



**Submissions on Queenstown Lakes
District Council Draft Significance and
Engagement Policy 2014**

Full Name:

basil Walker

Would you like to see the final policy?

Yes

I agree with the draft policy.

Neither agree nor disagree

Please comment below.

Under the Issue;

1) ASSESSMENT & THRESHOLD.

I believe and request that the impact of INTEREST on BORROWINGS is a significant issue and must be included as an Issue .

QLDC has avoided detailing and including THE COST OF INTEREST because I believe that the true cost of construction is shielded to have a more acceptable cost placed before the public .

This has been the issue with the Queenstown Convention Centre where the cost of Interest on the stated borrowings is over the term of the loan \$105Million when extrapolated using the Councils figures of 35 million dollars x 50 years x 6.5%.

To state the cost of construction is \$35 million is seriously misleading and reckless management.

2 CONSULTATION

The QLDC has extensively used consultants who write epistles that contain extensive cut and paste from other consultants instead of concise factual reports .

I believe any potential plagiarism from cut & paste or identical data should be shaded in the reports because the continued use of this practice is using data that consistently has not been verified and is just reinforcing unproven data by continual repetition .

The reports contain extensive background geography data about Queenstown that is something that could be standardized to contain costs

I believe all reports should have an executive summary and a statement that if the report is proven to be factually incorrect or seriously misleading then the QLDC has the right to require reimbursement .

The consultant "gravy train at considerable ratepayer cost " is a significant cost to ratepayers and should carry significant responsibility and expectation of creditability.

3 QLDC Asets

Please consider ; Wharves and Boat ramps , Multiple Carparking Areas as distinct from Kerb parking.

Basil Walker

Full Name:

Lorn Schmidt

Would you like to see the final policy?

Yes

I agree with the draft policy.

Neither agree nor disagree

Please comment below.

I am concerned about the type of thinking and assumptions made prior to the public consultation process starts.

Assumptions such as: 1. It being OK that council financially contribute, support or back private business propositions with rate payer money.

2. That rate payers approve of council projects that businesses should pay for independently. - Publicly vote on & publish results of that vote. eg Queenstown Events Centre has been approved & stated that Wanaka rate payers will be contributing to this. -What are approval/disapproval figures on this? Should be publicly notified. And what will be done to recoup the losses to rate payers? It will typically follow the predictable track of the Dunedin stadium, overstated predictions of financial success.

3. That often projects are overpriced & low spec. so that big profits go to the builders.

4. That public consultation is unveiled after too much has been pre-planned, making the consult process shallow & facile. eg the Fulton Hogan Drying facility to be located at Luggate. Luggate people fundamentally don't want Wanaka waste. The discussion of high tech processing of waste to benefit Wanaka, at Wanaka was never seriously considered. Another old fashioned but expensive way to NOT DEAL with the waste as a local asset has been approved.

I want to see championing of modern science & engineering methods, so many examples are available to view in online engineering journals.

Not just keep thinking everything can be sorted out with a digging machine & lots of diesel.

Publish requests for suggestions on project before the fact, not after you have settled on a plan with a developer.

Cheers,

Lorna Schmidt

SUBMISSION

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To: Queenstown Lakes District Council

Submission on: Draft Significance and Engagement Policy

From: Federated Farmers Otago Province

Date: 31 October 2014

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SUBMISSION TO QUEENSTOWN LAKES DISTRICT COUNCIL ON THE DRAFT SIGNIFICANCE AND ENGAGEMENT POLICY

Summary of submission

Assessment Criteria

We ask that Council adopt further criteria for significance as below (or words to similar effect):

- The likely degree of community interest in the proposal or decision
- The extent to which the consequences of the decision might be controversial
- The potential impact on current and future interests of the community
- The extent to which residents, ratepayers or a sub-group of residents or ratepayers might be affected by the proposal or decision

Specific policies

Federated Farmers agrees with the policies proposed in respect to Strategic Assets and Methods for consultation/engagement. We agree there should be policies outlining “When Council will not consult or engage”. However, we seek the following amendments.

- In the first instance, the criteria around “*Decisions to act where it is necessary to*” (with five criteria following) should be simplified to: “*Decisions to act where it is necessary to comply with the law*”.
- Failing this we ask that Council remove reference to amenity, and qualify each of the criteria within this category, to give some indication of scale. We believe the remaining issues are appropriately addressed under the preceding criteria “*Decisions taken to manage an urgent issue*”.

We also believe it is appropriate to include specific consideration of the likely benefits from consultation, weighed against the costs, when deciding whether to consult. For example:

- Any matter where the costs of consultation materially outweigh the benefits of it.

Broader policies

Federated Farmers supports the proposed policies relating to Principles of Engagement, Providing Information, Hearings and Feedback and Changes to Significance and Engagement Policy.

Engagement tools

Federated Farmers broadly supports Council's proposed Engagement Tools. We ask that Council specifies “pre-consultation” engagement as a relevant tool, for issues requiring consultation.

Federated Farmers views the proposed process as iterative, with Council drawing upon use of the “other tools” outlined, and escalating issues (for instance, from “Information provided” to “Consultation”) as appropriate.

Introduction

- 1.1 Federated Farmers appreciates the opportunity to submit on Queenstown Lakes District's draft Significance and Engagement Policy. Effective Council engagement on key issues is a crucial factor to the success of our members, and for efficient and effective local governance.
- 1.2 Federated Farmers appreciates the drivers for change to consultation, enacted through the Local Government Amendment Act 2014. At times, consultation can be unwieldy and costly, with previous consultation requirements often resulting in large costs but little feedback or engagement from community members. We support the overall intent to provide for more flexible and effective engagement and consultation.
- 1.3 At the same time, Council's policies for engagement should reflect the fact local government decisions are made locally because there is a need for these decisions to reflect local preferences, expectations, concerns and challenges.
- 1.4 Exactly what constitutes 'effective engagement' will differ depending on the issue or issues under discussion, the perspective of the individual, the number of affected parties, and an assessment of whether the costs of consultation are justified by the significance of the issue. We consider it would be difficult to develop significance and engagement policies which appropriately account for all circumstances.
- 1.5 As a result, we see this process as a way of providing for engagement frameworks which allow for truly effective and nuanced discussions with members of the community, in a way that recognises the importance of these discussions and relationships to Council's decision making processes and those impacted by Council decisions.

2.1 Assessment

- 2.2 Council has proposed the following criteria for determining significance:
 - i. **Importance to the Queenstown Lakes District** – the extent to which the matters impact on the environment, culture and people of the District (eg significant capital projects).
 - ii. **Community Interest** – the extent to which individuals, organisations, groups and sectors in the community are affected by the Council's decisions.
 - iii. **Inconsistency with existing policy and strategy** – the extent of inconsistency and the likely impact.
 - iv. **The impact on the Council's capability and capacity** – the impact on the objectives set out in the Financial Strategy, Ten Year Plan and Annual Plan.
- 2.3 Federated Farmers agrees that these are relevant criteria. However, they are in general 'top down' considerations, which may (if implemented strictly) miss the 'demand side' concerns of particular ratepayers.
- 2.4 Criteria 'i' considers the impact to the District as a whole, where a more particular consideration of the impact on certain communities or individuals may at times be appropriate.

- 2.5 Criteria 'ii' considers the extent to which "individuals, organisations, groups and sectors" are affected, when it is often the likely perception of the significance of an issue that drives the views on whether consultation on an issue is appropriate.
- 2.6 Criteria 'iii' and 'iv' focus on divergence from current planning processes and impact on capability and capacity, respectively, and do not directly account for public perception over the significance of an issue. Taken together, there is potential for an issue to not completely fill any of these criteria, yet to nonetheless be regarded as being of significance to particular communities, groups or individuals.
- 2.7 Federated Farmers considers there is a need to break down the general intent contained in Criteria 'i' further, to provide for a wider range of specific instances. We note that Clutha District Council's draft criteria included the following criteria in an attempt to capture instances where public perception, or the impact on specific individuals or parts of the community, may be a material factor:
- *The likely degree of community interest in the proposal or decision...*
 - *The extent to which the consequences of the decision might be controversial...*
 - *The potential impact on current and future interests of the community.*¹
- 2.8 It would also be useful for Council's policies to provide for consultation where an issue is of significance to a specific and identifiable sub-set of ratepayers, for example:
- *The extent to which residents, ratepayers or a sub-group of residents or ratepayers might be affected by the proposal or decision...*
- 2.9 Federated Farmers agrees that a high level of consultation should not be required every time a particular issue is likely to be met with controversy. However, these are criteria against which staff are to make recommendations, with final decisions to remain the responsibility of elected members.
- 2.10 The criteria should therefore be as broad as is reasonably possible, with staff and elected members providing weight to the criteria, to ascertain what may be considered significant from a strategic perspective. Federated Farmers considers there is little practical risk in broadening the criteria for significance to ensure the perceptions of communities, organisations and individuals at the sub-District level may be appropriately considered.

Recommendations:

Council adopt further criteria for significance as below (or words to similar effect):

- **The likely degree of community interest in the proposal or decision**
- **The extent to which the consequences of the decision might be controversial**
- **The potential impact on current and future interests of the community**
- **The extent to which residents, ratepayers or a sub-group of residents or ratepayers might be affected by the proposal or decision.**

¹ Clutha District Council – Draft Significance & Engagement Policy, page 3

3.1 Specific policies

- 3.2 Strategic Assets - Federated Farmers agrees with both the criteria and Guidelines proposed in relation to consultation on Strategic Assets.
- 3.3 Methods for consultation/engagement – Federated Farmers notes Council's efforts to consult the community on preferred methods of communication, in May 2014. We commend Council on this step, support the proposed methods, and support the intention to “communicate across multiple channels to reach ratepayers and residents”.
- 3.4 When Council will not consult or engage – Federated Farmers supports Council's specific description of the times where community consultation will not be expected. There are times when Council has little or no choice on how or whether a process will be followed, or how particular responsibilities may be met, and it is important that the community, individuals and stakeholders understand there is no practical point in consultation. At other times, particularly in respect to operational matters, it is simply not practical or reasonable to provide for community input.
- 3.5 However, there is a need for further detail around not consulting around “*Decisions to act where it is necessary to* -
- *comply with the law;*
 - *save or protect life, health or amenity;*
 - *prevent serious damage to property;*
 - *avoid, remedy or mitigate an adverse effect on the environment;*
 - *protect the integrity of existing and future infrastructure and amenity*
- 3.6 The second, fourth and fifth criteria, as currently worded, would catch a broad swathe of instances where it should actually be a requirement to consult. There is no reasonable argument we are aware of to include amenity as an issue to sidestep consultation under the otherwise reasonable criteria to “*save or protect life, health or amenity*”. Amenity should be removed from this criteria.
- 3.7 Nor should consultation necessarily be avoided where there is a need to *avoid, remedy or mitigate an adverse effect on the environment*. In fact it is in these instances that consultation may more accurately identify methods for avoidance, remediation or mitigation of an adverse effect on the environment, particularly if the issue is not related to council owned activities. We consider the key issues are already addressed through other criteria outlining emergency situations; this criteria should either be deleted, or at least have some qualification of significance introduced, or the qualification that it relates to council owned assets only.
- 3.8 We similarly object to the fifth criteria “*protect the integrity of existing and future infrastructure and amenity*”. Even given the District's heavy reliance on amenity, it should not be assumed that some threat to amenity overrides Council's duty to consult. Yet again, the criteria lacks a benchmark for significance, with the concern this may unreasonably and unnecessarily override the fundamental requirement to consult.
- 3.9 The issues outlined in respect to “*Decisions to act where it is necessary to...*” and the criteria that follow are largely addressed in the third bullet point, “*Decisions taken to manage an urgent issue*”, with the exception of “*Decisions to act where it is necessary to... comply with the law*”. Federated Farmers believes the criteria in the fourth bullet point should be simplified to account for this aspect only.

2.11 We believe further criteria would be useful, where Council can clearly expect that the costs of consultation will outweigh the likely benefits. The cost of consultation to local government (in some instances) was a key issue driving the 2014 Local Government Amendment Act, and it may be useful to include a specific policy to allow Council to consider this issue, as below (or words to similar effect):

- *Any matter where the costs of consultation materially outweigh the benefits of it.*

Recommendations:

Federated Farmers agrees with the policies proposed in respect to Strategic Assets and Methods for consultation/engagement.

We agree there should be policies outlining “When Council will not consult or engage. However, we seek the following amendments.

- **In the first instance, the criteria around “*Decisions to act where it is necessary to*” (with five criteria following) should be simplified to: “*Decisions to act where it is necessary to comply with the law*”.**
- **Failing this we ask that Council remove reference to amenity, and qualify each of the criteria within this category, to give some indication of scale.**
- **We believe the remaining issues are appropriately addressed under the preceding criteria “*Decisions taken to manage an urgent issue*”.**

We also believe it is appropriate to include specific consideration of the likely benefits from consultation, weighed against the costs, when deciding whether to consult. For example:

- **Any matter where the costs of consultation materially outweigh the benefits of it.**

4.1 Broader policies

4.2 Principles of Engagement – Federated Farmers supports these proposed principles. They represent an appropriate set of principles against which to measure engagement and consultation, for issues that do not specifically require a Special Consultative Procedure.

4.3 Providing Information - This section sets out the expectations for information provided when the decision is made to consult. What is proposed?

- Why?
- What options we have?
- Our preferred option and why?
- Costs and rating impact if any.
- What are the impacts (if any)?
- How the community can have a say?
- The timeframe and process.
- How we will communicate the outcome?

- 4.4 Federated Farmers considers these represent reasonable and relevant pieces of information or questions to answer, when consulting on an issue.
- 4.5 Hearings and Feedback – Federated Farmers wholly supports Council’s proposed policies in respect to Hearings and Feedback. We note these go beyond what is required, but we consider the additional effort Council is proposing is necessary to provide for a fully informed, two way dialogue, and appropriate engagement over council issues.
- 4.6 We particularly support the proposal that hearings will be held in both Wanaka and Queenstown, for District wide issues, and that alternative methods of presenting to hearings will be provided for, by way of audio link or audio-visual link. Travel time can be a considerable barrier to engagement in council hearing processes, particularly for farmers and particularly at certain points of the year. Specifically allowing for hearings in both Wanaka and Queenstown (for District wide issues) and alternative methods of presenting, partially address these issues.
- 4.7 We ask that Council also consider rural area meetings for issues likely to specifically impact on primary production areas, although we do not consider it is necessary to adopt a specific policy to provide for these meetings.
- 4.8 Changes to Significance and Engagement Policy – Federated Farmers supports this proposed policy.

Recommendations:

Federated Farmers supports the proposed policies relating to Principles of Engagement, Providing Information, Hearings and Feedback and for Changes to Significance and Engagement Policy

5.1 Engagement tools

- 5.2 Federated Farmers broadly supports Council’s proposed Engagement Tools. We note the tools proposed for each level of engagement outline the required tools only, and that Council will draw upon “Other Methods” as outlined, where and when appropriate. We particularly encourage area based meetings for issues that are of particular relevance to the farming community, for example.
- 5.3 For issues categorised as requiring “consultation”, we suggest Council specifies “pre-consultation” engagement as a relevant tool, with the level and type of pre-consultation to fit the significance of the issue.
- 5.4 We expect that this would be an iterative process, and that Council staff and decision makers will be prepared to take on community, stakeholder and resident opinions as to the extent of an issue’s significance. This might mean an issue may require use of the “Other Methods” outlined, regardless of significance. This may mean Council escalates an issue from the “information on projects” category to the “consultation” category as a result of feedback received, where the time schedule and significance of feedback warrants this.

Recommendations:

Federated Farmers broadly supports Council’s proposed Engagement Tools.

We ask that Council specifies “pre-consultation” engagement as a relevant tool, for issues requiring consultation.

Federated Farmers views the proposed process as iterative, with Council drawing upon use of the “other tools” outlined, and escalating issues (for instance, from “Information provided” to “Consultation”) as appropriate.

6.1 About Federated Farmers

6.2 Federated Farmers welcomes the opportunity to comment on the Draft Significance and Engagement Policy.

6.3 Federated Farmers of New Zealand is a voluntary, member-based organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.

6.4 The Federation aims to add value to its members’ farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

Public Health South

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**SUBMISSION ON QUEENSTOWN LAKES DISTRICT COUNCIL
DRAFT SIGNIFICANCE AND ENGAGEMENT POLICY**

To: **Queenstown Lakes District Council**
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Queenstown 9348

Details of Submitter: **The Southern District Health Board**

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Our Reference: **14Oct06**

Date: **31 October 2014**

Introduction

Southern District Health Board (Southern DHB) presents this submission through its Public Health Service. This Service is the principal source of expert advice within Southern DHB regarding matters concerning Public Health. Southern DHB has responsibility under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities. Additionally there is a responsibility to promote the reduction of adverse social and environmental effects on the health of people and communities. With 4,250 staff, we are located in the lower South Island (South of the Waitaki River) and deliver health services to a population of 308,600.

Public health services are offered to populations rather than individuals and are considered a “public good”. They fall into two broad categories – health protection and health promotion. They aim to create or advocate for healthy social, physical and cultural environments.

This submission is intended to provide general commentary relating to the document, Queenstown Lakes District Council’s Significance and Engagement Policy.

General Comments

The Public Health Service wishes to highlight the value of working together with local government to consider the impact of various activities and plans on population health. The positive community health outcomes that can accrue when local government is cognizant of its potential to impact upon the health of citizens cannot be overstated.

We wish to commend the council for retaining and reviewing this document as it clearly outlines the process that QLDC follows on any issue, proposal, decision or other matter of significance. Without such guidance, residents and the wider community will have varying levels of understanding of not only the opportunities to contribute to the decision making process but also the varying pathways which may be used by council. We found the document well set out, easy to read, and comprehensive clearly describing the process followed by council staff when fulfilling the responsibilities of the 2002 Local Government Act.

Southern DHB expressed in our recent Annual Plan submissions¹ that staff within the Public Health Service would welcome the opportunity to work more closely with the council and reiterated this approach once again in our October 2014 letter regarding the QLDC Economic Development Strategy. This may be in the form of providing public health advice but we would also be happy to assist in the development of strategies or policies to enable a Health in all Policies (HiAP) approach to be applied by council. We value our existing relationships with staff within QLDC would like to build on this by supporting a HiAP approach being adopted by council.

HiAP is about promoting healthy public policy. It is a way of working across government to encourage all sectors to consider the health impacts of their policies and practices, and at the same time it examines the contribution that a healthier population can make towards achieving the goals of other sectors. Many of the problems facing our community today require collective government and community action and HiAP is an innovative way of working together for a common purpose.

The health sector is good at responding to and treating people with illness and injury but in order to prevent illness and injury and to improve the conditions which promote good health, a partnership between health and other sectors of government such as local and regional councils who have more influence over these conditions is needed. A local success story of this arrangement is the Canterbury Health in All Policies Partnership (CHIAPP)² which was established in 2009 and has membership from Community and Public Health, Christchurch City Council, Environment Canterbury and the local Primary Health Organisation. A number of activities have been undertaken over the past five years by CHIAPP such as the Canterbury Regional Policy Statement Health and Wellbeing Review, and Canterbury Transport Plan which involved the undertaking of a Health Impact Assessment.

Summary

The Public Health Service of the Southern DHB believe that the Queenstown Lakes District Council would support the overarching goal for Health in all Policies being *that it leads to a better place for everyone*. We welcome the opportunity to explore this approach further with council and together strive to promote this philosophy for our community in partnership.

We will wish to be heard in support of this submission

Yours sincerely,



Dr Leanne Liggett
Public Health Analyst

¹ 2013/14, 2014/15

² <http://www.cph.co.nz/About-Us/Health-in-all-Policies/> [accessed 1 October 2014]