property of ES and in Waimatuku can come from outside ES. Other feedback - Insufficient time has been given for ratepayers to consider and understand the multitude of changes. Farmers have to trim costs to within income, ES should too.
151	Lindsay Baird	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.
		No new debt. Keep rate increases in line with inflation only.
		Other feedback
		 Agree to move to capital value rates. Rates to be kept and spent in catchment collected.
		Climate change risk modelling is over hyped.

No.	Name	Submission
152	lan Smith	 Flood protection infrastructure - would like to see another option/view for Investing in flood protection. Two motions were passed with no dissention at Waimahaka meeting (25 public attended): Rates for the 24-25 year be held at zero. No matter which rating system is adopted, this region of Southern Southland, currently on F ¼ rates maintained with the same differential as today.
155	Richard Hazle	Flood protection infrastructure - supports the preferred option for proposed flood protection and rating.
156	Sue Bruce	Flood protection infrastructure - I do not support ES's preferred option of increasing Operating Expenditure by \$2.3m per annum for a new Flood Protection Infrastructure Rate. There seems to have been a lack of trying to consult with householders and a lack of transparency and openness. I do not believe an ad buried in my local newspaper is consulting.
		There is no guarantee that Government Resilience Funding will be given and I believe you should rethink the proposal on the basis of not counting on it.
		We the householders, do not have inexhaustible amounts of income to support schemes we cannot afford and I urge you as councillors to remember you are spending other people's money.
158	Kimberly Gaudin	Reserves - use reserves on getting Civil defence up to standard, the cost of living is high enough now in rural areas.
159	Brad Adcock	Reserves - spend reserves on getting the civil defence up to standard, the cost of living is high enough.
160	Waituna Liaison Committee (Carl McCrostie)	<u>Catchment Liaison Committees</u> - have the meetings with CLC chairs met the legislative requirements under the Local Government Act? They are felt to be a consultation tick box exercise.
		Capital value rating system – agree, in principle, with the move to capital value rating system to even out inconsistency in our current rating system. However, need visibility around where are rates are going at an individual catchment level.
		With cost of living, interest increases, depressed farming incomes, and recession, now is not the time to have huge rate increases. Your ratepayers are cutting costs and do not feel you have done the same.

No.	Name	Submission
		With change signalled in government policy to direct you back to core business, we believe there are many areas where savings could be made to help fund your catchment focus.
		A much stronger handle on staying within budget on projects is needed and demanded by your rate payers.
		We, your ratepayers, do not approve a spending plan to in-debt this council to the tune of over \$73 million in 10 years with the lack of detail about that in this plan.
161	John Bishop – on behalf of group of 41 farmers	Increase in debt/capital rating – we have grave concerns about the Long-term Plan detailed by Environment Southland. The increase in debt from \$18,978,000 to \$73,273,000 and the major shift to capital rating, resulting in substantial rate hikes, have prompted us to consider public protests.
	Tarriers	Fiscal prudence and accountability are expected of our local council and it is not being upheld.
		The financial burden this plan imposes is alarming and suggests a path that could jeopardize the economic stability of our farms and the broader community. The council must re-evaluate these decisions, advocating for a fiscal strategy that ensures long-term sustainability and fairness.
		We urge the council to engage with us and other stakeholders in a transparent discussion about these proposed changes. Our commitment to the economic health of our community compels us to speak out against these measures, and, if necessary, to organise and participate in protests to make our voices heard.
162	Loanne Moncur	Rates- the new rates proposed are too high.
163	Kelly O'Connor	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.
		Delay the Long-term Plan considering the current economic climate, rather than inflicting more financial burden on struggling ratepayers. When the economy has recovered would be a more appropriate time to consider this level of investment.
		Other feedback - review organisation structure and ensure all staff are high-performing and effective, delivering tangible outcomes for ratepayers.
165	Jane Arthur	Flood protection infrastructure – would like to see another option/view for Investing in flood protection.
		This should already come under the Land Sustainability rate. Too much money is wasted on Regional Leadership. ES should be working with farmers, asking for their input rather than engaging expensive 'experts'. ES has already wasted too much money taking a farmer to court.

No.	Name	Submission
		Divert money for flood protection from your other areas of over-expenditure.
		Your new rates are unaffordable for those of us on a low income. It should not be based on capital value of our homes which we have no control over. Every household should pay the same amount of \$.
		Page 20 is misleading. According to the table my rates will increase by \$95, but the rates calculator states \$146.41 (39%). That's outrageous, contradictory, and misleading. No more increases as financially rates are too expensive anyway.
166	Les Frisby	Flood protection infrastructure - agrees with the preferred option for investing in flood protection infrastructure.
		Other feedback - keep the rabbit control rate.
167	Stephen Futter	Proposed rating change - the flyer was the first I heard of a proposed rating basis change.
		I consider that Capital Value rating may be alright for commercial properties where the value is based on income earning potential but not for residential properties where capital value is a reflection of the age and quality of the dwelling and the land then this would be unfair.
170	Grant Hubber	Draft Financial Strategy. Guiding Financial Principles
		 Can see some of the reasons to change to a capital value rating system have merit. Concern that the one pot system under the new proposed Flood Protection Infrastructure rates draft will lead to less accountability and transparency for ratepayers. The current rate collection could be made fairer by increasing the F Class to pay a greater share of the rates. The new rating system will lead to the demise of the various liaison committees who have greatly contributed to assisting council in maintaining our flood bank infrastructure protection system. Concerned that the lease land reserve funds look likely to be taken into the greater pool. The lease land reserves in the Ōreti Catchment exist because land was purchased as part of the Ōreti River flood system in the late 1980s to allow for flooding events. These funds should be allocated to the catchment the income is generated from. Where is the \$2.3 million increase in operating expenses to be spent? This does need to be more transparent as the council does not appear to show anywhere that it is able to make financial savings. Currently one has to assume more staff. Talks of rebuilding capability over the next three years (assume this is again staff) to deal with the current maintenance issues which is reasonable, but then mentions also to be ready for investment opportunities in the future. If this is based on assumed future Government

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		funding being available, I agree with your auditors who believe this should have been given more thought. Where to then if the Government funding is unavailable? Council, now of all times, needs to show prudency with cost savings. I cannot see anywhere in the document the mention of cost savings in the council operations, just the certainty of a huge increase in debt reserving. Under the heading 'Guiding Financial Principles', nowhere does it mention cutting costs or making savings. Only the words 'affordable' and 'equitable' are mentioned and 'providing certainty to ratepayers.' The only certainty I can see is the proposed new rate increases are neither affordable nor equitable as presented, particularly in the current financial times. Councils nationwide are going through some tough decision-making. What happens now will have a direct impact on the long-term viability of local government as we know it, more so now than ever before. I understand the decision is yours as councillors at the end of the day as you are privy to more information. I respect that, but please respect your communities when you make your final recommendations.
171 – split with CCS	Glenda Bell	I am totally opposed to the proposed long-term plan because it lacks any credible substance. I wholeheartedly agree that you should continue collecting data, this is absolutely vital, for now and in the future. But what about the past? What records do you possess? In recent times Niwa has been found remiss in its duty to source, keep and make available to the public or anyone else, accurate and reliable records, especially of weather events occurring in the 1800's. So saying, you, as in ES, have a duty of due diligence and duty of due care to the public. It would be entirely sloppy and scandalous for you not to exercise it by looking up these and any other sources of past records, to build up an accurate picture of climatic events (heavy rainfall and other) over the past 200 or more years. In addition, I question - 1. How much of the budget for ES goes to outsourced consultants and experts? Are these necessary? Can they be done away with? Learn to rethink for yourselves within ES, and I am sure you will not need any of these people. 2. Shifting to a capital rates model is entirely unfair on farmers, in particular. Who will heavily subsidise and pay for flood mitigation measures for urban communities. 3. You need to cut out all the "resource consent" red tape and outrageous costs associated -making it extremely onerous for anyone wanting to extract gravel from rivers for roading etc.

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		4. How much of ES's budget is spent in the field doing actual constructive data collection, remedial and maintenance work? How much is spent on mere administration? Paper shuffling to satisfy the Governments demands? When, ultimately, both the Government and ES are answerable to the people of New Zealand, the tax and ratepayers. We are your masters, you answer to us. If you cannot achieve that simple task, cut back all of your unnecessary spending, and stick to the basics. Practical solutions first before "politics". If needs be, learn to say NO to central government. Sorry but the people of this region cannot afford this, and nor is it "necessary".
		What do all your extra staff in recent years do? How much of it is "essential" practical work and not mere ADMINISTRATION? Surely, a good deal of these created jobs can be done away with in the name of efficiency and necessity.
		5. You want to hike rates, when inflation, the cost of living, insurance, fuel, and such like are soaring in price; and neither wages, incomes or the pension is increasing to keep abreast! In short, what you propose in your long-term plan is unaffordable and neither reasonable, necessary or justifiable. Because if you do your homework, you will discover that there is: NO CLIMATE CRISIS. Accordingly, pull back and relax. And abandon your proposed Long term Plan.
		6. You want people to be more resilient in the event of a natural disaster like a flood. Well first and foremost, push to have reinstated cheques and maintain cash, because in any natural disaster, like the earthquake at Kaikoura, the first thing to go down is the power supply and cellphone connection. You must strive to reinstate and maintain an alternative analogue system to that of all things digital, which relies on an electric power source.
		We have all had a gut full of all this nonsense. And simply want the clock to reset to a simpler, more pragmatic time, where we looked out for each other, and simply just got on with things. And helped each other through thick and thin. Floods, snowstorms, earthquakes, and all.
173	Jim Maass-Barrett	Councils preferred option of creating a new Flood Protection Infrastructure Rate - we don't want Stewart Island ratepayers dragged into this new rate, we have enough extra high costs in our rates and living expenses that make it increasingly difficult to live here.
		It is not equitable for Stewart Island ratepayers to be paying for services that are not directly benefitting them. This also applies to the rabbit rate, there are no wild rabbits on the Island, and we are not allowed to even own domesticated rabbits. So we should not be penalised this way.
		The consultation leaflet spells out that Southland has four main river systems, with no mention of Stewart Island. Therefore, we should not be burdened with paying for the newly proposed rate.

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		The proposed new rate is not for specific projects that will contribute to flood resilience for Southland, it will apparently be spent on more staff, for example, to write more reports about the need for resilience. We need to see the capital works being planned and done, not more paperwork.
		In the Infrastructure document on pg. 9, Table of Assumptions, the last box at the LHS of the table notes: "That national climate modelling is achievable, and that national data will be available in the next 12 months, with regional data available by 2025." This means it will be unnecessary to spend a new rate on "increased flood modelling and data collection" as it will soon be provided.
		If ES could see, all the answers except raising the funding, lie within the documents attached to or associated with this new LTP.
		Look at the "pre consultation" consultation document that is included in the supporting documents provided. There must have been a few farmers at these meetings, their suggestions to increase flood protection is for" gravel extraction, gravel extraction, gravel extraction with willow/vegetation removal if appropriate, and urgently making it easier in RMA terms to get consent."
		It would have to be done on such a scale ES would need to urgently think of ways to expedite the work. Pg.20/21 of the strategy hints at possible steps: Option 1, "implementing prioritized work programmes in consultation with the community" and Option 2, " procurement practices will be improved including the exploration of longer term, large- scale contracts"
		There must be dozens of other ways to get some "shovel-ready" projects quickly off the ground. ES has already identified this issue of sedimentation through catchments and offered the solution, "extract gravel" on page 28 of their Draft Infrastructure Strategy 2024, so they don't need consultants to point this out.
		What is abundantly clear is that ES will have to work very closely with other agencies of central and local government because much of the flood protection work will be aimed at protecting the assets the other agencies are responsible for, namely highways, roads, bridges, water and wastewater works, communications, etc. The problem is so big and so urgent amalgamation of authorities should be seriously considered.
		I am heartened to note the Murihiku Southland Regional Climate Change Strategy is being developed with Te Ao Mārama.
		While reading the documentation supplied on the ES website, in the Infrastructure Strategy there is a section on future budgets being developed. Within them was an entry for income titled "Gravel Income" with a reasonably modest figure of about \$200,000 per year initially. What is ES thinking here? Is this income from royalties for gravel extraction by consented operators? Or are they thinking they will run their own companies extracting gravel? I would like some clarification on this please.

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		My opinion is that ES needs, with great urgency to dig into their institutional knowledge and use that and all the planning tools available to find the answers that are sitting in plain sight in front of them, before wasting ratepayers money and ES time getting a new bunch of consultants who have no local knowledge. Much of this information is in the Strategy already, as I've noted above. Involve the people out there who live in the valleys and flood plains, who know intimately their environment. It will be in the long run, cheaper, quicker and infinitely more effective at getting a head start on this unending challenge we have created for ourselves through Climate Change. It is noted in this submission around negative sentiment towards Southport and dealing with Southport. Deemed relevant as ES have 66% share.
174	Nancy Barnes	Consultation - a long-term plan and you present this idea to the Fiordland Community Board and give them and us the people you all service just one week to view it and give our opinion. This is undemocratic, especially as even the community board knew nothing about it. You graciously allowed us another week, really? and this is enough time for the people that you are meant to represent to make such important decisions that will affect us and our families.
		So because of the lack of time and consultation, I say No to this plan until you give a reasonable time to view said plan. My suggestion is to put this on hold for 12 months and get this plan out there to the public. The public that you are a servant to, not a master.
177	Murray Bruce	Flood protection infrastructure - Does not support increased operating expenditure by 2.3mill due to country's economic difficulties. Consultation - Not a good consultation process.
178	Jefferey Arthur	Flood protection infrastructure - Do not support increased flood protection infrastructure, deal with the environmental issues and flood protection will take care of itself. Climate Change strategy - based on false science. Capital value rating - is irrelevant as you don't service buildings. Consultation - poor consultation process. Pest management - under-resourced
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No.	Name	Submission
180	Katherine Morrow	Rates increase - Against the proposed long term plan rates increase.
181 – split with CCS	Department of Conservation (Rachel Moore)	Acknowledged that ES is an important partner for DOC, supports much of the document, recognises collaboration continues, and has aligned objectives. Section 1: the consultation process
		Outlined their understanding of the consultation process. Section 2: recommendations Leadership: acknowledged a lift in collaboration at a leadership level Increased flood protection: endorses this work, recommends prioritising Cleddau Flood Protection Scheme supports slow the flow. noted the importance of nature-based solutions. recommends including in the doc: "The environmental effects of river management should be reduced, and that this will require a combination of reducing effects of physical works and increasing the use of nature-based solutions, soft engineering and integrated land management". Notes that increase flooding/high water increases transport of nutrients and recommends flood protection work includes ensuring that land in flood zones have appropriate nutrient limits.
		Climate change • Endorses regional approach, aspirations and continued investment in adaptation science and modelling Prioritising freshwater outcomes • Endorses Integrated environmental planning framework • Supports robust RPS & Regional Plans • Notes importance of RPMP • Recommends prioritising regional coastal plan • Looks forward to collaborating on plans particularly sWLP, RPMP & FMRPMP
		Science and monitoring • Supports continued investment esp FMRPMP, and biosecurity work in Fiordland

No.	Name	Submission
184 – split with CCS	QEII Trust (Kate Lindsay)	Predator free Rakiura Recommends continued investment Darwins Barberry Increased investment need for success Wilding pines Recommends collaboration with neighbouring regional councils Cruise ships Wants to be included in an CoP developments or reviews Community collaboration Consider funding mechanisms to fill the jobs for nature gap in community group funding EMS supports oil spill response Section 3 — The biodiversity context for the Southland Region This section outlined key points on biodiversity as noted in the Southland Murihiku Conservation Strategy (CMS). Collaboration—Opportunity to work closer together, submission highlights some of these. Would like to see a commitment to increase investment in private land conservation in the next 10 years, to fill the funding gap left by Jobs for Nature. Cost-share to support establishing protection over privately owned places with high indigenous biodiversity value. Climate Change Strategy - Supports the development of a regional climate change strategy. Needs to ensure environmental resilience in the face of climate change is included, protecting native ecosystems on private land is critical, and can be supported by effective regional pest animal and weed management to ensure protected places are healthy and resilient.

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		Supports the investigation of nature-based solutions, but highlights care must be taken to ensure that any green infrastructure efforts are implemented with care and do not negatively impact existing native ecosystems.
		<u>Pest species</u> - Requests funding support from third parties such as the council is much needed to support the management of feral ungulates (e.g. deer, pigs), as is strategic control at a catchment/landscape scale.
185	Doreen Lee	Rates increase - If rates go up continually, we will be forced out of our homes and be living on the streets. We are not a bank with unlimited funds.
186	Fiordland Marine Guardians (Rebecca McLeod)	Climate change - Pleased that the proposed LTP gives due consideration to the risks and implications of climate change and applaud the Iwi/Māori and multi-agency approach taken with the associated Murihiku Climate Change Strategy.
	Wickeday	Support the inclusion of nature-based solutions.
		Fiordland Marine Regional Pathway Management Plan - 'Healthy Environment' – should include further developing and possibly extending the FMRPMP.
		Infrastructure Strategy - should also include infrastructure to realise marine biosecurity/biodiversity regional goals.
		Marine - Support a vessel haul out in Bluff as a significant business growth opportunity supporting a "thriving region".
		Supports the work the council does in in coastal and marine resource management.
187	Geoffrey Young	Rates increase - grave concern for the proposed 23% increase in regional council rates due to costs of living.
		Flood protection infrastructure -Concerns about the budget for flood infrastructure (boundaries the upper Mataura).
		Flood bank impact both positive and negative. Positive – provides protection, negative – constricts river flow.
		Gravel management is essential, mitigated by timely periodic intervention.
		Too much money spent on modelling, science, consultants where the catchment teams could achieve much more with the staff in charge of river management and input from adjoining landowners.

No.	Name	Submission
188	Ben Dooley	Southern Pest Eradication Society - Keen to see the Pest eradication society continue to be supported – we can't drop the ball now. Flood protection infrastructure - rates should stay at the status quo, it's not up to ES to dabble in wealth equalisation, socialism, whatever you want to call it.
		Capital value rating system - Does not support the capital value rating system.
		Environmentally good property improvements with discounts is not a good idea, this is not how rating works.
		Money for flood protection should be kept in the catchment in which it is collected.
189 – split with CCS	Alison & Roger Copland	Flood protection infrastructure - Do not support the increased operating expenditure for flood protection, there are more practical ways of dealing with it.
		Rates increase - Do not support any rates increase due to cost of living.
		Science - ES need to do their due diligence when it comes to science, as there is a risk the science you are adhering to is incorrect.
		Heating – shifting reliance to electricity is going to harm community wellbeing.
		You need to listen to the people and consider the impacts this plan will have on people's wellbeing.
190	Ann-Marie Robinson	Rating - Does not support reducing the Uniform Annual General Rate and replacing it with the capital value rate for flood infrastructure. Farmers will struggle.
		Flood protection infrastructure - Want to address gravel build-up.
		Curb wasteful spending.
		Southland Pest Eradication Society - Support the Southland Pest Eradication Society.
192	Barb Keen	Capital value rating - Does not support move from Land Value to Capital Value. She is a pensioner and states that she cannot afford the new rate and it will have a detrimental effect on standard of living.ES should be concerned with the environment (land) not building (capital value).

No.	Name	Submission
		<u>Consultation</u> - Poor consultation process.
193	Murray & Tania Beck	Flood protection infrastructure - Doesn't think there is anything wrong with the current flood protection. Commented that life was lost in 1878 (which I take as meaning these events have been happening for a long time and we can't protect everyone) It's not fair that people who purchased properties in flood risk areas should expect others to foot the bill to protect it. Climate change - People need to adapt to the climate as it changes.
194	Aparima Catchment Liaison Committee (Grant McGregor)	Flood protection infrastructure – Submitter requests ES to hit pause and delay all aspects of the Flood and Infrastructure Rate for (at least) a year.to allow for more consultations and other rating options.
196		Transferred to climate change strategy hearing.
198	Peter Baker	Flood protection infrastructure - Would like to see another option/view for Investing in flood protection. Use the 25 million reserves to do urgent work to level 3 only. The impact to lifestyle blocks has not been considered. I would think the current system should be kept. I put thought and care into NOT buying land that was a flood risk. It's not fair that I should have to pay for those that purchased less wisely. Capital Value rates - are due to increase this year – this increase has not been taken into account in the figures shown. Neither has future increases.
200	Suzanne McKenzie	I totally object to and totally reject the proposed ES LTP and all within, for the following reasons. Consultation You have failed to notify all stakeholders/ratepayers as required by the Public Consultation Act 2002. My elderly mother had no idea of these proposed rate increases. Neither can she, or I, afford them. Why were all ratepayers not notified by mail when you can 'afford' to send out your rates demands by mail, but can't, by letter notify us, the ratepayers, of "proposed" SIGNIFICANT changes to the rating system and the forecasted resultant (huge) increases. Ratepayers have not had adequate time to research and investigate the proposals outlined in the 'consultation' document, making a mockery of this being 'consultation'. Capital value rating

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		 Why does this "consultation" document and the accompanying illustrations model everything on the proposed change to a Capital Value based rating system (like it's already a 'given'), without illustrating the current Land Value based modelling for a realistic comparison. How is this 'consultation' when you're not actually presenting the direct current, with the proposed, modelled, possibility/ies? Your proposed change to a Capital Value based rating system represents, in reality, an underhand, undemocratic, unfair, massive increase in rate-take revenue off Southlanders in a time of a cost-of-living crisis and economic recession. This does not make anything more "equitable" for anyone. The consequences of your proposals are not 'sustainable' nor realistically viable, and I believe will have significant negative impact on many in our community, financially and also mentally, should they go ahead. This is a time for restraint and financial stewardship, not unaffordable, unjustified, unscientifically-based, (and endless) rate increases. Pobt Your LTP's predicted 280% + debt increase is beyond crippling and is UNSUSTAINABLE. Going from \$18,900,000 to \$73,000,000 in level in supposedly 10 years is wrong and unjustifiable on every level. Flood protection infrastructure We have been long at risk of some flooding in Southland. This is nothing new. Your 'climate change' justification for remedial or "new" infrastructure is based on bogus science and modelling. Requests that ES; delays all aspects of flood protection infrastructure improvements except the most urgent repair works and allow time for further consultation with land managers and the community/ratepayers. clear out the gravel from the rivers; use our 25 million reserves to do urgent remedial/repair work to level standard 3 only.
201 – split with CCS	Jesse Bythell	Investing in flood protection infrastructure - In general, is supportive of initiatives to provide flood protection to Southland communities and infrastructure and support the proposal to increase rates as laid out in the draft plan. Emphasises that in many instances, we will need to rethink how to prioritise these activities to ensure we avoid 'doubling down' on building expensive infrastructure in increasingly hazardous places. When investing in the protection of current communities and infrastructure we must also consider the burden we pass to future generations, not just the need to service debt but also to reinforce expectations to protect past investments. Supports initiatives such as 'slow the flow' and other resiliency efforts that deliver co-benefits like reduction of sediment loss to waterways or enhancement to natural ecosystems.

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		However, we need to be careful when employing nature-based solutions (such as making our environment more spongey as it once was) that we fully understand the existing ecological values present at any given site before rushing in with human solutions.
		Proposed changes to the Revenue and Financing Policy - supportive of changes which will enable more resources for implementing the Regional Pest Management Plan and Fiordland Marine Regional Pathway Management Plan. I see significant private investment in pest and weed management across the region and wish to see more investment in surveillance of newly emerging threats in particular so we can maintain gains and head off new threats more efficiently.
		Targeted rabbit control rate
		 Agrees that a coordinated approach to rabbit control is desirable to maintain gains. Unclear how SPEC delivers on this work as didn't initially know of their existence. Unclear how this targeted rate is spent or what level of data collection is undertaken regarding this work.
203	Melanie Boulton	Consultation - submitter not informed of this Proposed Long-term Plan until now (10 May) and oppose the proposed plan.
		Rates increase - a increase in rates will affect my family greatly given our current financial situation in the following ways:
		Budget Constraints: with our current income barely covering existing expenses, any increase in rates will likely put additional strain on our budget.
		 Prioritising Spending: we may need to reassess our spending priorities and possibly cut back on items to compensate for the rise in rates. Impact on Savings: if we're forced to dip into savings to cover the increase in rates, it could jeopardize our ability to save for future goals such
		 as emergencies, education, or retirement. Over time, this could leave our family financially vulnerable. 4. Potential for Debt: in extreme cases, an increase in rates that isn't manageable within our current budget could lead to taking on debt to cover the shortfall.
		 5. Stress and Anxiety: financial uncertainty and the prospect of having to make difficult spending decisions can lead to increased stress and anxiety for myself and my family members. This can have negative impacts on mental and emotional well-being.
		<u>Civil Defence</u> - our current Civil Defence is not up to standard. Spend reserves on getting Civil Defence up to standard.
204	Colin Tait	Would like to see another option/view for Investing in flood protection.
205	Kimberly Zwagerman	Would like to see another option/view for Investing in flood protection.

No.	Name	Submission
208	Janet McDonald	Flood protection infrastructure - would like to see another option/view for Investing in flood protection.
		Wasteful spending - submitter considers ES should stop wasteful spending on unnecessary consultants and employees working on increasing rules and regulations for example. It is continually said in the consultation document that we can't go back to a more pragmatic time, but this is patently untrue.
		Climate Change Strategy — objects to the climate change industry overstating possible weather outcomes and encouraging unnecessary spending as a result. If the climate change advisers and financial contributions to this industry were removed, there would be no need to take out large loans and could still fund infrastructure to protect the community from possible weather events. Objects to people being rated out of their homes.
209	Russell Weeds	I support the proposal to have a new Flood Protection Rate
		I support the proposal to move the Biosecurity and Land Sustainability rates from land value to capital value.
		I support spreading the cost of Flood Protection Infrastructure region-wide.
210	Natalie Malone	I do not support the proposal to have a new Flood Protection Rate
		I do not support the proposal to move the Biosecurity and Land Sustainability rates from land value to capital value.
		I do not support spreading the cost of Flood Protection Infrastructure region-wide.
211	Doug Ramsay	I do not support the proposal to have a new Flood Protection Rate
		I do not support the proposal to move the Biosecurity and Land Sustainability rates from land value to capital value.
		I do not support spreading the cost of Flood Protection Infrastructure region-wide.
212	Brenda Drysdale	I do not support the proposal to have a new Flood Protection Rate
		I do not support the proposal to move the Biosecurity and Land Sustainability rates from land value to capital value.
		I do not support spreading the cost of Flood Protection Infrastructure region-wide.
213	Peter Stevens	I support the proposal to have a new Flood Protection Rate
		I do not support the proposal to move the Biosecurity and Land Sustainability rates from land value to capital value.
		I support spreading the cost of Flood Protection Infrastructure region-wide
214	Jenny Pearce	I do not support the proposal to have a new Flood Protection Rate
		I do not support spreading the cost of Flood Protection Infrastructure region-wide.

No.	Name	Submission
215	Murray McDonald	<u>Debt</u> – does not support indebting the community. Requests Environment Southland considers cutting unnecessary costs like the rest of us. Use small local contractors and reduce red tape to make savings on building flood banks etc. Environment Southland's job is not to bankrupt ratepayers by doing work beyond what is necessary.
		Climate Change Strategy Stop wasting money on the climate change industry. Use savings on practical things like infrastructure and rabbit control. The Climate Change industry needs to be unfunded and money used to provide necessary infrastructure.
217	William Tervit	Flood protection infrastructure - No opinion given on investing in flood protection infrastructure.
		<u>Fees and charges/rates increase</u> – submitter comments that NZ is in a financial slump and that all businesses have had to trim their budgets leading to job losses around the country. The agriculture industry has been particularly hard hit with increases across the board.
		Submitter feels that ES needs to have a major downscaling, removing unproductive work and focusing on productive work such as stopbank maintenance adhering to existing budgets and parameters.
		Believes stopbank work is essential and is dismayed by the many weak points and the neglected budgeted upkeep work. Disregard for purpose of the rates and your wish to ask for crippling borrowings for basic maintenance work to be completed is unethical and obscene when the country is struggling with financial shortfalls.
		Submitter proposes to retain 9-10 existing staff to operate the diggers, buy 9-10 more 32 tonne diggers and put them on the stopbanks and continually keep on top of the maintenance on all existing stopbanks constantly looking at them in the same way you maintain and upkeep rural roads funding from the existing budget.
		The submitter suggests cutting the total staff numbers to 20 plus your digger drivers. Seriously look at your operating costs, how to trim them and still operate efficiently within your budget as all businesses must do.
		Submitter is concerned that ES says you must follow NIWAs predictions as they are too variable, and the funding comes from your ratepayers who trust you do the right thing by them. Follow ratepayer preferences as they elect you to do so.
218	Julie Freeborn	Submission on behalf of the majority of the Catchment Liaison committee chairs.
		The majority of the Catchment Liaison committee (CLC) chairs met at Winton on 19 April 2024 to discuss the proposed ES LTP. It was decided to draft a letter to ES to raise the concerns of the group and this submission is based on the contents of that letter.

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		 Insufficient time allowed for public consultation (believed to be acknowledged by the extension of the submission deadline) Some of the CLC AGMS hadn't been concluded by the original closing date which meant not enough time for community discussion around implied loss of autonomy revenue and reserves. At the 19 April meeting the chairs unanimously opposed the use of leasehold reserves for purposes outside the catchments from which the monies were generated. Concerns about one single rating proposal from ES and want to see further options available. Do support in principle a shift to capital value as a positive move to spread the rating burden region-wide. The proposed rates increase of 23% is unacceptable. Urge fiscal responsibility when Reserve bank trying to control inflation. Suggested deferring for 12 months the proposed flood protection and infrastructure rate to lower the rates rise for 24/25 and give central govt time to clarify its funding intentions and continue to consult widely with affected communities. CLC chairs advise Council that our communities are under significant stress from cost-of-living increases, poor commodity prices and increases from insurance and interest costs. The LTP should be grounded on the affordability of rates proposed. It doesn't mention rates affordability or the consequences on the community of the large increases in debt proposed. The chairs oppose the borrowing of \$73 million by 2034 as proposed by council. The chairs support the proposed funding of Biosecurity and Land Sustainability by way of a regional capital value rate.
221	Tony Dunnage	Increase in rates - when things get tough you have to cut costs, but you are increasing them not good for people's mental health. South Port shareholding – no comments stated.
222	Lindsay Gerrard	Catchment liaison committees - Pg 13 LTP Consultation Document says "we also want to build expertise and capacity in our Catchment team to support increased resilience for our flood infrastructure " Submitter wants all catchment liaison committees to be retained just as they are due to the wealth of historical knowledge within most of these committees - much of which is family generational. Don't be short sighted and allow this too to be lost. Members involved in these committees have much to offer. Submitter strongly opposes any of the Öreti i River Reserve Fund being used in any other Catchment. Earned in the catchment, Retained in the Catchment For the benefit of the Catchment.

No.	Name	Submission
223	Sim Grigg	Flood protection infrastructure/capital value rating - submitter does not support:
		the proposal to have a new flood protection rate;
		the proposal of moving the Biosecurity and Land Sustainability rates from land value to capital value;
		spreading the cost of Flood Protection Infrastructure region wide.
224	Stephen Rabbidge	Flood protection infrastructure/capital value rating - submitter does not support:
		the proposal to have a new flood protection rate;
		the proposal of moving the Biosecurity and Land Sustainability rates from land value to capital value.
225	Nicole Sharp	Flood protection infrastructure/capital value rating - submitter:
		supports the proposal to have a new flood protection rate;
		opposes the proposal of moving the Biosecurity and Land Sustainability rates from land value to capital value;
		supports the spreading the cost of Flood Protection Infrastructure region wide.
226	Paul Weymouth	Flood protection infrastructure/capital value rating - submitter:
		does not support the proposal to have a new flood protection rate;
		opposes the proposal of moving the Biosecurity and Land Sustainability rates from land value to capital value.
227	Angela Spedding	Flood protection infrastructure/capital value rating - submitter does not support:
		the proposal to have a new flood protection rate;
		the proposal of moving the Biosecurity and Land Sustainability rates from land value to capital value;
		spreading the cost of Flood Protection Infrastructure region wide.
228	Laura Grigg	Flood protection infrastructure - Submitter is against the proposal for one flood protection rate.
		Submitter found the feedback process hard to follow, has 3 properties so wishes submission to be considered 3 times.
229	Rowena Whale	Pause on LTP- Submitter requests that the LTP be put on hold for a year.
		ES said in the revenue and finance policy that every ratepayer would receive a letter regarding the proposed impacts, but this hasn't happened.
		There is a recession and ES must take a more prudent approach and give us more time to get a better understanding.

No.	Name	Submission
230	Diana Rickerby	Investing in flood protection infrastructure - Submitter does not support the preferred option, supports another option/view.
		Submitter suggests doing your sums again and can't fathom what the value of a building has to do with the environment. Comments that during these times of financial difficulty the rising of rates at this amount is unsustainable for a lot of people and cannot support this.
		Other feedback – Disagrees that the consultation document hasn't been sent to all ratepayers, and comments that changing what you are doing on 24 April when meeting is 6 May indicates you're avoiding public comment which shouldn't happen.
231	Sally Munson	Investing in flood protection infrastructure - Submitter does not support the preferred option, supports another option/view.
		Consultation - Submitter comments that if you posted a notice to every ratepayer they didn't get one, there isn't enough time for feedback, the size of the rates rise on top of last year's is outrageous, not justified for the size of my property, questions what have you been doing about flooding for the previous decades, is a pensioner and this would make life just that much harder.
		Other feedback – the website for submission is very difficult to navigate, questions if you trying to prevent comments.
		Submission b Questions how the value of a building is relevant for the work you do on protecting the environment?
		Rates increase - Submitter has used the rates calculator and asks where you think the 33% rates increase money is coming from for a pensioner?
232	Alexander Reid	Rates increase - Submitter comments that he and his wife are unable to pay for any rate increase as pensioners. He does some casual work to help with rising costs but will dry up as he gets older. Submitter believes Council is trying to rate us off our land and it's affecting their mental health.
		Has concerns that staff and vehicle numbers is out of control.
233	Helen Todd	Pause on flood planning and rates - Submitter requests that ES delay all aspects of flood planning and rating for at least a year to allow more time for public consultation and has concerns about paying for this on a fixed income.
234	Amy Hughes	Investing in flood protection infrastructure - Submitter does not support the preferred option, supports another option/view.
		Submitter comments that instead of investing in flood protection infrastructure consider a more logical solution of getting the gravel out of the rivers.

No.	Name	Submission
235	Heather Greaves	Investing in flood protection infrastructure - Submitter does not support the preferred option, supports another option/view.
		Capital value rating - Submitter is concerned the proposal to rate based on capital value will impact everyone. Costs will just be passed on to all consumers. Landlords will increase rents, companies the cost of their products to offset the rates increase so people will end paying more for everything.
236	Ann Sutherland	Investing in flood protection infrastructure - Submitter does not support the preferred option, supports another option/view.
		<u>Capital value rating</u> - Submitter is concerned the proposal to rate based on capital value will impact everyone. Costs will just be passed on to all consumers. We will be paying twice. The country is in recession so put a hold for at least a year to give people more time to understand where increases are going.
238	Clifford Baker	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter noted:
		The economy is not in good shape with people struggling with the cost of living.
		• The 'preferred option' is dependent on Government funding, assumed to be 75% for years 4-10. The independent auditor considers this assumption to be 'unreasonable' (Page 33).
		The submitter suggests to:
		halt the Long-term Plan for one year,
		use the \$25m in reserves to do urgent flood protection work to Level 3 only,
		spend reserves on getting Civil Defence up to standard.
		Shareholding in South Port NZ Ltd - do not consider reducing ES's shareholding in South Port NZ Ltd. This provides valuable income.
		<u>Consultation</u>
		The Long-term Plan has not been sufficiently publicised.
		The submission form published in the Southland Express on 2 May was too late for postal option.

No.	Name	Submission
239	Pauline Sigurgeirson	 Flood protection infrastructure - Would like to see another option/view for investing in flood protection. The submitter: disagrees that rating for flood protection, land sustainability, and biosecurity be changed from the basis of land value to capital value. suggests moving away from 140 catchments to a centralized system will not improve anything and could result in losing local expertise and knowledge. suggests sticking with the status quo. Better utilize money within the organisation and re-allocate money into flood protection.
240	Huon Love	The submitter would like to see a breakdown of where all the money goes instead of just general and uniform. Flood protection infrastructure - supports Preferred Option – increase operating expenditure by 2.3m per annum, funded by a proposed new Flood Protection Infrastructure Rate. The submitter noted: Our major rivers are in a dire state with gravel build-ups. Another major rain event could cause devastating flooding.
241	T Wilkes	Need heavy machinery in our rivers and to bring back gravel crushers to resurface our gravel roads. Flood protection infrastructure - supports Preferred Option – increase operating expenditure by 2.3m per annum, funded by a proposed new Flood Protection Infrastructure Rate.
243	Kevin Marshall	Flood protection infrastructure - Would like to see another option/view for investing in flood protection. The submitter noted: There is a limit to the ratepayers ability to pay all the different Council rates Needs to be longer-term planning to ensure work done mitigates climate change and future weather patterns. Need research and data evidence for any required work. Stop banks can create problems and with costs v benefit may not be viable. Willow control work needs to be kept up. Other feedback The submitter states that the Envirosouth magazine is a "waste of money and an exercise is self-praise". The submitter does not agree with the rabbit control rate as does not see any control happening.

No.	Name	Submission
244	Anita Kennard	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter requests:
		No immediate rate changes and no move to capital value rating;
		Hold off on the LTP for at least 1 year until there is more clarity on future policies;
		A reduction in consultants and third-party employees;
		That ES work within their current budget and do not increase debt;
		Delay work on flood protection infrastructure and focus on logical approaches such as gravel removal from rivers.
245	Nathalie Sterkens	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter acknowledges that more is needed to protect the community from flooding but suggests current rates should be able to cover this.
		The submitter requests for ES to look at how the organisation is run and where efficiencies can be made before increasing rates, noting rates have tripled whilst living here.
246	Leigh-Ann Bekhuis	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		<u>Fees and charges</u> - The submitter noted that current fees and charges are already high, and people will not be able to pay them if they keep increasing.
247	Dean Stockdale	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter notes that building higher stopbanks does not address the main issue for NZ rivers, which is gravel build-up. The submitter suggests removing this gravel and allowing deeper unrestricted water flow is a more sensible approach.
		Revenue and Financing Policy - The submitter opposes rating on Capital value and believes it should remain rated on Land Value. The submitter also notes ratepayer income has not increased in line with % of rate increases proposed.
248	Esther Peters	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter notes that the country and people are already struggling financially and increasing rates will add to this burden.

Name	Submission
Jeremy Peters	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
	The submitter asks the council to "think about the current stage of everyone's finances. This cannot happen."
James Buchan	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
	The submitter noted concern about the significant build-up of gravel in the rivers, causing erosion of farmland. The submitter suggests the extraction of gravel beaches and deepening the riverbed to allow more river flow and reduce algae.
Gerritje Ultee	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
	The submitter believes that all will be impacted by rating system changes from land to capital value not just through individual increases but also through businesses increasing prices to cover the rate increase.
John Kelly	Would like to see another option/view for investing in flood protection.
	 The submitter notes that: Current rates being paid should be able to cover flood protection. ES should consider a reduction of staff and do their job properly. Scientists have stated even with measures to halt climate change it will only stop temperature rise by 2 weeks and does not justify increasing rates.
Michael Kelly	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
	The submitter requests "ES to delay all aspects of flood planning and rating for at least a year, allowing more time for consultation."
Lisa Ward	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
	The submitter notes that the country is currently in recession with NZ residents already overtaxed and many families currently under stress and pressure "but are you going to listen or is this going to be another we just going to do it".
Vicky McWilliam	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
	Jeremy Peters James Buchan Gerritje Ultee John Kelly Michael Kelly

No.	Name	Submission
		The submitter does not agree with the proposals, noting that people currently pay enough on their rates and that wages have not increased at the same rate as inflation and cost of living increases.
256	Matthew Kelly	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter notes that with the high cost of living, an increase in rates will make it even more challenging for the average family.
257	John Ward	The submitter states "Just atrocious, people are at the limit. Time to get a government that looks after its people. No more taking."
258	Barbara Kennedy	The submitter requests that no action be taken until the whole community is aware of the proposal.
259	Hazel Leckie	Rate increases - Submitter requests rates increase be put on hold for a year due to cost of living.
260	Luke Kelly	Submitter states "Rate payers haven't had time to totally investigate the proposed changes and put forward better options".
261	Sharon Leckie	Rate increases - Submitter states "Everyone will be impacted if this rate increase is changed to capital".
264	Shiralee Merrick	Rates increases - Rates increases will have a snowball effect – businesses will pass on the cost to consumers.
265	Stephen Chernishov	Flood protection infrastructure – remain at a level 3.
266	Karen Hoffman	Flood infrastructure – remain at level 3 maintenance, delay the process 12 months to properly consult with community.
		Rates changes - Does not support the rate changes.
267	Judith Scott	<u>Consultation</u> – submitter does not support changes outlined in the LTP as community have not been fully informed or had time to fully understand the implications.
268	J F Breetzke	Capital value rating - Do not support the capital value rates changes.
269	Raewyn Kendall	Snowball effect, those impacted will pass the costs along where they can. Capital rate changes - Halt the capital rates changes due to cost-of-living crisis/recession.
270	Christine Uhlmann	Flood protection infrastructure - Delay the changes so can fully understand the long-term effects.

No.	Name	Submission
		Maintain the flood banks to level 3 status.
271	Lawrence Rewcastle	<u>Capital Value Rating</u> - Submitter requests Council take a more prudent financial approach due to recession. Does not support capital value rating system.
272	Lilian Capil	Submitter opposes any proposed changes to the 2024-2034 LTP.
		Capital Value Rating - Submitter requests Council take a more prudent approach to the LTP. Does not support capital value rating system.
273	T C Moulin	<u>Delay decisions on rates and flood planning</u> - keep at level 3 for a year due to recession.
274	Zilda Harvey	Consultation - Rate payers have not had time to fully investigate the changes.
275	Jenna Kelly	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		Capital value rating - The submitter disagrees with the proposal to move to a Capital Value rating and points out that with the country in recession ES must take a more prudent financial approach.
276	Anthony Beveridge	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter requests that ES delay all aspects of flood planning and changes to rating for at least a year to allow more time for consultation.
277	Gladys Kelly	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter notes that;
		Ratepayers have not had time to fully investigate the proposed changes and put forward other options. Adam pater a proposed in the appropriate proposed proposed changes and put forward other options.
		Many ratepayers in the community are not aware of the proposed rate changes from land to capital value.
278	Nathan Kelly	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with the proposed increases noting "too much for people as it is, you can't keep taking".

No.	Name	Submission
279	Paul Kelly	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with the proposed changes noting that people are struggling to pay their bills already.
280	Sam Kelly	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with the proposed increases noting current challenge of the cost of living.
281	May Hunter	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with the proposed changes noting "People find it stressful enough, paying through the nose for everything. Stop this madness".
282	Barbara Thompson	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with the proposals – gravel islands are the problem, and the gravel needs to be taken out.
283	Laura Raggatt	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		Use \$25 million in reserves to do urgent work to level 3 only.
		Do not see any progress, where is all that money going to?
		Cut staff like other companies are doing.
284	Suzie Elmes	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with the proposals.
		Halt the Long-term Plan.
		Spend \$25m reserves on repairing current flood banks to level 3.
		Get Civil Defence up to standard.
285	Corey Watson	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.

No.	Name	Submission
		Capital value rating - The submitter does not agree with the proposal or rating change from land to capital value.
		 Use some of \$25m reserves for remedial work. Get the gravel out of the river.
286	Penny & Brad	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
	Macpherson	Capital value rating - The submitters do not agree with the proposal to move from land to capital value rating. "ES must take a more prudent financial approach to the LTP".
287	Glenis Porter	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with the proposed changes and suggests ES should: consider using the \$25m in reserve to do urgent work to level 2. stick to a budget and not keep increasing rates.
288	Heather Carr	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		 Spend reserves to repair flood bank to level 3. Clear out the riverbeds. Get Civil Defence up to standard. More consultation required.
289	Christopher Carr	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		 Use some of the \$25 m reserves to fix flood banks and get Civil Defence up to standard. Take some gravel out of the rivers.
290	Lindsay Wallis	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with the proposals and believes the LTP should be halted.
		Use some of the \$25m reserves on urgent repairs to Level 3.

No.	Name	Submission
		Get Civil Defence up to a decent standard.
291	Clayton Roe	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		<u>Capital value rating</u> - The submitter does not agree with the proposals. Noting if moving to capital value there should be some differential e.g. wintering sheds.
		Urgent flood bank repairs to Level 3 only – use some reserves.
		Stop Long Term Plan until the economy recovers.
292	Beverley Wilson	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		Halt the Long-term Plan for 1-year minimum.
		 Use \$25m reserves to do urgent repairs to Level 3 and get our Civil Defence up to standard.
		Is our Civil Defence up to standard?
293	BJ Pascoe & M A Farley	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		Maintain flood banks to level 3.
		Consult as used to circa 2000.
		No confidence in the board – "listen to the people, they are broke and hurting".
295	Brent Stewart	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		Cut staff as the government is doing.
		Cut wasteful spending "must have's, not nice to have's".
296	Brian Kennard	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter is:
		against moving from land value to capital value,
		against putting all finance into one pot,
		of the view that ES needs to work with its budget.

No.	Name	Submission
		Shareholding in South Port - submitter suggests that dividends are used to support the community and all money earned is reinvested in the region.
		Financial Strategy - submitter notes: • ES cannot rely on the central government to grant 75% of infrastructure; • Should be reducing and not increasing debt.
		Fees and charges - submitter requested a review of consultants, as believe ES staff should be able to do their jobs.
		Significance and Engagement Policy - submitter states "if you believe the community play a crucial role in the decisions ES make, then why haven't we all received all policy documentation to all ratepayers?"
297	Karen Duytshoff	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		Capital value rating - submitter does not agree with the proposed move to Capital Value and notes further rate increases are beyond an already tight budget.
298	Phil Proctor	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter notes that on a fixed income pension, the proposed rate increases would be "crippling". The submitter notes that ES should work within budget and questions "How many new Toyota Hilux's are you planning on buying?"
299	LJ Terry	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter requests: Farmers and contractors be able to extract gravel (will help with flooding); Decrease rates on winter grazing.
301	Phillipa Montgomery	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with any rate increases and suggests: • keeping the river mouths open; • maintain existing stop banks and clear willow from rivers.

No.	Name	Submission
		Pest control - submitter also notes have not seen pest control being done for a long time.
302	Mckitterick (Woolbuyer)	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		Rates increase - The submitter requests that the council does not increase rates, noting the impact and likely forced closure of businesses, ultimately reducing the rating income.
303	Monica Mckitterick	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		Rates increase - The submitter does not agree with the proposed rate increase and questions "why is the answer always to chuck more money at it".
304	R Skipper	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter notes that the proposal is "unaffordable".
305	Bradley Stewart	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter notes:
		Does not agree with the proposed rate changes and that people do not have "spare money in the current climate";
		• ES needs to reduce spending, staff and focus on only essential programmes. VWamarok utes are a "kick in the guts to ratepayers as cost tens of thousands more than others.".
306	Sue Allison	The submitter is strongly opposed to;
		Revenue and Finance Policy
		Shareholding in South Port NZ Ltd.
		Financial Strategy
		Fees & Charges
		Significance and Engagement Policy
		Representative review.

No.	Name	Submission
		The submitter believes ES should "do an internal audit/review within their own business".
307	Vincent Cullen	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		Rates increases - The submitter does not agree with the rate increases and believes that:
		the council must tighten its belt as the ratepayers are doing;
		focus on the basics;
		Freeze increases for the next 2 years – we are in recession.
308	Sam Grayson	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		Rates increases - The submitter is against rate increases and notes that people are having to choose between eating and paying bills.
		The submitter questions:
		"Why do all rates go into your 'big rates pots'"?
		"Why aren't our rates spent on improving our own town and surrounding areas"?
309	Anna Pulley	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter suggests using \$25m reserves to do urgent work only to Level 3.
		Capital value rating - The submitter does not agree with a move to a Capital Value rating and notes a personal impact of a 64% increase with the proposed changes.
310	Bruce Allison	The submitter is opposed to the proposed LTP and believes:
		It is draining on the community both financially and mentally;
		That a common-sense approach should be implemented.
311	Judy & Roger Gimblett	Capital value rating - submitters are strongly opposed to the proposal to move from a Land to a Capital value rating system.
		The submitters suggest a simple approach is to clear the gravel out of the river.

No.	Name	Submission
312	Helen McDonald	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter notes ES must look internally and get back to delivering basic services.
		The submitter questions:
		Why has it taken 30-40 years to decide to do something?
		Why adjust the uniform general charge down?
		Why hasn't inflation been factored in?
313	Leah Kennard	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
		Capital value rating – the submitter is opposed to the proposal to move to a Capital Value rating system and believes everyone will be impacted as costs are passed onto consumers.
		The submitter also notes that there has not been enough advertising of the Long-term Plan, particularly for ratepayers who don't use computers or have online access, nothing through mail or letters.
315	Lester & Gretchen	Flood Protection Infrastructure - Would like to see another option/view for investing in flood protection.
	Wilson	Capital value rating - submitters do not agree with the proposal to move from a Land value to a Capital value rating system. All should pay the same rates, those on fixed incomes cannot afford increases that are way above inflation.
		The submitters note:
		There is an expectation for ES to get back to basics, pull back to core work and restructure as 196 staff are not required to deliver. Co back to the catchment beard approach of removing and colling the gravel to fund the classics process.
		 Go back to the catchment board approach of removing and selling the gravel to fund the clearing process. ES should stop doing work that the Government have said they are going to revoke now.
		ES needs to be more efficient with the rates income currently received and stop wasteful spending.
		The submitters also note that the proposed 10-year plan should have been sent to every household to ensure all ratepayers were given the opportunity to read through what is proposed.

No.	Name	Submission
		"The way you have done it has been downright underhand".
317	Cooper Henderson	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with the proposals as rate increases will make it even more challenging for the average family.
320	(LATE)	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
	Lenore Morris	Capital value rating - The submitter does not agree with the proposal to move from Land Value to Capital Value rating.
		 Use \$25m to do urgent work to level 3 only. Flood protection needs to be realistic and achievable. Enhance our Civil Defence.
322	Michael Dobbie	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with the proposed increase noting neither farms nor businesses can 'sustain an increase of this size at this time' and believes any increase should be held off until they can be sustained.
324	(LATE) Nicole Wallace	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
	Nicole Wallace	The submitter acknowledges the management of flooding is important, but they question the approach when government is telling ministries to cut spending.
		The submitter questions:
		How much more data is really needed to make a start (flood protection)?
		Could pest control not be incentivised for farmers and hunters?
		Why the push on farm environmental management plans when current government are planning changes?
325	(LATE)	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
	Jaspreet Boparai	<u>Infrastructure Strategy</u> - submitter does not agree with the Infrastructure Strategy and approach to river management.

No.	Name	Submission
		<u>UAGC</u> - submitter does not agree with decreasing the UAGC in a hyper-inflation environment.
326	(LATE) Joanne Crack	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		<u>Capital value rating</u> - a=submitter is against the proposed change to Capital Value rating noting disincentivising farmers i.e. investing in wintering barn.
		Environment Southland needs to look internally to make cost savings and cuts.
327	(LATE) Colin Smith	Flood protection infrastructure - submitter supports the preferred option of increasing operating expenditure by \$2.3m per annum to be funded by a proposed new Flood Protection Rate.
		 Capital Value while seems a logical approach requires % adjustment where ratepayer gets no direct benefit pay less than those that do. Concerned that appear to be removing River Liaison Committees – losing local knowledge not available in ES staff that come and go.
		 Money raised within a catchment should stay in the catchment. Shareholding in Southport must not go below 51%.
328	Aimee Colvin	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter disagrees with the proposals noting that the increase is unaffordable for their family and believes there must be a better and less costly way to do the same job.
329	Unknown	Flood protection infrastructure - Would like to see another option/view for investing in flood protection.
		The submitter does not agree with the proposed flood protection charge or approach.