

Submission 1: Masta Maintenance Services (NZ) Ltd

Consent Held:

- WGN980038 A Discharge to Air from a dry abrasive blasting operation

<i>Current Charge</i>	$\$45 + \$120 = \$165$
<i>Proposed Charge</i>	$\$35 + \$140 = \$175$

Submission:

1. Want policy to remain the same as the existing policy.

Decision Requested:

1. No decision requested.

Wishes to be heard: **Yes**

Comment

1. With a few minor exceptions the proposed charging policy remains the same as the 1997 Resource Management Charging Policy. The principles and methods for determining the charges remain the same.

If the Proposed Policy is adopted Masta Maintenance Services will receive a \$10 (6%) increase in their consent monitoring and supervision charge. This increase spread over 6 years (from 1998 when the consent was granted to 2004 when the Policy will be reviewed), which equates to a 1% annual increase.

2. The Regional Council grants resource consents, which allow organisations and individuals to “appropriate” or use parts of public resources such as air, water, or the coast. Accordingly, any resource consent holder is obtaining a private benefit from the use of a public resource. No rental is charged for the use of that resource.

The Council’s Funding Policy recognises that it is unfair for ratepayers to fully subsidise resource users. The Funding Policy has set a cost recovery goal of 90% of the consent processing costs and 50% of all compliance monitoring costs. The proposed charge-out rate assists us to move towards that target.

It is important to note, that while the charge-out rate has increased, there have been compensatory decreases for many consent holders through lower customer service charges and reduced compliance charges for those with a good compliance record.

In addition, the resource management charges have not altered since 1997 and, if this policy is adopted, will not alter again until 2004. Therefore the 17% increase in charge out rate will be spread over 7 years, equating to 2.4% per annum.

The charge-out rate must be seen in its context. By way of comparison, in Wellington, specialist trades-people such as mechanics and electricians often cost \$40 to \$50 per hour. The rates charged by the major planning consultancy firms generally range from \$70 (usually for a recent graduate) to \$140 per hour. The government allows \$75 per hour for technical, scientific, or professional advice for regional development grants.

Submission 2: The Water Group, Wellington Regional Council

Consents Held:

- WGN970036 A Water Permit to take water from the Waiwhetu Aquifer (Waterloo)

<i>Current Charge</i>	$\$20 + \$0 + \$48,808.50 = \$48,828.50$
<i>Proposed Charge</i>	$\$35 + \$0 + \$39,704.40 = \$39,739.40$

- WGN970036 A Water Permit to take water from the Waiwhetu Aquifer (Gear Island)

<i>Current Charge</i>	\$20
<i>Proposed Charge</i>	\$35

- WGN770100 A Water Permit to take water from the Wainuiomata River

<i>Current Charge</i>	$\$20 + \$1036.34 = \$1056.34$
<i>Proposed Charge</i>	$\$35 + \$2850 = \$2885$

- WGN770100 A Water Permit to take water from the Orongorongo River

<i>Current Charge</i>	$\$20 + \$2947 = \$2967$
<i>Proposed Charge</i>	$\$35 + \$2130 = \$2165$

- WGN770100 A Water Permit to take water from the Hutt River

<i>Current Charge</i>	$\$20 + \$1900.10 = \$1920.10$
<i>Proposed Charge</i>	$\$35 + \$2394.30 = \$2429.30$

Note: Only the consents referred to in this submission have been listed.

Submission:

1. Calculation of SOE Charges - Waiwhetu Aquifer: Total amount abstracted from aquifer calculated to be 1118l/s however the Water Group has consent to take 1331 l/s.
2. Calculation of SOE Charges – Hutt, Wainuiomata and Orongorongo Rivers: The SOE cost factors has been calculated using the amount of water currently abstracted from the catchment. New consents are currently being applied for which allow for more water to be abstracted from the rivers. Therefore if the cost factors remains the same the Water Group will be paying considerably more than the SOE charge due to consent holders

Decision Requested:

1. Waiwhetu Aquifer: Either calculate the SOE cost factor on consented instantaneous maximum flows or on rolling average daily takes.
2. Hutt, Wainuiomata and Orongorongo Rivers: Calculation of SOE cost factor should take account of major new resource consent applications already submitted.

Alternatively a mechanism should be incorporated in the scale of charges for making adjustments to the SOE cost factors when significant changes occur to the amount of water consented to be taken.

Wishes to be heard: Yes

Comment

1. In their submission the Water Group have recalculated their charges based on the maximum instantaneous rate of take (as required by the 1997 Charging Policy). Since 1997 the way in which the Council manages the Waiwhetu Aquifer has changed. We now manage it, in terms of allocation, on a yearly basis rather than looking at the instantaneous rates.

Consequently, we have altered the way the SOE cost factor is calculated. We now look at the total amount of water allocated in a year (35257688 m³/year) and converting that figure to an average instantaneous value $(35257688 * 1000 / (365 * 86400)) = 1118$ litres per second). The same process is followed to calculate each individual users proportion of the 1118 litres per second.

We believe this results in a fairer charge for all parties.

2. The Water Group have identified a potential problem with the Proposed Charging Policy for SOE charges in the Hutt, Wainuiomata and Orogorongoro Rivers. While there can be no guarantees that the Water Group will renew their consents on the terms and conditions that they have requested, if they were to do so their SOE Monitoring Charge will be almost three times that due to consent holders.

While we had expected some variation in charges as new consents are granted and existing ones expire, a potential change of this magnitude was unforeseen and would be unfair.

In this case the intent of the policy would be met if the SOE cost factors were not invoked. That would allow the Council to recover the required proportion of SOE Monitoring Charges from the Water Group.

Submission 3: Citizens Watch – Max Shierlaw

Consent Held:

- No consents held by Citizens Watch

Submission:

1. Wellington Regional Council should not be passing on such large increases onto the community.
2. Increases are anti business and a disincentive to invest in the region.
3. RMA functions should be contracted out in order to introduce competition and keep charges acceptable.

Decision Requested:

1. Charge-out rates and application charges be maintained at present levels.

Wishes to be heard: **Yes**

Comment

1. The Regional Council grants resource consents, which allow organisations and individuals to “appropriate” or use parts of public resources such as air, water, or the coast. Accordingly, any resource consent holder is obtaining a private benefit from the use of a public resource. No rental is charged for the use of that resource.
2. The Council’s Funding Policy recognises that it is unfair for ratepayers to fully subsidise resource users. The Funding Policy has set a cost recovery goal of 90% of the consent processing costs and 50% of all compliance monitoring costs. The proposed charge-out rate assists us to move towards that target.

It is important to note that while the charge-out rate has increased there have been compensatory decreases for many consent holders through lower customer service charges and reduced compliance charges for those with a good compliance record.

In addition, the resource management charges have not altered since 1997 and, if this policy is adopted, will not alter again until 2004. Therefore the 17% increase in charge out rate will be spread over 7 years, equating to 2.4% per annum.

The charge-out rate must be seen in its context. By way of comparison, in Wellington, specialist trades-people such as mechanics and electricians often cost \$40 to \$50 per

hour. The rates charged by the major planning consultancy firms generally range from \$70 (usually for a recent graduate) to \$140 per hour. The government allows \$75 per hour for technical, scientific, or professional advice for regional development grants.

2. Section 247D of the Local Government Act requires the Council to annually assess the costs and benefits of contracting out its services. In general the costs outweigh the benefits. However, section 4.4.8 of the Proposed Policy allows for suitably qualified and experienced independent consultants to collect and analyse monitoring data should the consent holder wish to have this done by someone other than the regional council. Unfortunately, few consent holders have taken up this option.

Contracting out services may not have the effect that Citizens Watch hopes for. Media reports suggest that in the Queenstown Lakes District there have been significant increases in resource management charges since it contracted out its consent processing functions.

Submission 4: Joe Taylor (Federated Farmers)

Consent Held:

- No consents specifically held by Federated Farmers, but many of the farmers they represent hold resource consents.

Submission:

1. Realise that charges for activities must be realistic so general rate payer is not helping to pay cost, but having to pay prices that are higher than the cost of inflation is unacceptable.
2. Cannot determine if charges are comparable to similar work in the private sector.
3. Some other Regional Councils charge differing hourly rates for various categories of staff doing the task.
4. Main concerns are lack of contestability and lack of knowing how long a consent is liable to take to process and therefore not able to accurately determine beforehand the reporting and investigating time that is likely to be taken.
5. Welcome the \$10 reduction in customer service charge for people who have a single consent, but believe it penalises those who are working away and require more consents.
6. Agree with extra penalty of paying for travelling cost for those who are not complying with their consent.
7. Do not believe that even in stressed catchments consent holders should pay the charge for the full cost of State of the Environment.

Decision Requested:

1. The question Councillors should ask themselves is 'What effect is this having on the New Zealand economy right now, as local body charges are a significant part of the non-tradable figures?'
2. Would like the Council to understand and take seriously the effects that high rates of cost increases have on those businesses that have no option but to accept international prices for the goods and services (tradable sector) that they produce.

Wishes to be heard: **Yes**

Comment

1. Federated Farmers have asked if the charges are comparable to similar work done in the private sector. By way of comparison, the rates charged by the major planning consultancy firms generally range from \$70 (for a recent graduate) to \$140 per hour. In 1996 the WRC experimented with using private sector planners to process resource consents. The charges levied by the consultants were between two and three times what the Council would expect the applications to cost. As a further comparison, media reports suggest that contracting out the consenting and compliance function in Queenstown Lakes District has resulted in a significant increase in resource consent charges.
2. Federated Farmers suggest that the charge-out rate should vary depending on the staff involved in processing the consent. In 1997 the Council considered the option of using a variable charge-out rate depending on the experience of the staff member involved. The option was rejected because we considered that it would be unfair for consent applicants. We have little control on when and what consent applications are passed to us for processing. That means that senior staff regularly process applications for minor works. We considered that it would be unfair for two consent holder to receive a different charge for processing similar applications simply because one was processed by a senior staff member and one by a junior one. By charging a flat rate, no matter who is processing a consent, consistency and equity is provided for all customers.

As an aside, some of the figures quoted in the Federated Farmers submission appear to be out of date. Canterbury Regional Council charge \$70 per hour for a consent officer, \$90 per hour for a scientist, and \$90 per hour for a managerial staff member. The proposed policy suggests \$70 per hour for a consent officer or scientist and the no charge is made for managerial time.

3. Federated Farmers are concerned by the lack of contestability of the process. Contestability in consent processing was part of the Resource Management Amendment Bill. However, the Select Committee has since removed those provisions. Nevertheless, Section 4.4.8 of the Proposed Policy already allows some contestability in compliance monitoring. Rather than restricting the collection and analysis of monitoring data to WRC officers Section 4.4.8 allows suitably qualified and experienced independent consultants to do some of that work if the applicant chooses. Unfortunately, few consent holders have taken up this option.
4. Federated Farmers also comment that there is uncertainty in how long a consent takes to process which means that they are unable to accurately determine the investigating and reporting time (and presumably the cost) for processing a given consent. Federated Farmers are correct in their assertion. However, the Policy contains a number of provisions to minimise the uncertainty.

For example, the application fees for non notified consents are based on the average number of hours taken to process that type of consent multiplied by the charge-out rate. Past experience suggests that these fees are a reasonably accurate estimate of the costs of processing non notified consents. The Consents Management Department estimates that the consent application fee covers all the costs of 80% of non notified consents.

In addition, we provide cost estimates for notified consents so that applicants have some certainty in that area. To improve their accuracy, these estimates are updated after the submission process and applicants advised of any likely changes.

Finally, it must be noted that in the vast majority of cases the applicant can exert considerable control over their consent processing charges by providing clear accurate information and consulting with affected parties. It is distressingly common for applicants to submit poor quality applications and not have consulted with affected parties.

5. In 1997 when the Council proposed the reduced customer service charge for multiple consents we thought there would be economies of scale associated with maintaining the consent records for multiple consent holders. We have found that multiple consent holders are far more active in making enquires about their consents, surrendering consents, and transferring consents. Consequently, multiple consent holders cost more per consent than those who hold a single consent. The Proposed Charging Policy more accurately reflects the true costs associated with multiple consent holders.
6. Federated Farmers do not consider that consent holders should pay the full cost of monitoring in stressed catchments. We agree with that premise and the Policy does not attempt to require consent holders to pay the full cost of SOE monitoring in stressed catchments.

Section 8.4.3 (page 55) of the Proposed Policy states that discharge to water consent holders in stressed catchments pay 10% of the SOE costs for monitoring surface water quality in those catchments and discharge to land consent holders pay 5% (section 8.5.3). Hence consent holders pay only 15% of the cost of SOE monitoring in stressed catchments.

Submission 5: D T S Riddiford

Consent Held:

- WAR94007501 Coastal Permit to Excavate CMA
Current Charge \$45 + \$90 + \$0 = \$135
Proposed Charge \$35 + \$0 + \$0 = \$35

- WAR94007503 Coastal Permit to Erect Structures
Current Charge \$20 + \$0 + \$0 = \$20
Proposed Charge \$35 + \$0 + \$0 = \$35

- WAR94007504 Coastal Permit to Dam Water
Current Charge \$20 + \$0 + \$0 = \$20
Proposed Charge \$35 + \$0 + \$0 = \$35

Submission:

1. Wants the principles in the submission to be considered when next setting Funding Policy. Ownership includes right of excluding others, therefore public can not be adversely affected.
2. Resource Management Act 1991 limits jurisdiction of Councils to effects and restricts Council to charging for carrying out of its functions. Should people have to pay for the use of a resource when they already own them?
3. The policy does not provide any explanation for the huge increase in the charge-out rate.

Decision Requested:

1. Respect for property rights should be written into the Introduction and reaffirmed throughout the Charging Policy by reducing charges where there are no effects on others of prescribed activities.
2. Charges should be subjected to a full cost benefit analysis in terms of Section 32 RMA.
3. Wants the Committee to resolve “Ruamahanga issues” by applying all the principles of the Charging Policy.
4. Abolish annual charges for the Aquiculture pond for the future and waive them for the past.

Wishes to be heard: **Yes**

Comment

1. The Funding Policy goes through a separate public process, Mr Riddiford can submit on the Funding Policy at the next review of the Funding Policy.
2. The Proposed Charging Policy does not deal with ownership of resources. It is merely intend to allow the Regional Council to recover some of the costs associated with administering the Resource Management Act 1991.
3. Section 32 Resource Management Act 1991 deals with assessing benefits and costs but in relation to part V which is Standards, Policy Statements and Plans, not administrative charges as provided for under part IV s36. It would be wrong in law to transpose the requirements of the two parts of the Act.
4. The Regional Council grants resource consents, which allow organisations and individuals to “appropriate” or use parts of public resources such as air, water, or the coast. Accordingly, resource consent holders are obtaining a private benefit from the use of a public resource. No rental is charged for the use of that resource.

The Council’s Funding Policy recognises that it is unfair for ratepayers to fully subsidise resource users. The Funding Policy has set a cost recovery goal of 90% of the consent processing costs and 50% of all compliance monitoring costs. The proposed charge-out rate assists us to move towards that target.

It is important to note that while the charge-out rate has increased there have been compensatory decreases for many consent holders through lower customer service charges and reduced compliance charges for those with a good compliance record.

In addition, the resource management charges have not altered since 1997 and, if this policy is adopted, will not alter again until 2004. Therefore the 17% increase in charge out rate will be spread over 7 years, equating to 2.4% per annum.

The charge-out rate must be seen in its context. By way of comparison, in Wellington, specialist trades-people such as mechanics and electricians often cost \$40 to \$50 per hour. The rates charged by the major planning consultancy firms generally range from \$70 (usually for a recent graduate) to \$140 per hour. The government allows \$75 per hour for technical, scientific, or professional advice for regional development grants.

Submission 6: Western Hove (Masterton District Council)

Consent Held:

Masterton District Council were charged for 50 resource consents in the 2000/2001 charging round. A summary of those consents are attached as appendix 1. Figures below are based on the 2000/2001 charges, not allowing for changes in consents.

<i>Total Charge 2000/2001</i>	\$26,269.29
<i>Total Proposed Charge</i>	\$27,794.32
<i>Total increase</i>	\$1,525.04

Submission:

1. Does not believe that the proposed charging policy adequately explains how the charges have been levied under the Resource Management Act 1991 and the LGA (No.3).
2. Believes that the proposed charging policy is “silent” on the explicit analysis undertaken by Wellington Regional Council to derive the Funding Policy.

Decision Requested:

1. Edit Sections 1 and 2 to include specific detail of the Wellington Regional Council Funding Policy as adopted in June 2000 and also define the specific charges, which the particular policy provisions apply to.
2. Justify how the ultimate 100% levels of charging have been set and what provisions have been made for confirming the reasonableness of such charging.

Wishes to be heard: **Yes**

Comment:

1. Masterton District Council is correct in that the Proposed Charging Policy is not clear on how the charges are influenced by the WRC Funding Policy prepared under the Local Government Amendment (No 3) Act 1996. It would be appropriate for the Proposed Charging Policy to state the relationship more clearly.
1. While it is not clearly outlined in the text, the Wellington Regional Council’s Funding Policy (adopted on 15 June 2000) provides the basis for the Proposed Resource

Management Charging Policy. A copy of the relevant sections of the Funding Policy is attached.

2. The WRC Funding Policy is quite clear. The Regional Council grants resource consents which allow organisations and individuals to “appropriate” or use parts of public resources¹ such as air, water, or the coast. Hence any resource consent holder is obtaining a private benefit from the use of a public resource. Accordingly, the Funding Policy concludes that the “Economically Efficient Funding Mechanism” is a 100% User Charge. However, the Funding Policy recognises that it would be unfair to allocate all the costs of resource consent processing and compliance monitoring to resource users. For example, most of the costs of appeals against a decision of the Council are borne by the community at large and not the applicant. In the compliance area the community bears to costs of such things as investigations which do not show a breach of consent conditions and many of the legal costs associated with enforcement action.
3. It is also important to note that the legislation relating to Funding Policies is of a general nature. Further, it contains provisions which allow the Council to deviate from the most economically efficient mechanism if it has good reason. The provisions of Section 36 (4) of the Resource Management Act 1991 are very specific in what the Council may charge for. In our view if there were a conflict between the two pieces of legislation, the legal principle of specific overriding general means that the provisions of section 36 of the Resource Management Act 1991 would override the general provisions of LGA (No3).

¹ This differs from many Territorial Authority resource consents where the public may be limiting an owners use of their private property.

**Submission 7:
George Ngatiamu Matthews (Aohanga Incorporation)**

Consent Held:

Aohanga Incorporation do not hold any resource consents but they do have 3 applications lodged that are currently on hold.

Submission:

1. Since the time of Kupe, the owners have enjoyed the undisturbed use and occupation of the Coastline, its Fisheries and outlying Reefs. The Incorporation object to the actions and philosophies of the Wellington Regional Council in ignoring the Incorporations role as Tangata Whenua under the Treaty of Waitangi and the RMA. They believe that the Wellington Regional Council is usurping their Kaitiaki role. They object to the present charging levels.

Decision Requested:

1. Reduce present charging levels.

Wishes to be heard: **Yes**

Comment

1. The Charging Policy is not intended to usurp any role of tangata whenua. It's purpose is to allow the Wellington Regional Council to recover some of its costs in relation to resource consent processing and environmental monitoring. The Government requires the Council to administer the Resource Management Act 1991 and allows it to charge fees to recover some of the costs associated with that task.
2. It would appear that concerns raised by the corporation (such as customary title of the foreshore and seabed) are fundamental constitutional and legal matters. The Council is unable to address that issue through the Proposed Policy.

Submission 8: J & P Hedley

Consent Held:

- WAR930010 Water Permit to Take Groundwater
Current Charge $\$45 + \$0 + \$79.79 = \124.79
Proposed Charge $\$35 + \$70 + \$145.36 = \250.36

- WAR970076 Discharge Permit to Land
Current Charge $\$20 + \$30 + \$5.82 = \55.82
Proposed Charge $\$35 + \$43 + \$6.14 = \84.14

- WAR920076 Water Permit to take Groundwater (Caldwell Trust)
Current Charge $\$20 + \$0 + \$367.21 = \387.21
Proposed Charge $\$35 + \$70 + \$348.09 = \453.09

- WAR990082 Discharge Permit to Land (Caldwell Trust)
Current Charge $\$45 + \$30 + \$0 = \75
Proposed Charge $\$35 + \$43 + \$0 = \78

Submission:

1. No reason given why charges need to increase.
2. Council should look at ways of reducing these costs such as contracting some/all of the work out.
3. Some of the large increases in SOE fees look like the Council is trying to stop activities in certain locations.

Decision Requested:

1. That charges be reduced.

Wishes to be heard: **Yes**

Comment

1. The Regional Council grants resource consents, which allow organisations and individuals to “appropriate” or use parts of public resources such as air, water, or the coast. Accordingly, any resource consent holder is obtaining a private benefit from the use of a public resource. No rental is charged for the use of that resource.

The Council's Funding Policy recognises that it is unfair for ratepayers to fully subsidise resource users. The Funding Policy has set a cost recovery goal of 90% of the consent processing costs and 50% of all compliance monitoring costs. The proposed charge-out rate assists us to move towards that target.

It is important to note that while the charge-out rate has increased there have been compensatory decreases for many consent holders through lower customer service charges and reduced compliance charges for those with a good compliance record.

In addition, the resource management charges have not altered since 1997 and, if this policy is adopted, will not alter again until 2004. Therefore the 17% increase in charge out rate will be spread over 7 years, equating to 2.4% per annum.

The charge-out rate must be seen in its context. By way of comparison, in Wellington, specialist trades-people such as mechanics and electricians often cost \$40 to \$50 per hour. The rates charged by the major planning consultancy firms generally range from \$70 (usually for a recent graduate) to \$140 per hour. The government allows \$75 per hour for technical, scientific, or professional advice for regional development grants.

2. Section 247D of the Local Government Act requires the Council to annually assess the costs and benefits of contracting out its services. In general the costs outweigh the benefits. However, section 4.4.8 of the Proposed Policy allows for suitably qualified and experienced independent consultants to collect and analyse monitoring data should the consent holder wish to have this done by someone other than the regional council. Unfortunately, few consent holders have taken up this option.

Contracting out services may not have the effect that Mr Hedley hopes for. Media reports suggest that in the Queenstown Lakes District there have been significant increases in resource management charges since it contracted out its consent processing functions.

3. The Council has been very successful in reducing compliance costs for businesses. In 1997 when the current Charging Policy was introduced, the Council reduced annual compliance charges so that, across the Region, consent holders paid over \$100,000 less than they paid in 1996.

In addition, applicants are paying less for their resource consents. The average cost of a non-notified resource consent dropped from \$361 (1997/98) to \$342 (1998/9).

4. With the exception of the new SOE monitoring charge for air discharges in the Petone/Seaview area, the basis for SOE charges has not changed from the existing 1997 Policy. What has changed, is that some areas now have fewer or more resource consents which alters the proportion of the total SOE contribution paid by each individual consent holder (the SOE Cost Factor). The other material change is that in some parts of the region the Council has been required to increase its monitoring as a result of increased use of the resource by consent holders.

This is the case for one of Mr Hedleys groundwater take consents (WAR 930010) where increased monitoring of groundwater levels is now essential in the Tawaha groundwater zone, hence the SOE cost factor has risen. The cost of monitoring

groundwater in the Tawaha zone in the previous policy was \$1204. This was for monitoring groundwater levels in one automatic recorder monitoring bore. There are now two automatic recorder monitoring bores and one manual monitoring bore due to increase pressure and demand from resource users. There has been no increase in the monitoring cost an automatic recorder monitoring bore or manual monitoring bore or the level of cost passed onto resource users (30% of total cost).

5. Mr Hadley's charges are to increase under the Proposed Policy. The reasons for the increase are set out below. The Council believes that takes less than 40 litres/sec can have a significant effect on the groundwater resource hence they should be monitored. Previously only takes greater than 40 litres/sec were monitored under the previous Policy. Hence a new category of monitoring takes between 20 litres/sec and 40 litres/sec has been proposed, which involves monitoring the consents by undertaking an inspection once every three years. This category now applies to Mr Hedley's two groundwater take consents.

Closer inspection of this monitoring charge showed that the category 1 for groundwater takes compliance charges is inconsistent with the same category for surface water takes compliance charges. Two hours reporting time is required for groundwater takes whereas half an hour of reporting time is required for surface water takes. Hence the annual compliance charge for surface water takes (category 1) is \$35 while for groundwater takes (category 1) the annual compliance charge is \$70. To be fair and consistent it is proposed to lower the compliance monitoring charge for category 1 of groundwater takes from \$70 per annum to \$35 per annum.

The level of monitoring undertaken in the Tawaha zone is essential for ensuring the sustainable management of groundwater resources in this area. This is of considerable benefit to existing resource users including Mr Hedley who rely on this resource for the sustainability of their farming operations.

The proposed new charges for Mr Hedley's two groundwater take consents are:

- WAR930010 Water Permit to Take Groundwater

<i>Current Charge</i>	$\$45 + \$0 + \$79.79 = \124.79
<i>Proposed Charge</i>	$\$35 + \$70 + \$145.36 = \250.36
<i>Proposed New Charge</i>	$\$35 + \$35 + \$145.36 = \215.36
- WAR920076 Water Permit to take Groundwater (Caldwell Trust)

<i>Current Charge</i>	$\$20 + \$0 + \$367.21 = \387.21
<i>Proposed Charge</i>	$\$35 + \$70 + \$348.09 = \453.09
<i>Proposed New Charge</i>	$\$35 + \$35 + \$348.09 = \418.09

Other components of the annual charges not discussed above overall show very minor increase of 3%, which spread out over 7 years equates to 0.43% per annum.

**Submission 9:
James A Bicknell**

Consent Held:

- WAR850115 Water Permit to Take Surface Water
Current Charge $\$45 + \$180 + \$617.22 = \842.22
Proposed Charge $\$35 + \$35 + \$371.60 = \441.60^*

- WAR960205 Discharge Permit to Land
Current Charge $\$20 + \$30 + \$14.90 = \64.90
Proposed Charge $\$35 + \$43 + \$15.74 = \93.74

- WAR990249 Water Permit to Take Groundwater
Current Charge $\$20 + \$60 + \$0 = \80
Proposed Charge $\$35 + \$0 + \$0 = \35

Submission:

1. Some charges are excessive. Mr Bicknell believes his SOE charge will rise from \$617.00 to \$2,229.00.

Decision Requested:

No decision requested.

Wishes to be heard: **Yes**

Comment

1. Mr Bicknell is correct in his calculation of the increase in his charge. However, he has been able to receive a decrease in his SOE monitoring charge by renewing his water take consent (WAR850115) for a smaller quantity of water.

2. The SOE charge attributable to consent holders in the Papawai Catchment has risen from \$1203 to \$1802. In addition, the amount of water extracted in the catchment has also reduced. These two factors have resulted in an increase in the SOE cost factor from \$5.14 to \$18.58. As Mr Bicknell's consent has reduced in quantity, the overall effect is a 42% reduction in SOE cost for that particular consent.

Submission 10: A J Barton

Consent Held:

- WAR690452 Discharge Permit to Land
 - Current Charge* $\$45 + \$30 + \$2.91 = \77.91
 - Proposed Charge* $\$35 + \$43 + \$4.89 = \82.89
- WAR690453 Water Permit to Take Groundwater
 - Current Charge* $\$20 + \$0 + \$47.47 = \67.47
 - Proposed Charge* $\$35 + \$0 + \$86.48 = \121.48
- WAR980229 Water Permit to Take Groundwater
 - Current Charge* $\$20 + \$0 + \$120.97 = \140.97
 - Proposed Charge* $\$35 + \$70 + \$220.39 = \325.39

Submission:

1. Some charge increases are exorbitant and can not be justified.

Decision Requested:

1. That charges be held or reduced and Council seeks ways to cut costs/become more efficient.

Wishes to be heard: **Yes**

Comment

1. The Regional Council grants resource consents, which allow organisations and individuals to “appropriate” or use parts of public resources such as air, water, or the coast. Accordingly, any resource consent holder is obtaining a private benefit from the use of a public resource. No rental is charged for the use of that resource.

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In addition, the resource management charges have not altered since 1997 and, if this policy is adopted, will not alter again until 2004. Therefore the 17% increase in charge out rate will be spread over 7 years, equating to 2.4% per annum.

The charge-out rate must be seen in its context. By way of comparison, in Wellington, specialist trades-people such as mechanics and electricians often cost \$40 to \$50 per hour. The rates charged by the major planning consultancy firms generally range from \$70 (usually for a recent graduate) to \$140 per hour. The government allows \$75 per hour for technical, scientific, or professional advice for regional development grants.

2. Mr Barton's charges are to increase under the Proposed Policy. The reasons for the increase are set out below. The Council believes that takes less than 40 litres/sec can have a significant effect on the groundwater resource hence they should be monitored. Previously only takes greater than 40 litres/sec were monitored under the previous Policy. Hence a new category of monitoring takes between 20 litres/sec and 40 litres/sec has been proposed, which involves monitoring the consents by undertaking an inspection once every three years. This category now applies to Mr Barton's two groundwater take consents.

Closer inspection of this monitoring charge showed that the category 1 for groundwater takes compliance charges is inconsistent with the same category for surface water takes compliance charges. Two hours reporting time is required for groundwater takes whereas half an hour of reporting time is required for surface water takes. Hence the annual compliance charge for surface water takes (category 1) is \$35 while for groundwater takes (category 1) the annual compliance charge is \$70. To be fair and consistent it is proposed to lower the compliance monitoring charge for category 1 of groundwater takes from \$70 per annum to \$35 per annum.

With the exception of the new SOE monitoring charge for air discharges in the Petone/Seaview area, the basis for SOE charges has not changed from the existing 1997 Policy. What has changed, is that some areas now have fewer or more resource consents which alters the proportion of the total SOE contribution paid by each individual consent holder (the SOE Cost Factor). The other material change is that in some parts of the region the Council has been required to increase its monitoring as a result of increased use of the resource by consent holders.

This is the case for both of Mr Barton's groundwater take consents (WAR 690453 and WAR 980229) where increased monitoring of groundwater levels is now essential in the Tawaha groundwater zone, hence the SOE cost factor has risen. The cost of monitoring groundwater in the Tawaha zone in the previous policy was \$1204. This was for monitoring groundwater levels in one automatic recorder monitoring bore. There are now two automatic recorder monitoring bores and one manual monitoring bore due to increase pressure and demand from resource users. There has been no increase in the monitoring cost an automatic recorder monitoring bore or manual monitoring bore or the level of cost passed onto resource users (30% of total cost).

The level of monitoring undertaken in the Tawaha is essential for ensuring the sustainable management of groundwater resources in this area. This is of considerable benefit to existing resource users including Mr Barton who rely on this resource for the sustainability of their farming operations.

The proposed new charges for Mr Barton's groundwater take consent is:

- WAR980229 Water Permit to Take Groundwater

<i>Current Charge</i>	$\$20 + \$0 + \$120.97 = \140.97
<i>Proposed Charge</i>	$\$35 + \$70 + \$220.39 = \325.39
<i>Proposed New Charge</i>	$\$35 + \$35 + \$220.39 = \290.39

Submission 11: Whitby Coastal Estates Ltd

Consent Held:

- WGN000069 Land Use Consent to Culvert

<i>Current Charge</i>	$\$45 + \$90 = \$135$
<i>Proposed Charge</i>	$\$35 + \$105 = \$140$

- WGN000069 Water Permit to Divert

<i>Current Charge</i>	$\$20 + \$60 = \$80$
<i>Proposed Charge</i>	$\$35 + \$70 = \$105$

Submission:

1. No reason given why charges need to increase.
2. Principle should be 'How can we reduce compliance costs, give better value for money than we do now'?

Decision Requested:

1. Charges not increased, preferably reduced.

Wishes to be heard: **No**

Comment

1. The Regional Council grants resource consents, which allow organisations and individuals to "appropriate" or use parts of public resources such as air, water, or the coast. Accordingly, any resource consent holder is obtaining a private benefit from the use of a public resource. No rental is charged for the use of that resource.

The Council's Funding Policy recognises that it is unfair for ratepayers to fully subsidise resource users. The Funding Policy has set a cost recovery goal of 90% of the consent processing costs and 50% of all compliance monitoring costs. The proposed charge-out rate assists us to move towards that target.

It is important to note that while the charge-out rate has increased there have been compensatory decreases for many consent holders through lower customer service charges and reduced compliance charges for those with a good compliance record.

In addition, the resource management charges have not altered since 1997 and, if this policy is adopted, will not alter again until 2004. Therefore the 17% increase in charge out rate will be spread over 7 years, equating to 2.4% per annum.

The charge-out rate must be seen in its context. By way of comparison, in Wellington, specialist trades-people such as mechanics and electricians often cost \$40 to \$50 per hour. The rates charged by the major planning consultancy firms generally range from \$70 (usually for a recent graduate) to \$140 per hour. The government allows \$75 per hour for technical, scientific, or professional advice for regional development grants.

2. The Council has been very successful in reducing compliance costs for businesses. In 1997 when the current Charging Policy was introduced, the Council reduced annual compliance charges so that, across the Region, consent holders paid over \$100,000 less than they paid in 1996.

In addition, applicants are paying less for their resource consents. The average cost of a non-notified resource consent dropped from \$361 (1997/98) to \$342 (1998/9).

Submission 12: Edward Cobb

Consent Held:

- WGN990068 Discharge Permit to Discharge to Land

<i>Current Charge</i>	$\$20 + \$115 = \$135$
<i>Proposed Charge</i>	$\$35 + \$130 = \$165$
- WGN990069 Discharge Permit to Discharge to Land

<i>Current Charge</i>	$\$45 + \$115 = \$160$
<i>Proposed Charge</i>	$\$35 + \$130 = \$165$

Submission:

1. Proposed increase is daylight robbery.
2. Many people are unable to pass these costs on.

Decision Requested:

No decision requested.

Wishes to be heard: No

Comment

1. The above figures show that if this Proposed Policy was adopted, Mr Cobb's charges would increase by \$35 (from \$295 to \$330). This increase is over a seven-year period and equates to \$5 (or 1.7%) per annum.
2. The Regional Council grants resource consents, which allow organisations and individuals to "appropriate" or use parts of public resources such as air, water, or the coast. Accordingly, any resource consent holder is obtaining a private benefit from the use of a public resource. No rental is charged for the use of that resource.

The Council's Funding Policy recognises that it is unfair for ratepayers to fully subsidise resource users. The Funding Policy has set a cost recovery goal of 90% of the consent processing costs and 50% of all compliance monitoring costs. The proposed charge-out rate assists us to move towards that target.

It is important to note that while the charge-out rate has increased there have been compensatory decreases for many consent holders through lower customer service charges and reduced compliance charges for those with a good compliance record.

In addition, the resource management charges have not altered since 1997 and, if this policy is adopted, will not alter again until 2004. Therefore the 17% increase in charge out rate will be spread over 7 years, equating to 2.4% per annum.

The charge-out rate must be seen in its context. By way of comparison, in Wellington, specialist trades-people such as mechanics and electricians often cost \$40 to \$50 per hour. The rates charged by the major planning consultancy firms generally range from \$70 (usually for a recent graduate) to \$140 per hour. The government allows \$75 per hour for technical, scientific, or professional advice for regional development grants.

Submission 13: Britannia Sea Scout Group

Consent Held:

- WGN980155 A Coastal Permit for a boatshed

<i>Current Charge</i>	\$45 + \$60 = \$105
<i>Proposed Charge</i>	\$35 + \$70 = \$105

- WGN980155 A Coastal Permit to use boatshed as a clubhouse

<i>Current Charge</i>	\$20 + \$60 = \$80
<i>Proposed Charge</i>	\$35 + \$70 = \$105

- WGN000148 A Coastal Permit for a mooring

<i>Current Charge</i>	\$20
<i>Proposed Charge</i>	\$35

Submission:

1. Resource Consent fees should be reduced for organisations that are trying to help the community.

Decision Requested:

2. Resource Consent fees should be reduced for organisations that are trying to help the community.

Wishes to be heard: **No**

Comment

1. A number of organisations who hold resource consents from the Council could argue that they are trying to help the community and should receive a discount or no charge. In most cases, the primary beneficiaries of these consents are the group members themselves.

From a practical perspective it would be difficult to determine which groups should be eligible for such a rebate. To use a WRC example, the Water Group could claim a reduced charge on the premise that they provide an essential public service (Bulk Water supply) on a non profit basis.

In our view it is appropriate for all consent holders to be treated on the same basis. However, if you choose to accept the Britannia Sea Scouts argument you will need to provide very clear criteria about who would qualify for these rebates.

**Submission 14:
F A Falconer**

Consent Held:

- WGN960557 A Coastal Permit for a Mooring

<i>Current Charge</i>	\$45
<i>Proposed Charge</i>	\$35

Submission:

1. Wants justification for charging \$140.00 to send one invoice per year.

Decision Requested:

No decision requested.

Wishes to be heard: **No**

Comment

1. We believe Mr Falconer has confused the application fee for a swing mooring renewal with the consent supervision and monitoring charge. Swing Moorings incur a Customer Service charge only. In Mr Falconer's case he would receive a \$10 per annum reduction in charges if the Proposed Charging Policy is adopted.

Submission 15: Gerard McLaughlan

Consent Held:

- WGN000081 A Land Use Consent for Bank Protection Works

<i>Current Charge</i>	\$45 + \$90 = \$135
<i>Proposed Charge</i>	\$35 + \$105 = \$140

Submission:

1. There should only be one charge when applying for consent and not being charged every time an officer arrives on-site.

Decision Requested:

No decision requested.

Wishes to be heard: **No**

Comment

1. There are two charges associated with resource consents. One for processing the consent and the other to ensure compliance with the conditions of the consent.

The Council considers it is fair that consent holders should be charged for compliance monitoring of their consent conditions. Some consents are more complex than others and therefore require more monitoring.

The Council does not charge for random inspections. Additional compliance charges are only ever incurred if on the return visit conditions of the consent are still not being complied with.

Submission 16: J Liddell

Consent Held:

- WGN960668 A Coastal Permit for a Boatshed and Jetty

<i>Current Charge</i>	\$45 + \$60 = \$105
<i>Proposed Charge</i>	\$35 + \$70 = \$105

Submission:

1. On the basis of the current charge-out rate being correct when instigated, then the inflation rate cannot sustain an increase of 16.66% when the true rate is only 30% of this proposed increase.

Decision Requested:

1. Rate increased only by true rate of inflation, or current accepted cost of living increase over this period, whichever is the lesser.

Wishes to be heard: **No**

Comment

1. If the Proposed Charging Policy is adopted there will be no change to J Liddell's annual charges between 1997 and 2004. That is considerably less than either the rate of inflation or cost of living increases.
2. The Regional Council grants resource consents, which allow organisations and individuals to "appropriate" or use parts of public resources such as air, water, or the coast. Accordingly, any resource consent holder is obtaining a private benefit from the use of a public resource. No rental is charged for the use of that resource.

The Council's Funding Policy recognises that it is unfair for ratepayers to fully subsidise resource users. The Funding Policy has set a cost recovery goal of 90% of the consent processing costs and 50% of all compliance monitoring costs. The proposed charge-out rate assists us to move towards that target.

It is important to note that while the charge-out rate has increased there have been compensatory decreases for many consent holders through lower customer service charges and reduced compliance charges for those with a good compliance record.

In addition, the resource management charges have not altered since 1997 and, if this policy is adopted, will not alter again until 2004. Therefore the 17% increase in charge out rate will be spread over 7 years, equating to 2.4% per annum.

The charge-out rate must be seen in its context. By way of comparison, in Wellington, specialist trades-people such as mechanics and electricians often cost \$40 to \$50 per hour. The rates charged by the major planning consultancy firms generally range from \$70 (usually for a recent graduate) to \$140 per hour. The government allows \$75 per hour for technical, scientific, or professional advice for regional development grants.

Submission 17: Monroe Springs - David Ronald

Consent Held:

- WGN760281 A Water Permit to take water for industrial purposes.

<i>Current Charge</i>	\$20
<i>Proposed Charge</i>	\$35

- WGN930052 A Discharge to air of exhaust fumes from heating of metal and oil quenching.

<i>Current Charge</i>	$\$45 + \$120 = \$165$
<i>Proposed Charge</i>	$\$35 + \$140 + \$300 = \475

Submission:

1. Amount of pollutants from this plant is a quarter of what it was in 1997. With downturn of business and some local plants closing, air pollution has significantly reduced.
2. There is not a smog problem developing in the Hutt Valley.

Decision Requested:

1. Reduction in proposed fee increase.

Wishes to be heard: **No**

Comment

1. The addition of SOE charges for discharges to air in the Petone/Seaview area is new to the proposed charging policy. The new SOE charge has been suggested because air quality data from a site at the Huia Pool indicates that air quality is not ideal in the Hutt Valley and is approaching “alert” levels for Nitrogen Oxides. The Council is also concerned about the cumulative effects of air discharges in the Seaview area.
2. During the preparation of the 1997 Charging Policy consideration was given to introducing a State of the Environment Monitoring Charge for discharges to air. The charge did not proceed because there was insufficient information to determine what proportion of the pollutant load arose from consented activities. Since then the WRC has conducted an air emissions inventory. The inventory shows that industrial air discharges contribute between 2% and 29% of the pollutant load (depending on the contaminant). On average the industrial contribution is 11.2%.

3. The Policy suggests that air discharge consent holders in the Hutt Valley contribute 10% of the costs of SOE monitoring of air quality in the Hutt Valley. The charge only applies to the Petone/Seaview area as that is the only part of the region where the density of discharge to air permits is sufficiently high so that the potential cumulative effects of those discharges require further monitoring.

**Submission 18:
Larry Holmes**

Consent Held:

- WGN960666 A Coastal Permit for a swing mooring

<i>Current Charge</i>	\$45
<i>Proposed Charge</i>	\$35

Submission:

1. Individuals and companies that make a profit must pay their dues for services provided by the Council.
2. Recreational users pay mooring charges.
3. Already pay rates and there is only a little money left over for hobby purposes.

Decision Requested:

1. No decision requested.

Wishes to be heard: No

Comment

1. Under the Proposed Policy Mr Holmes would receive a \$10 (22%) decrease in the consent supervision and monitoring charge for his swing mooring.

Submission 19: Mark Ambrose

Consent Held:

- WGN960532 A Coastal Permit for a Boatshed and Jetty

<i>Current Charge</i>	\$45 + \$60 = \$105
<i>Proposed Charge</i>	\$35 + \$70 = \$105

- WGN960533 A Coastal Permit for a Slipway

<i>Current Charge</i>	\$45 + \$60 = \$105
<i>Proposed Charge</i>	\$35 + \$70 = \$105

Submission:

1. Not to increase charges for a notified coastal activity.
2. Charges should be kept at 1997 levels.

Decision Requested:

1. Keep hourly rate at \$60 per hour.
2. Slightly increase cost of certificate of compliance.
3. Keep coastal permit charges at 1997 rates.

Wishes to be heard: **No**

Comment

1. The increase in deposit for notified consents has largely been driven by the increase in cost of notification and the proposed increase in the charge out rate. Prices for advertising a resource consent application have risen from approximately \$700-800 to around \$1200 since 1997.

It has proven extremely difficult to reduce advertising costs. The legislation is very specific about what must be included in an advertisement and any failure can make the consent null and void. However, the Council has asked Parliament for law changes, which would reduce the cost of advertising. If those changes are enacted there is likely to be a reduction in the costs of some applying for notified resource consents.

The above figures show that if the Proposed Policy is adopted, Mr Ambrose's consent supervision and monitoring charge will not change between 1997 and 2003.

2. The proposed increase in the application fee for a certificate of compliance is intended to more realistically represents the cost of processing these applications. The 1997 Policy underestimated the time that it takes to process a certificate of compliance and accordingly we have had to raise an additional charge to certificate of compliance applicants.

**Submission 20:
Bruce Patrick**

Consent Held:

- WAR920009 Water Permit to Take Surface Water
Current Charge $\$20 + \$0 + \$545.05 = \565.05
Proposed Charge $\$35 + \$35 + \$688.40 = \758.40

- WAR980018 Discharge Permit to Land
Current Charge $\$45 + \$90 + \$5.89 = \140.89
Proposed Charge $\$35 + \$105 + \$6.22 = \146.22

- WAR99001801 Water Permit to Take Groundwater
Current Charge $\$20 + \$60 + \$90 = \170
Proposed Charge $\$35 + \$0 + \$73.95 = \108.95

- WAR99001802 Water Permit to Take Groundwater
Current Charge $\$20 + \$60 + \$150 = \230
Proposed Charge $\$35 + \$70 + \$123.25 = \228.25

- WAR990087 Discharge Permit to Water
Current Charge $\$20 + \$229 + \$11.81 = \260.81
Proposed Charge $\$35 + \$342 + \$14.63 = \391.63

Submission:

1. The charge-out rate shows nothing to benchmark against.
2. A 17% increase in charge-out rate is too high.
3. The customer service charge should be one flat rate, no matter how many consents you hold.
4. Compliance monitoring should be able to be carried out by suitably qualified independent people to provide competition.

Decision Requested:

No decision requested.

Wishes to be heard: **No**

Comment

1. The Regional Council grants resource consents, which allow organisations and individuals to “appropriate” or use parts of public resources such as air, water, or the coast. Accordingly, any resource consent holder is obtaining a private benefit from the use of a public resource. No rental is charged for the use of that resource.

The Council’s Funding Policy recognises that it is unfair for ratepayers to fully subsidise resource users. The Funding Policy has set a cost recovery goal of 90% of the consent processing costs and 50% of all compliance monitoring costs. The proposed charge-out rate assists us to move towards that target.

It is important to note that while the charge-out rate has increased there have been compensatory decreases for many consent holders through lower customer service charges and reduced compliance charges for those with a good compliance record.

In addition, the resource management charges have not altered since 1997 and, if this policy is adopted, will not alter again until 2004. Therefore the 17% increase in charge out rate will be spread over 7 years, equating to 2.4% per annum.

The charge-out rate must be seen in its context. By way of comparison, in Wellington, specialist trades-people such as mechanics and electricians often cost \$40 to \$50 per hour. The rates charged by the major planning consultancy firms generally range from \$70 (usually for a recent graduate) to \$140 per hour. The government allows \$75 per hour for technical, scientific, or professional advice for regional development grants.

2. Customer Service Charge – This charge is to cover the costs associated with surrenders, transfers etc. which are not directly charged for. As each consent is a stand-alone unit, the costs are levied per consent, not per user. Most consents take about the same time to maintain, if we were to charge on a per customer basis, the charge would have to be raised for those people who hold only one consent to cover the costs of customers with multiple consents. Customers with one or two consents would be subsidising those with several.
3. Section 247D of the Local Government Act requires the Council to annually assess the costs and benefits of contracting out its services. In general the costs outweigh the benefits. However, section 4.4.8 of the Proposed Policy allows for suitably qualified and experienced independent consultants to collect and analyse monitoring data should the consent holder wish to have this done by someone other than the regional council. Unfortunately, few consent holders have taken up this option.

Contracting out services may not have the effect that Mr Patrick hopes for. Media reports suggest that in the Queenstown Lakes District there have been significant increases in resource management charges since it contracted out its consent processing functions. Closer inspection of this monitoring charge showed that the category 1 for groundwater takes compliance charges is inconsistent with the same category for surface water takes compliance charges. Two hours reporting time is required for groundwater takes whereas half an hour of reporting time is required for surface water takes. Hence the annual compliance charge for surface water takes (category 1) is \$35 while for groundwater takes (category 1) the annual compliance charge is \$70. To be fair and consistent it is proposed to lower the compliance

monitoring charge for category 1 of groundwater takes from \$70 per annum to \$35 per annum.

The proposed new charges for one of Mr Patrick's groundwater take consent is:

- WAR99001802 Water Permit to Take Groundwater

<i>Current Charge</i>	$\$20 + \$60 + \$150 = \230
<i>Proposed Charge</i>	$\$35 + \$70 + \$123.25 = \228.25
<i>Proposed New Charge</i>	$\$35 + \$35 + \$123.25 = \193.25

Submission 21: K H & A J Sage

Consent Held:

- WAR920020 Discharge Permit to Land

<i>Current Charge</i>	$\$20 + \$38.33 + \$4.36 = \62.69
<i>Proposed Charge</i>	$\$35 + \$43 + \$4.60 = \82.60

- WAR960280 Water Permit to Take Groundwater

<i>Current Charge</i>	$\$45 + \$0 + \$505.79 = \550.79
<i>Proposed Charge</i>	$\$35 + \$70 + \$379.87 = \484.87

Submission:

1. Charge-out rate too high, can hire a digger and driver for less therefore feels that the charge-out rate can not be justified.
2. Council should be audited for lack of efficiency.
3. Public relationship of the Wellington Regional Council is below that of IRD.

Decision Requested:

No decision requested.

Wishes to be heard: **No**

Comment

1. The Regional Council grants resource consents, which allow organisations and individuals to “appropriate” or use parts of public resources such as air, water, or the coast. Accordingly, any resource consent holder is obtaining a private benefit from the use of a public resource. No rental is charged for the use of that resource.

The Council’s Funding Policy recognises that it is unfair for ratepayers to fully subsidise resource users. The Funding Policy has set a cost recovery goal of 90% of the consent processing costs and 50% of all compliance monitoring costs. The proposed charge-out rate assists us to move towards that target.

It is important to note that while the charge-out rate has increased there have been compensatory decreases for many consent holders through lower customer service charges and reduced compliance charges for those with a good compliance record.

In addition, the resource management charges have not altered since 1997 and, if this policy is adopted, will not alter again until 2004. Therefore the 17% increase in charge out rate will be spread over 7 years, equating to 2.4% per annum.

The charge-out rate must be seen in its context. By way of comparison, in Wellington, specialist trades-people such as mechanics and electricians often cost \$40 to \$50 per hour. The rates charged by the major planning consultancy firms generally range from \$70 (usually for a recent graduate) to \$140 per hour. The government allows \$75 per hour for technical, scientific, or professional advice for regional development grants.

Submission 22: Elaine Gooding

Consent Held:

- WAR700080 Discharge Permit to Land

<i>Current Charge</i>	$\$45 + \$90 + \$5.82 = \135
<i>Proposed Charge</i>	$\$35 + \$105 + \$0 = \140

Submission:

1. Resource management is becoming such a burden to farmers. By increasing costs Wellington Regional Council are adding to the burden and making it more difficult for farmers to get Consents. It is encouraging a “don’t want to know” attitude in farmers.
2. Farmers know they need to look after the environment and resources.
3. Regulations and costs are making it impossible to comply with correct procedures.

Decision Requested:

No decision requested.

Wishes to be heard: No

Comment

1. The above figures show that if this Proposed Policy was adopted, Ms Gooding’s charges would increase by \$5 (from \$135 to \$140). This increase is over a seven-year period and equates to \$0.71 (or 0.53%) per annum.

The Regional Council grants resource consents, which allow organisations and individuals to “appropriate” or use parts of public resources such as air, water, or the coast. Accordingly, any resource consent holder is obtaining a private benefit from the use of a public resource. No rental is charged for the use of that resource.

The Council’s Funding Policy recognises that it is unfair for ratepayers to fully subsidise resource users. The Funding Policy has set a cost recovery goal of 90% of the consent processing costs and 50% of all compliance monitoring costs. The proposed charge-out rate assists us to move towards that target.

It is important to note that while the charge-out rate has increased there have been compensatory decreases for many consent holders through lower customer service charges and reduced compliance charges for those with a good compliance record.

In addition, the resource management charges have not altered since 1997 and, if this policy is adopted, will not alter again until 2004. Therefore the 17% increase in charge out rate will be spread over 7 years, equating to 2.4% per annum.

The charge-out rate must be seen in its context. By way of comparison, in Wellington, specialist trades-people such as mechanics and electricians often cost \$40 to \$50 per hour. The rates charged by the major planning consultancy firms generally range from \$70 (usually for a recent graduate) to \$140 per hour. The government allows \$75 per hour for technical, scientific, or professional advice for regional development grants.

2. The Council has been very successful in reducing compliance costs for businesses. In 1997 when the current Charging Policy was introduced, the Council reduced annual compliance charges so that, across the Region, consent holders paid over \$100,000 less than they paid in 1996.

In addition, applicants are paying less for their resource consents. The average cost of a non-notified resource consent dropped from \$361 (1997/98) to \$342 (1998/9).

Submission 23: M F Wall

Consent Held:

- WAR93003802 Water Permit to Take Surface Water
Current Charge $\$45 + \$0 + \$27.57 = \72.57
Proposed Charge $\$35 + \$0 + \$47.25 = \82.25

Note that if the take remained in the Otakura surface water zone the charge would have been $\$35 + \$0 + \$117.05 = \152.05

Submission:

1. The Otakura Catchment is not stressed between Dock Creek and Lake Wairarapa and therefore the SOE charges should not be raised for that part of the catchment.
2. That part of the catchment has very reliable summer flows and does not require monitoring.

Decision Requested:

1. That charges to take surface water from Otakura Stream between Lake Wairarapa and Dock Creek, not be raised.

Wishes to be heard: **No**

Comment

1. Mr Wall is correct in his submission as the Otakura Stream between Lake Wairarapa and Dock Creek is more representative of flow in Dock Creek. Accordingly, during the preparation of the Proposed Policy we reclassified his take into the Tauherenikau surface water management zone.