

Full submissions pack (excl. late submissions)

Please note: URLs included in this submissions pack do not work, instead the content has been downloaded and is included alongside the relevant submission

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Respondent No: 2
Login: Anonymous

Responded At: Apr 12, 2024 11:17:59 am
Last Seen: Apr 12, 2024 11:17:59 am

- Q1. First name David
- Q2. Surname Allard
- Q3. Organisation (if any) Nil
- Q4. Contact email [REDACTED]
- Q5. Location Wānaka (Wānaka-Upper Clutha ward)
- Q6. Do you wish to speak at a hearing in support of your submission? No
- Q7. If yes, please provide a contact phone number not answered
- Q8. What is your position on proposed changes to Environmental Health fees? Neutral
- Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees
not answered
- Q10. What is your position on proposed changes to Aquatics fees? Neutral
- Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees
not answered
- Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees? Neutral
- Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?
not answered
- Q14. What is your position on proposed changes to Community Facility fees? Neutral
- Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees
not answered
- Q16. What is your position on proposed changes to Parks and Reserve fees? Neutral

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Neutral

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Neutral

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Oppose

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

A comparison of landing fees at similar airports for an aircraft <1500kg reveals that the current NZWF fee for an aircraft less than 1500kg (\$10) is very similar to the likes of Timaru and Oamaru. No detail is given as to what the new fee will be for that weight range but any increase at all would be out of step. The cost structure of Wanaka Airport has been increased by the burden of a management that is largely unnecessary. I suggest that the first step should be to reduce that overhead. An Annual Fee for regular GA users would be welcomed by many and reduce the overhead of individual invoices as is the current practice.

Q26. What is your position on proposed changes to Planning and Development fees? Neutral

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 7
Login: Admin

Responded At: May 02, 2024 06:40:33 am
Last Seen: May 06, 2024 01:09:22 am

Q1. First name	Mark
Q2. Surname	Ayre
Q3. Organisation (if any)	not answered
Q4. Contact email	[REDACTED]
Q5. Location	Wānaka (Wānaka-Upper Clutha ward)
Q6. Do you wish to speak at a hearing in support of your submission?	Yes
Q7. If yes, please provide a contact phone number	[REDACTED]
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

Supporting document attached

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/4119a7cb4db336caa0aae5f6d342e869fe19c695/original/1714596029/60f6070eb0454e62af424ba44991ccc6_Wanaka_Moori ng_submission_Mark_pdf.pdf?1714596029

Q30. I understand that my submission is considered public information

I understand

Tuesday, 30 April 2024

**Submission to proposed changes to user fees and charges
contained in QLDC Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Mark Ayre

Submitter e-mail: [REDACTED]

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for the increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some \$73,913.

Stated reasons given for the increase include the following:

Fees have not been reviewed since 2011 and administration costs have increased over time.

Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.

Good management of the mooring permits.

The reasons do not justify the increase

The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.

The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the entire mooring system. This involves checking the chain and mooring blocks. QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.

Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.

Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.

Details of mooring location and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates of mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.

The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings in a manner that complies with any and all resource consent conditions. This includes the inspection of the moorings. The Council does not need to inspect the moorings. It simply needs to be provided with details of the mooring inspection that has been arranged by the mooring owner. Use of moorings is at the risk of permit holders.

The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.

I seek the following outcome:

It is reasonable for there to some adjustment to the fee to account for inflation given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of \$350 should be maintained for the coming year.

Any further proposal to increase fees should be after a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do wish to appear and speak in support of my submission at the hearing, but only if this hearing is held in Wanaka.

Mark Ayre

30th April 2024



Respondent No: 51
Login: Admin

Responded At: May 08, 2024 14:04:05 pm
Last Seen: May 08, 2024 03:54:11 am

- Q1. **First name** Craig
- Q2. **Surname** Boniface
- Q3. **Organisation (if any)** not answered
- Q4. **Contact email** [REDACTED]
- Q5. **Location** Other (please specify)
Unknown
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
- Q7. **If yes, please provide a contact phone number** not answered
- Q8. **What is your position on proposed changes to Environmental Health fees?** not answered
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
- Q10. **What is your position on proposed changes to Aquatics fees?** not answered
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** not answered
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** not answered
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/e88977212316360818ba4d6f612a7d3f7e314a15/original/1715141024/273189b8fdb69b99aae9fcc9a507f0e3_Boniface_Craig_attachment_1.pdf?1715141024

Q30. I understand that my submission is considered public information I understand

Submission to proposed changes to user fees and charges contained in QLDC Statement of Proposal dated 5 April 2024

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: CRAIG DAVID BONIFACE

Submitter e-mail: [REDACTED]

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some \$73,913.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.
2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*. This involves checking the chain and mooring blocks. QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require

payment of an initial monitoring fee and monitoring fees thereafter, as applicable.

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of \$350 should be maintained for the coming year.
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do not (delete one) wish to appear and speak in support of my submission at the hearing.





Respondent No: 10
Login: Admin

Responded At: May 03, 2024 07:38:09 am
Last Seen: May 06, 2024 01:09:22 am

- Q1. First name lan
- Q2. Surname Brown
- Q3. Organisation (if any) not answered
- Q4. Contact email [REDACTED]
- Q5. Location Wānaka (Wānaka-Upper Clutha ward)
- Q6. Do you wish to speak at a hearing in support of your submission? No
- Q7. If yes, please provide a contact phone number not answered
- Q8. What is your position on proposed changes to Environmental Health fees? not answered
- Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees
not answered
- Q10. What is your position on proposed changes to Aquatics fees? not answered
- Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees
not answered
- Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees? not answered
- Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?
not answered
- Q14. What is your position on proposed changes to Community Facility fees? not answered
- Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees
not answered
- Q16. What is your position on proposed changes to Parks and Reserve fees? not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

Supporting document attached

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/2202b356d7e80ceefe4f435853077a62940a81c/original/1714685882/4b7c5f53f098e5da25bbeabfbbd3a7ba_Submission_QLDC__Mooring_permit_fee_increase.pdf?1714685882

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitted by Ian Brown

[REDACTED]

This submission relates to the proposal to increase fees for moorings.

Reasons for submission:

Statement of proposal and rationale for increase

The QLDC statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, we note 6% is to be privately funded and 95% public.

The table presented with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The presented reasons do not and can not justify the increase proposed.

1. The presented rationale fails to align with the Council's Revenue and Finance Policy and is thus flawed.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is questionable and appears primarily based on cost recovery for council inspections and monitoring. I submit that this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. why should mooring owners have to pay for the same inspection report twice?⁴
4. Concerns presented that moorings may have shifted or been moved are illogical unfounded and misplaced given the substantial weight (suggested minimum 1000kg) and stability of mooring blocks.⁵ There are no tides in a lake.
5. I submit The suggested 1000kg block requirement is unjustified in this environment. Given there is a maximum vessel size, the state of the lake terrain and the fact that "It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders " I submit guidelines only may be presented to mooring owners. Given that there is a "Mooring Block Weight calculator" I submit this format may be used as a guide rather than an arbitrary rule, so that owners can determine "fit for purpose" when undertaking their biannual checks. Ie Mooring weight must relate to vessel size and conditions. Ref: <https://calculator.academy/mooring-block-weight-calculator/>
6. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Those costs should be public funded as part of QLDC's greater regulatory and compliance functions and not apart of current owners costs.

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

7. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and **do not provide justification** for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶
8. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
9. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely guesstimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
10. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I Ian Brown, seek the following outcome:

- It is acceptable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year- 2024/25**
- Any further proposal to increase fees should not be made until there has been a comprehensive and **competent** review of all waterways charges, including mooring permits and associated obligations and undertaken by appropriately skilled personal.

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw

- Suggested costings should not be presented by council “revenue and finance policy” makers until consultation with professionals in the field and users representatives at least, have been involved in a full review and consultation process. I submit that must involve mooring owners perspectives.

I cannot appear to speak in support of my submission at the hearing.



Respondent No: 4
Login: Anonymous

Responded At: Apr 30, 2024 12:17:39 pm
Last Seen: Apr 30, 2024 12:17:39 pm

Q1. First name	Sandy
Q2. Surname	Brown
Q3. Organisation (if any)	not answered
Q4. Contact email	[REDACTED]
Q5. Location	Albert Town (Wānaka-Upper Clutha ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	Oppose
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	Neutral
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	Neutral
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	Oppose
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	Oppose

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Neutral

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Neutral

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

As long as local companies don't get forced put

Q26. What is your position on proposed changes to Planning and Development fees? Oppose

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 34
Login: Admin

Responded At: May 06, 2024 12:43:15 pm
Last Seen: May 06, 2024 01:09:22 am

- Q1. First name James
- Q2. Surname Burn
- Q3. Organisation (if any) not answered
- Q4. Contact email [REDACTED]
- Q5. Location Wānaka (Wānaka-Upper Clutha ward)
- Q6. Do you wish to speak at a hearing in support of your submission? No
- Q7. If yes, please provide a contact phone number not answered
- Q8. What is your position on proposed changes to Environmental Health fees? not answered
- Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees
not answered
- Q10. What is your position on proposed changes to Aquatics fees? not answered
- Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees
not answered
- Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees? not answered
- Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?
not answered
- Q14. What is your position on proposed changes to Community Facility fees? not answered
- Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees
not answered
- Q16. What is your position on proposed changes to Parks and Reserve fees? not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Oppose

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

As a user of Wanaka Airport for 20 plus years, predominantly using the grass, the increase in charges for my plane from \$15 to \$19 per landing is not justified when considering the charges for other airports. There are no lights on the runways, security is minimal and facilities are toilets, and I am a rate payer also. You should be encouraging people to come to Wanaka as a pleasant and fair place, and not to be known for trying to pass on price "blow outs" by hiking prices generally. It is time the council got more efficient, and used better contracts and contractors for works being undertaken, making precious dollars go further and set an example. Cut the number of cones by a 1/3! Finish works in a respectable time and to a high standard. Rata St / Aubery Rd ...over a year and re-digging up the road twice!!! Orchard Rd / Ballantyne Rdmonths!! Hawea turn-off years and huge expense. The issue is poor management of funds by not dealing with the real problem, " rip-off" contractors and not getting the work finished in a timely manner. Wanaka is more famous for its prices than its beauty now. WOF's are more expensive than anywhere else. Supermarket prices are higher than Queenstown. BP fuel prices for unsuspecting tourists are a disgrace. I do not add a premium to my fees for Wanaka residents...yet!! Thank you for considering these thoughts James Burn

Q26. What is your position on proposed changes to Planning and Development fees? not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 3
Login: Anonymous

Responded At: Apr 19, 2024 16:47:13 pm
Last Seen: Apr 19, 2024 16:47:13 pm

- Q1. First name Edward
- Q2. Surname Butler
- Q3. Organisation (if any) not answered
- Q4. Contact email [REDACTED]
- Q5. Location Kelvin Peninsula (Queenstown-Whakatipu ward)
- Q6. Do you wish to speak at a hearing in support of your submission? No
- Q7. If yes, please provide a contact phone number not answered
- Q8. What is your position on proposed changes to Environmental Health fees? Neutral
- Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees
not answered
- Q10. What is your position on proposed changes to Aquatics fees? Support
- Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees
I support as long as these facilities are given the upgrades they need. As with many Of the facilities in Queenstown they need more maintaining.
- Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees? Support
- Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?
As above I support as long as these facilities are given the upgrades they need. As with many Of the facilities in Queenstown they need more maintaining.
- Q14. What is your position on proposed changes to Community Facility fees? Support
- Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees
not answered
- Q16. What is your position on proposed changes to Parks and Reserve fees? Support

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Oppose

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

Parking is already wildly hard to find for all those who work to make Queenstown the destination it is. Increasing the Parking costs means that those who are working in town are unable to cover costs of their parking. Jobs in Queenstown do not pay enough for these costs as it is. Improve the reliability and useability of your public transport the bus stops on the kelvin peninsula are too far away and mean I am unable to use any public transportation to get to work.

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

I find the current infrastructure to be in poor condition many marks are missing lights, broken or missing. Wharves need attention, repair and upgrading. Channels need marking. It is important to focus on these as a priority for navigation safety.

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Neutral

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

I can't afford housing here anyway.

Q28. Do you have any other feedback relating to Council fees and charges?

Overall Queenstown although a beautiful destination as place to live is already unaffordable for its working residents. I don't believe it is fare to increase the charges of people who are already struggling to reduce the impact on the rate payers for some items. Parking for example is extremely hard to find in Queenstown and the public transport within Queenstown is not reliable enough to make it user friendly. The council should be working to add parks not remove them and make them more affordable so the cbd continues to attract guests, allow staff to Attend work which is vital to supporting businesses to stay afloat. If people can't park then they won't work in town, if they can't work in town businesses will close if businesses close it's not helping anyone. Please QLDC support your residents!!!

Q29. **If you have a pre-prepared submission you can upload it here** not answered

Q30. **I understand that my submission is considered public information** I understand



Respondent No: 21
Login: Anonymous

Responded At: May 05, 2024 06:46:03 am
Last Seen: May 05, 2024 06:46:03 am

Q1. First name	Sam
Q2. Surname	Chartres
Q3. Organisation (if any)	N/A
Q4. Contact email	[REDACTED]
Q5. Location	Wānaka (Wānaka-Upper Clutha ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Oppose

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

Would prefer a much more efficient annual bulk charge system to landing fees.

Q26. What is your position on proposed changes to Planning and Development fees? not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 16

Login: Anonymous

Responded At: May 03, 2024 12:43:45 pm

Last Seen: May 03, 2024 12:43:45 pm

- Q1. **First name** Peter
- Q2. **Surname** Coppens
-
- Q3. **Organisation (if any)** not answered
-
- Q4. **Contact email** [REDACTED]
-
- Q5. **Location** Fernhill/Sunshine Bay (Queenstown-Whakatipu ward)
-
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
-
- Q7. **If yes, please provide a contact phone number** not answered
-
- Q8. **What is your position on proposed changes to Environmental Health fees?** Support
-
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
-
- Q10. **What is your position on proposed changes to Aquatics fees?** Support
-
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
-
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** Support
-
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
-
- Q14. **What is your position on proposed changes to Community Facility fees?** Support
-
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
-
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** Support

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Support

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Support

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Support

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Support

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Support

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

There does not appear to be any ability to comment on fees relating to business using the mall and other CBD streets, footpaths for customer seating and to allow for comments on QLDC fees for Leases and fees to business using Council property or lands. In the event I am particularly concerned about the use of Shotover Street footpaths for extension of business seating, customer service and wait areas. It certainly appears contrary to the intended use of footpaths to make people have to use the road and or be inconvenience by business activity. Especially as Shotover Street footpaths are very busy and the footpaths are quite narrow. At least one business "Freg's" has had purpose built barriers built over the footpath, plus 3 car parks withdrawn to allow them to carry on their Burger business, but also extend further along the footpath. I trust the fee structure takes into account the loss of the revenue from 3 car parks, the use of 3/4 of the footpath. Any fees for the above use should be based on current commercial fees and not on some token payment based on a nod and a wink as currently appears to be occurring.

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 19
Login: Anonymous

Responded At: May 04, 2024 08:31:00 am
Last Seen: May 04, 2024 08:31:00 am

Q1. First name	john
Q2. Surname	cossens
Q3. Organisation (if any)	not answered
Q4. Contact email	[REDACTED]
Q5. Location	Wānaka (Wānaka-Upper Clutha ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Oppose

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

I refer specifically to the Variation of resource consent s127 fee of \$2,183 This seems a catch-all fee which does not merit the work involved for some minor consent variations. We were required to vary a consent for telecommunications from chorus copper wire to starlink, essentially a very minor change of provider and yet the only way to vary this was by way of paying the \$2,079 and then there were additional fees on top of that. As well, we were asked to provide an assessment of environmental effects for a Starlink dish which was simply bureaucratic nonsense. I would ask you split the consent condition variations into a 'minor' and 'major' fee with appropriate fees for both. For example, I note the Engineering acceptance and review fee is \$606, this would seem a far more sensible fee for a 'minor' consent condition variation.

Q28. Do you have any other feedback relating to Council fees and charges?

In general, is it appropriate to be increasing fees across the board by 5% when there is a well recognised cost of living crisis?

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 3
Login: Anonymous

Responded At: Apr 12, 2024 14:14:14 pm
Last Seen: Apr 12, 2024 14:14:14 pm

- Q1. First name keyl
- Q2. Surname Cunningham
- Q3. Organisation (if any) not answered
- Q4. Contact email [REDACTED]
- Q5. Location Wānaka (Wānaka-Upper Clutha ward)
- Q6. Do you wish to speak at a hearing in support of your submission? No
- Q7. If yes, please provide a contact phone number not answered
- Q8. What is your position on proposed changes to Environmental Health fees? Neutral
- Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees
not answered
- Q10. What is your position on proposed changes to Aquatics fees? Neutral
- Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees
not answered
- Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees? Oppose
- Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?
not answered
- Q14. What is your position on proposed changes to Community Facility fees? Neutral
- Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees
not answered
- Q16. What is your position on proposed changes to Parks and Reserve fees? Neutral

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

user pays system is equitable and sensible

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Oppose

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

where are local workers supposed to park???? PT or cycling is simply not an option for many for many and various reasons. CYcling ... when its snowing or raining or freezing cold? Bus - no route close to residence; need private transport due to scope of work, need for transport to collect children from after school;

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

increase totally unjustified. Inadequate totally unsatisfactory nonsensical reasons given. flow on effect for businesses relying on this asset, at a time where business is as tough as ever is unacceptable and will result in more businesses gong under...

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Neutral

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 2

Login: Anonymous

Email: n/a

Responded At: Apr 10, 2024 06:30:16 am

Last Seen: Apr 10, 2024 06:30:16 am

IP Address: n/a

Q1. First name	Natasha
Q2. Surname	Cusiel
Q3. Organisation (if any)	not answered
Q4. Contact email	mail@saltfinestudio.com
Q5. Location	Jacks Point/Hanleys Farm (Queenstown-Whakatipu ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	Neutral
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	Oppose
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	
<p>With so many waterways in our region, I think the Council should be aiming to reduce the cost of swimming lessons to encourage more people, especially children, to learn to swim in a safe environment such as the pool. I would be more than happy to have my rates used for water safety such as making sure everyone can swim confidently than on Council discretionary spending that does not impact on people's safety. With the cost of living crisis, this is probably one of the first items that parents will drop from their budget, to the detriment of their children's wellbeing and as a community, we should be encouraging our resident's safety</p>	
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	Neutral
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	Neutral

Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees

not answered

Q16. What is your position on proposed changes to Parks and Reserve fees? Neutral

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Oppose

Q19. Please use this space to provide any further comments on proposed changes to Library fees

The library hold fee of \$1 per item should be removed, as staff are basically collecting books from the shelves and putting them into the hold area during their normal salaried hours. We should be encouraging reading, not making it more expensive.

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Neutral

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

This is a huge increase for those with jetties. I don't have one personally but can't see what additional costs are incurred by the Council in relation to these, and jetties are used by more than just the owners

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Neutral

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

Instead of increasing income, why not try reducing costs instead? Get back to basics and work on getting rates down

Q29. **If you have a pre-prepared submission you can upload it here** not answered

Q30. **I understand that my submission is considered public information** I understand



Respondent No: 8
Login: Admin

Responded At: May 02, 2024 06:46:18 am
Last Seen: May 06, 2024 01:09:22 am

Q1. First name	Tim
Q2. Surname	Cuthbertson
Q3. Organisation (if any)	not answered
Q4. Contact email	tim@lakecruise.co.nz
Q5. Location	Wānaka (Wānaka-Upper Clutha ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

Supporting Document Attached

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/f69726f765d0a2222dd21edef5bb2aa280a6734d/original/1714596375/7531ce280c6767e8d09a8884ddf3c659_Submission_moorings_permit_fee_increase_Tim_.pdf?1714596375

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to mooring user fees and charges contained in
QLDC Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Tim Cuthbertson

Submitter e-mail: tim@lakecruise.co.nz

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do not wish to appear and speak in support of my submission at the hearing.

a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw



Respondent No: 6
Login: Admin

Responded At: Apr 24, 2024 06:47:23 am
Last Seen: Apr 23, 2024 20:43:59 pm

Q1. First name	Stevee
Q2. Surname	Devonda
Q3. Organisation (if any)	Iron and Ivy Hair
Q4. Contact email	ironandivyhair@gmail.com
Q5. Location	Central Queenstown (Queenstown-Whakatipu ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

To whom it may concern, I vehemently oppose a \$53 increase in Hairdressers (New and Renewal) Limitation 3 hours for an annual inspection that lasts 15 minutes once a year. In addition, why are hairdressers punished with an annual \$390 fee while Offensive Trades are only \$300? Surely you would increase that line of business by a higher percentage instead of punishing hairdressing salons which offer a valuable service to the community.

Q29. If you have a pre-prepared submission you can upload it here

not answered

Q30. I understand that my submission is considered public information

I understand



Respondent No: 26
Login: Admin

Responded At: May 06, 2024 10:45:23 am
Last Seen: May 06, 2024 01:09:22 am

- Q1. First name Geoff
- Q2. Surname Dickey
-
- Q3. Organisation (if any) not answered
-
- Q4. Contact email [REDACTED]
- Q5. Location Other (please specify)
Unknown
- Q6. Do you wish to speak at a hearing in support of your submission? Yes
- Q7. If yes, please provide a contact phone number TBC
- Q8. What is your position on proposed changes to Environmental Health fees? not answered
- Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees
not answered
- Q10. What is your position on proposed changes to Aquatics fees? not answered
- Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees
not answered
- Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees? not answered
- Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?
not answered
- Q14. What is your position on proposed changes to Community Facility fees? not answered
- Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees
not answered
- Q16. What is your position on proposed changes to Parks and Reserve fees? not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/ac84cb981e66bb3fb2beeb55b0ad7f96069e7a48/original/1714956302/03d3f45e1a89bb91bff5a380fb809f0c_Wayne_Shaw_Submission_Template__Mooring_permit_fee_increase.pdf?1714956302

Q30. I understand that my submission is considered public information

I understand

Friday, 3 May 2024

Submission to proposed changes to user fees and charges contained in QLDC Statement of Proposal dated 5 April 2024 To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Geoff Dickey

Submitter e-mail: [REDACTED]

Subject matter of submission: mooring fees & costs

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission: Statement of proposal and rationale for the increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being \$73,913.

Stated reasons given for the increase include the following:

Fees have not been reviewed since 2011 and administration costs have increased over time.

2

3/ Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.

The reasons do not justify the increase

The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.

The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the entire mooring system. This involves checking the chain and mooring blocks. QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.

Costs associated with investigating unconsented and/or

4/ illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.

Details of mooring location and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates of mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.

The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings in a manner that complies with any and all resource consent conditions. This includes the inspection of the moorings. The Council does not need to inspect the moorings. It simply needs to be provided with details of the mooring inspection that has been arranged by the mooring owner. Use of moorings is at the risk of permit holders.

5/ The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.

I seek the following outcome:

It is reasonable for there to some adjustment to the fee to account for inflation given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of \$350 should be maintained for the coming year.

I believe swing moorings should not be in the same category as jetties and structures. No human can stand or walk on a swing mooring, which means its not a danger to any person.

The mooring fees should not be used for other regulatory expenses.

The council permit system already has rules in place to keep moorings in good condition.

Therefore, we just need to make having a mooring a “permitted activity” in defined areas. This should actually make admin and checking of moorings compliance relatively straight forward.

6/ Once these mooring areas are full, there full , like any other vehicle parking area. Mooring owners seldom use ramps and jetties, and actually lighten the load on these other council owned facilities.

Any further proposal to increase fees should be after a comprehensive and competent review of costs to monitor swing moorings only. These findings should be made available to mooring owners.

My self or my agent wish to appear and speak in support of my submission at the hearing.

Regards Geoff Dickey
3/05/2024



Respondent No: 7
Login: Anonymous

Responded At: May 01, 2024 19:17:33 pm
Last Seen: May 01, 2024 19:17:33 pm

Q1. First name	Michael
Q2. Surname	Donald
Q3. Organisation (if any)	not answered
Q4. Contact email	[REDACTED]
Q5. Location	Hāwea (Wānaka-Upper Clutha ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	Neutral
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	Neutral
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	Neutral
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	Neutral
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	Neutral

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Neutral

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

Most fee increases that are proposed are in line with inflation rates, however the mooring and jetty fees is a huge increase; over double. What is the council actually providing with such a substantial increase?

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Neutral

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 32
Login: Admin

Responded At: May 06, 2024 12:37:33 pm
Last Seen: May 06, 2024 01:09:22 am

- Q1. **First name** Annette
- Q2. **Surname** Fea
- Q3. **Organisation (if any)** not answered
- Q4. **Contact email** [REDACTED]
- Q5. **Location** Wānaka (Wānaka-Upper Clutha ward)
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
- Q7. **If yes, please provide a contact phone number** not answered
- Q8. **What is your position on proposed changes to Environmental Health fees?** not answered
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
- Q10. **What is your position on proposed changes to Aquatics fees?** not answered
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** not answered
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** not answered
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/3622d9a5c1e986a3bf7fcaa4a1cfd80cce3d574a/original/1714963047/5acc53363b6524f07232702540cacd9d_Annette_Fea_-_QLDC__Submission__Mooring_permit_fee_increase.docx?1714963047

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Annette Fea

Submitter e-mail: [REDACTED]

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do/do not (delete one) wish to appear and speak in support of my submission at the hearing.

a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw



Respondent No: 23
Login: Anonymous

Responded At: May 05, 2024 19:25:29 pm
Last Seen: May 05, 2024 19:25:29 pm

- Q1. **First name** Shaun
- Q2. **Surname** Gilbertson
- Q3. **Organisation (if any)** not answered
- Q4. **Contact email** [REDACTED]
- Q5. **Location** Wānaka (Wānaka-Upper Clutha ward)
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
- Q7. **If yes, please provide a contact phone number** not answered
- Q8. **What is your position on proposed changes to Environmental Health fees?** not answered
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
- Q10. **What is your position on proposed changes to Aquatics fees?** not answered
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** not answered
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** not answered
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Oppose

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

I don't mind an increase in landing fees. However we presently landing on one of the roughest grass runways in NZ for public use. I have been part of a group to help rectify this but nothing has been done. I also think it is entirely appropriate we could have a multiple landing fee for local private aircraft. And nearly had this organised with Mr DeBono before he left. It would not be hard to put a formula together to achieve this. The cost of new position as safely officer is not justified, and at most is a part time job that should be accommodated within the current staff structure.

Q26. What is your position on proposed changes to Planning and Development fees? not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 22
Login: Anonymous

Responded At: May 05, 2024 12:13:29 pm
Last Seen: May 05, 2024 12:13:29 pm

- Q1. **First name** Don
- Q2. **Surname** Grant
- Q3. **Organisation (if any)** Wanaka Airport Users Group
- Q4. **Contact email** [REDACTED]
- Q5. **Location** Wānaka (Wānaka-Upper Clutha ward)
- Q6. **Do you wish to speak at a hearing in support of your submission?** Yes
- Q7. **If yes, please provide a contact phone number** [REDACTED]
- Q8. **What is your position on proposed changes to Environmental Health fees?** not answered
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
- Q10. **What is your position on proposed changes to Aquatics fees?** not answered
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** not answered
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** not answered
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

Our group, the Wanaka Airport Users Group is made up of over 80 aviation businesses and individuals who all land and take off at Wanaka Airport. While we realise that fees haven't been increased for over 10 years and that the increase is moderate we would like to submit that the management of the airport is costing the council and ratepayer far too much money and can be done far more economically. There are three Airport Managers plus ground staff and a fee of \$300,000 to manage the airport. While air traffic has increased recently, this doesn't in itself mean that you need more managers. Pilots coming to and from Wanaka all manage their own flights, landings and take-offs with no input from airport staff. We believe the airport could be managed by one part-time manager dealing with safety issues and the ground staff that you have at present, doing runway inspections and maintenance. Putting up landing fees and ground rentals without looking at the over-management of the airport will push people away from the airport. Already many businesses who want to expand can't due to a lack of long term leases leaving business owners wondering if the council doesn't want General Aviation at Wanaka. A recent request from airport management of \$75,000 to build a shed for the airport utility and lawn-mowing equipment is a real smack in the face for the users, when we have for many years been trying to get the grass runway fixed. The runway (which many aviators use with their older tail wheel planes) is now a big safety issue and needs urgent repair. We offered airport management to survey by drone the amount of soil needed to to fix the runway for a cost of \$2,000 in 2022. We are still waiting to hear back from the management. Many offers from users to help at the airport and save money have been turned down. Just last week I offered to get a group of volunteers to help fix a big hole at the end of the seal of Taxiway Yankee, as we've been waiting over 6 years for this to be fixed, another safety issue. We were again turned down, health and safety being cited as the reason. Yet I personally managed 300 plus volunteers over 5 days at the airport during Warbirds Over Wanaka 2024, we had 65,000 members of the public pass through the airport and we had no health and safety issues. And I can't get airport management to allow 6 pilots to help fill and seed some soil to help with a safety issue. Rather than just increase fees for the users I would like to request that we look at the costly over management of the airport and allow the users to help out more. After all, they did for the first 40 years in establishing and running the airport up until 2017.

Q26. **What is your position on proposed changes to Planning and Development fees?** not answered

Q27. **Please use this space to provide any further comments on proposed changes to Planning and Development fees**
not answered

Q28. **Do you have any other feedback relating to Council fees and charges?**
not answered

Q29. **If you have a pre-prepared submission you can upload it here** not answered

Q30. **I understand that my submission is considered public information** I understand



Respondent No: 29
Login: Admin

Responded At: May 06, 2024 11:03:12 am
Last Seen: May 06, 2024 01:09:22 am

Q1. First name	Mike
Q2. Surname	Hall
Q3. Organisation (if any)	not answered
Q4. Contact email	mike@capitalgroupnz.co.nz
Q5. Location	Central Queenstown (Queenstown-Whakatipu ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/5fe7b3518419dd249524ca7e2122fd9a8809e217/original/1714957388/f18954e847bdac11bc370bd09b0d2fa3_Mike_Hall_Submission_-_Mooring_permit_fee_increase.pdf?1714957388


Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name:

Michael Hall


Queenstown

Submitter e-mail:

mike@capitalgroupnz.co.nz

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.
2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do not wish to appear and speak in support of my submission at the hearing.

Regards



Mike Hall

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw



Respondent No: 6
Login: Admin

Responded At: May 02, 2024 06:35:41 am
Last Seen: May 06, 2024 01:09:22 am

Q1. First name	Julian
Q2. Surname	Haworth
Q3. Organisation (if any)	not answered
Q4. Contact email	[REDACTED]
Q5. Location	Wānaka (Wānaka-Upper Clutha ward)
Q6. Do you wish to speak at a hearing in support of your submission?	Yes
Q7. If yes, please provide a contact phone number	[REDACTED]
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

Supporting document attached

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/5395ec64885a80cca9323852aa06684fd03f17aa/original/1714595735/5e8566698879e2a7c5ec8021c0342550_Mooring_fee_increase_submission_Juliandocx.docx?1714595735

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Julian Haworth



Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some \$73,913.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is **therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.**⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates of mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

²See QLDC Swing Moorings Booklet, August 2022

³This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴Note: QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵Refer QLDC Swing Moorings Booklet, August 2022

⁶Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. **The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic.** It is the responsibility of mooring owners to maintain their moorings in a manner that complies with any and all resource consent conditions. **This includes the inspection of the moorings.** The Council does not need to inspect the moorings. It simply needs to be provided with details of the mooring inspection that has been arranged by the mooring owner. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should be after a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do wish to appear and speak in support of my submission at the hearing, but only if this hearing is held in Wanaka.

Julian Haworth

30th April 2024

a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷Clause 47.4 of the Bylaw



Respondent No: 17
Login: Anonymous

Responded At: May 03, 2024 18:19:08 pm
Last Seen: May 03, 2024 18:19:08 pm

- Q1. First name Steven
- Q2. Surname Hodgson
- Q3. Organisation (if any) not answered
- Q4. Contact email [REDACTED]
- Q5. Location Kelvin Peninsula (Queenstown-Whakatipu ward)
- Q6. Do you wish to speak at a hearing in support of your submission? No
- Q7. If yes, please provide a contact phone number not answered
- Q8. What is your position on proposed changes to Environmental Health fees? Neutral
- Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees
not answered
- Q10. What is your position on proposed changes to Aquatics fees? Neutral
- Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees
not answered
- Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees? Oppose
- Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?
not answered
- Q14. What is your position on proposed changes to Community Facility fees? Oppose
- Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees
not answered
- Q16. What is your position on proposed changes to Parks and Reserve fees? Oppose

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Support

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

The cost increases are not commensurate with the work of administering the private jetty infrastructure. No financial information has been provided to support a 100% increase, given that jetties are require to be consented and maintained at the owners cost. A fee increased in line with the cost of living is supported.

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Support

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

Lack of transparency throughout the process and completely inadequate financial information supplied as part of the fee increase justification.

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Steven Hodgson

Submitter e-mail: [REDACTED]

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.
2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶
7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw

9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- ☐ It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- ☐ Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do not (delete one) wish to appear and speak in support of my submission at the hearing.

 3.5.2024



Respondent No: 33
Login: Admin

Responded At: May 06, 2024 12:41:35 pm
Last Seen: May 06, 2024 01:09:22 am

- Q1. **First name** Darelle
-
- Q2. **Surname** Jenkins
-
- Q3. **Organisation (if any)** Central Otago branch of Hospitality New Zealand
-
- Q4. **Contact email** darelle@hospitality.org.nz
-
- Q5. **Location** **Other (please specify)**
Wellington
-
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
-
- Q7. **If yes, please provide a contact phone number** not answered
-
- Q8. **What is your position on proposed changes to Environmental Health fees?** not answered
-
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
-
- Q10. **What is your position on proposed changes to Aquatics fees?** not answered
-
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
-
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** not answered
-
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
-
- Q14. **What is your position on proposed changes to Community Facility fees?** not answered
-
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
-
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** not answered
-

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/8d4f1208f4db501df49cbb7e1bd0761e03916464/original/1714963289/babcab7e5fd490185268191285832230_HNZ_Central_Otago_Submission-QLDC_User_Fees_and_Charges_Submission_.docx.pdf?1714963289

Q30. I understand that my submission is considered public information I understand



03 May 2024

User Fees and Charges 2024-2025
Queenstown Lakes District Council

Via email: letstalk@qldc.govt.nz

RE: User Fees and Charges 2024-2025

Tenā koe,

Hospitality New Zealand (“Hospitality NZ”) is a not-for-profit organisation representing approximately 2,500 businesses, including cafés, restaurants, bars, nightclubs, commercial accommodation, country hotels and off-licences. We champion hospitality, serving our members and communities, and seek to see hospitality recognised and celebrated for its contribution to Aotearoa, attracting fresh talent and generating sustainable returns for businesses and communities. We have a 122-year history of advocating on behalf of the hospitality and tourism sector.

We are writing to you on the proposed User Fees and Charges 2024-2025 increase on Environmental Health.

We recognise that Council is facing cost pressures – this is true for every organisation across the motu. However, an increase of 16% is not an insignificant increase for our Hospitality operators to take on when there are a lot of other cost increases occurring, meaning these businesses are facing an increasingly challenging operating environment already.

Please do not hesitate to contact us if you have any further questions.

Ngā mihi nui,

Darelle Jenkins
Senior Regional Manager
Hospitality New Zealand





Respondent No: 9
Login: Anonymous

Responded At: May 02, 2024 09:29:01 am
Last Seen: May 02, 2024 09:29:01 am

- Q1. **First name** Nikki
- Q2. **Surname** Jones
- Q3. **Organisation (if any)** Nikki's Celebration Cakes
- Q4. **Contact email** nikkiscakes.qt@gmail.com
- Q5. **Location** Jacks Point/Hanleys Farm (Queenstown-Whakatipu ward)
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
- Q7. **If yes, please provide a contact phone number** not answered
- Q8. **What is your position on proposed changes to Environmental Health fees?** Oppose
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
- I am a small home based business making cakes part time for clients less than 1 per week. My costs to comply are the same as large scale businesses. When I applied to make a second kitchen to make cakes safely in my home I was required to state I would remain small scale. I would like less fees and happy to continue with my 18 monthly audits, they usually take less than an hour.
- Q10. **What is your position on proposed changes to Aquatics fees?** Neutral
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
- not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** Neutral
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
- not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** Neutral
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
- not answered

Q16. What is your position on proposed changes to Parks and Reserve fees? Neutral

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Oppose

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Neutral

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Neutral

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 30
Login: Admin

Responded At: May 06, 2024 11:05:20 am
Last Seen: May 06, 2024 01:09:22 am

Q1. First name	Anthony
Q2. Surname	King
Q3. Organisation (if any)	Pak n Save
Q4. Contact email	Anthony.King@paknsave-si.co.nz
Q5. Location	Other (please specify) Unknown
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here https://s3.ap-southeast-2.amazonaws.com/ehq-production-australia/9b84b4a9b3f0380fcf47e89f6528997bfd597515/original/1714957515/5c9c75f291f3e77430c8ec1b770d446b_Anthony_King_Submission_Template_Mooring_permit_fee_increase.docx?1714957515

Q30. I understand that my submission is considered public information I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Anthony King

Submitter e-mail: Anthony.king@paknsave-si.co.nz

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings. I submit AGAINST the proposal for increased fees

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do not wish to appear and speak in support of my submission at the hearing.

a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw



Respondent No: 4
Login: Admin

Responded At: May 02, 2024 06:11:16 am
Last Seen: May 06, 2024 01:09:22 am

Q1. First name	Elaine
Q2. Surname	Lawrence
Q3. Organisation (if any)	not answered
Q4. Contact email	[REDACTED]
Q5. Location	Central Queenstown (Queenstown-Whakatipu ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

Attached supporting document regarding moorings.

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/f46c65d01452b74c61d034f632348f085e32b410/original/1714594268/2debdd3d6e211f62a1f244d19625962a_Submission_-_Mooring_permit_fee_increase.docx?1714594268

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Elaine Lawrence



Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do not wish to appear and speak in support of my submission at the hearing.

a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw



Respondent No: 31
Login: Admin

Responded At: May 06, 2024 11:07:00 am
Last Seen: May 06, 2024 01:09:22 am

- Q1. **First name** Peter
- Q2. **Surname** Lawson
- Q3. **Organisation (if any)** not answered
- Q4. **Contact email** [REDACTED]
- Q5. **Location** Other (please specify)
Unknown
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
- Q7. **If yes, please provide a contact phone number** not answered
- Q8. **What is your position on proposed changes to Environmental Health fees?** not answered
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
- Q10. **What is your position on proposed changes to Aquatics fees?** not answered
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** not answered
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** not answered
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/11f056a1027e55438bfcf350a262e44199f28b0e/original/1714957610/575fc4bd29d753c0d175fb05df257476_Peter_Lawson_Submission_Template_Mooring_permit.pdf?1714957610

Q30. I understand that my submission is considered public information I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name:

[REDACTED]

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.
2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶
7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw

9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do/do not (delete one) wish to appear and speak in support of my submission at the hearing.



Respondent No: 7
Login: Anonymous

Responded At: Apr 25, 2024 09:13:13 am
Last Seen: Apr 25, 2024 09:13:13 am

Q1. First name	Matt
Q2. Surname	Lewis
Q3. Organisation (if any)	not answered
Q4. Contact email	[REDACTED]
Q5. Location	Wānaka (Wānaka-Upper Clutha ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	Oppose
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	Neutral
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	Neutral
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	Support
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	Support

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Neutral

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Neutral

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Oppose

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

Stop charging a resource consent fee to someone who is building a house in a subdivision that has already been resourced for housing.

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 11
Login: Admin

Responded At: May 03, 2024 07:41:57 am
Last Seen: May 06, 2024 01:09:22 am

Q1. First name	Rod and Jayne
Q2. Surname	Macdonald
Q3. Organisation (if any)	not answered
Q4. Contact email	[REDACTED]
Q5. Location	Wānaka (Wānaka-Upper Clutha ward)
Q6. Do you wish to speak at a hearing in support of your submission?	Yes
Q7. If yes, please provide a contact phone number	[REDACTED]
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

Supporting document attached

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/717df8209d8a7ae2507b2d24331a4bd8695ee3b3/original/1714686113/8fe0de2f61a8d696abd6b755bfb8913d_JEM-326142-11-720-1_%28Submission_Template_-_Mooring_permit_fee_increase%29.pdf?1714686113

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Rod and Jayne Macdonald

██████████ ████████████████████

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

Concluding comments

We have owned our mooring for over 20 years. We have complied with the terms and conditions of our permit. We have never had any issues with our mooring block, or its components. It is in our interests that the mooring is properly maintained and can thus provide a safe and secure anchor for our vessel while on the water. We are concerned that the Council are trying to identify problems and issues, where none exist, to justify the fee increase. The old adage comes to mind, **if it ain't broken....**

We seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

We do wish to appear and speak in support of our submission at the hearing.

a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw



Respondent No: 2
Login: Anonymous

Responded At: Apr 18, 2024 15:36:51 pm
Last Seen: Apr 18, 2024 15:36:51 pm

- Q1. **First name** Derek
- Q2. **Surname** Melnick
- Q3. **Organisation (if any)** not answered
- Q4. **Contact email** [REDACTED]
- Q5. **Location** Jacks Point/Hanleys Farm (Queenstown-Whakatipu ward)
- Q6. **Do you wish to speak at a hearing in support of your submission?** Yes
- Q7. **If yes, please provide a contact phone number** [REDACTED]
- Q8. **What is your position on proposed changes to Environmental Health fees?** not answered
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
- Q10. **What is your position on proposed changes to Aquatics fees?** not answered
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** not answered
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**

The lap pool is often hugely disproportionately closed off to the public while the bulk of lanes sold/booked by user groups. We are often told there are always 2 lanes for the public but this is not the case. You simply cannot swim in the last lane - it's for aqua joggers, the injured doing rehab or very slow moving paddlers. I propose that more public lane space is made available. Likewise - the pool has very unsanitary conditions, with tufts of hair often floating in it, on multiple occasions I've swum into it in my face. Cleaning regimes don't seem to permanently remedy this one, I propose a simple measure of compulsory caps.
- Q14. **What is your position on proposed changes to Community Facility fees?** not answered
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered

Q16. **What is your position on proposed changes to Parks and Reserve fees?** not answered

Q17. **Please use this space to provide any further comments on proposed changes to Parks and Reserve fees**
not answered

Q18. **What is your position on proposed changes to Library fees?** not answered

Q19. **Please use this space to provide any further comments on proposed changes to Library fees**
not answered

Q20. **What is your position on proposed changes to Parking fees in the Queenstown Town Centre?** not answered

Q21. **Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre**

I, like many local Queenstowners, totally avoid going into the CBD at all costs. With the mass removal of car parks, technology and cameras to punitively punish the message being received from the community is - you are not welcome. I propose a VERY simple remedy - increase the car parking cost significantly and at the same time provide locally registered cars together with a residential proof of qualifier to receive a parking disc allowing Queenstown residents to park for a number of hours free, depending on location. Start to reward those that live here instead of only punitive measures with regard to parking and you'll be rewarded for investing in the community that fund QLDC.

Q22. **What is your position on proposed changes to Mooring fees?** not answered

Q23. **Please use this space to provide any further comments on proposed changes to Mooring fees**
not answered

Q24. **What is your position on proposed changes to Wānaka Airport Landing Fees?** not answered

Q25. **Please use this space to provide any further comments on proposed changes to Wānaka Airport fees**
not answered

Q26. **What is your position on proposed changes to Planning and Development fees?** not answered

Q27. **Please use this space to provide any further comments on proposed changes to Planning and Development fees**
not answered

Q28. **Do you have any other feedback relating to Council fees and charges?**
not answered

Q29. **If you have a pre-prepared submission you can upload it here** not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 1

Login: Anonymous

Email: n/a

Responded At: Apr 06, 2024 14:47:33 pm

Last Seen: Apr 06, 2024 14:47:33 pm

IP Address: n/a

- Q1. **First name** Allan
- Q2. **Surname** mitchell
- Q3. **Organisation (if any)** not answered
- Q4. **Contact email** [REDACTED]
- Q5. **Location** Central Queenstown (Queenstown-Whakatipu ward)
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
- Q7. **If yes, please provide a contact phone number** not answered
- Q8. **What is your position on proposed changes to Environmental Health fees?** Neutral
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
- Q10. **What is your position on proposed changes to Aquatics fees?** Neutral
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** Neutral
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** Neutral
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** Neutral

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Oppose

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

We should be doing everything we can to support retailers and the hospitality industry and provide more parking and parking concessions as we had during Covid times.

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

My mooring costs would double in one hit, this is excessive with no improvement of service. Having a mooring seems to be subsidising all other casual lake users. If an increase is deemed necessary then it should be done in incremental steps over a number of years, not just doubling in one rating period. These costs of any of council proposals seems the most excessive and spread over a small user base.

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Support

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Neutral

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 18
Login: Anonymous

Responded At: May 04, 2024 07:28:35 am
Last Seen: May 04, 2024 07:28:35 am

- Q1. **First name** Jules
- Q2. **Surname** Mumford
- Q3. **Organisation (if any)** not answered
- Q4. **Contact email** [REDACTED]
- Q5. **Location** Wānaka (Wānaka-Upper Clutha ward)
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
- Q7. **If yes, please provide a contact phone number** not answered
- Q8. **What is your position on proposed changes to Environmental Health fees?** Support
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
- Q10. **What is your position on proposed changes to Aquatics fees?** Neutral
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** Neutral
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** Support
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** Support

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Oppose

Q19. Please use this space to provide any further comments on proposed changes to Library fees

At present Wanaka library is providing free wi-fi, electric charging power and documentation/visa assistance to backpackers/tourists, who do not pay rates. This needs to be chargeable (at reasonable rates) or be dramatically reduced. I do not agree overdue fees should be removed (apart from children), this discourages people from returning books on time. I also suggest a VIP/Patron option where maybe you pay \$10/20 per year and you do not get charged "hold" fees, other borrowing/hold limits would still apply. The library is one of the most important functions/services in the local community, it needs to be protected at all costs.

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Neutral

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Neutral

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Support

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Support

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 5
Login: Anonymous

Responded At: Apr 23, 2024 22:30:28 pm
Last Seen: Apr 23, 2024 22:30:28 pm

- Q1. First name Joyce
- Q2. Surname Nagai
- Q3. Organisation (if any) not answered
- Q4. Contact email [REDACTED]
- Q5. Location Shotover Country / Lake Hayes Estate (Arrowtown-Kawarau ward)
- Q6. Do you wish to speak at a hearing in support of your submission? No
- Q7. If yes, please provide a contact phone number not answered
- Q8. What is your position on proposed changes to Environmental Health fees? Oppose
- Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees
The increase in fees will make it very hard for small business like me to survive. I am a home based business and only work part time. The fees are unbearable.
- Q10. What is your position on proposed changes to Aquatics fees? Oppose
- Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees
not answered
- Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees? Oppose
- Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?
not answered
- Q14. What is your position on proposed changes to Community Facility fees? Oppose
- Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees
not answered
- Q16. What is your position on proposed changes to Parks and Reserve fees? Oppose

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Oppose

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Oppose

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

High parking fees is just ridiculous!! People will be avoiding going to town even more. Please do something about this so that families and locals can again enjoy going to town without having to worry about adding the parking fees to our family weekend budget!

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Oppose

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Oppose

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 28
Login: Admin

Responded At: May 06, 2024 10:53:26 am
Last Seen: May 06, 2024 01:09:22 am

- Q1. **First name** Gregory
- Q2. **Surname** Noye
- Q3. **Organisation (if any)** not answered
- Q4. **Contact email** [REDACTED]
- Q5. **Location** Wānaka (Wānaka-Upper Clutha ward)
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
- Q7. **If yes, please provide a contact phone number** not answered
- Q8. **What is your position on proposed changes to Environmental Health fees?** not answered
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
- Q10. **What is your position on proposed changes to Aquatics fees?** not answered
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** not answered
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** not answered
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/bcf82a65d91cefa7b719fa7901b9cec019968330/original/1714956794/ca28c0f30ef96d11a8a4677137495bef_Gregory_Noye_Submission__Goup_Mooring.docx?1714956794

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Gregory Noye



Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.
2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹

¹The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

²See QLDC Swing Moorings Booklet, August 2022

³This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵Refer QLDC Swing Moorings Booklet, August 2022

⁶Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do not wish to appear and speak in support of my submission at the hearing.

⁷Clause 47.4 of the Bylaw



Respondent No: 6
Login: Anonymous

Responded At: May 01, 2024 16:13:44 pm
Last Seen: May 01, 2024 16:13:44 pm

Q1. First name	Andy
Q2. Surname	Oxley
Q3. Organisation (if any)	not answered
Q4. Contact email	[REDACTED]
Q5. Location	Wānaka (Wānaka-Upper Clutha ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	Neutral
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	Neutral
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	Neutral
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	Neutral
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	Neutral

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Neutral

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

See file uploaded file.

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Neutral

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/bbc86c928fc0a5829a6f8dd1c6be2cafe6aa4b0a/original/1714543877/199a1700ba3cf3dd9db0d2afb0d6aa63_Oxley_Submission_to_Moorings_Fees___Charges.pdf?1714543877

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Andrea Oxley



Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do not wish to appear and speak in support of my submission at the hearing.

a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw



Respondent No: 20
Login: Anonymous

Responded At: May 04, 2024 14:43:01 pm
Last Seen: May 04, 2024 14:43:01 pm

- Q1. First name Gary
- Q2. Surname Pasco
- Q3. Organisation (if any) not answered
- Q4. Contact email [REDACTED]
- Q5. Location Wānaka (Wānaka-Upper Clutha ward)
- Q6. Do you wish to speak at a hearing in support of your submission? No
- Q7. If yes, please provide a contact phone number not answered
- Q8. What is your position on proposed changes to Environmental Health fees? Neutral
- Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees
not answered
- Q10. What is your position on proposed changes to Aquatics fees? Neutral
- Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees
not answered
- Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees? Neutral
- Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?
not answered
- Q14. What is your position on proposed changes to Community Facility fees? Neutral
- Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees
not answered
- Q16. What is your position on proposed changes to Parks and Reserve fees? Neutral

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Neutral

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

I have owned a mooring in Lake Wanaka for some time. I have been responsible for maintaining my mooring which I understand will continue. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is problematic. It is the responsibility of mooring owners to maintain their moorings. I can't see how such an increase as is proposed can be justified. To me the proposed increase does not reflect user pay charges or actual cost recovery by the Council and it doesn't help that this increase comes on top of proposed rates increases for our area. I think it is reasonable for there to be some adjustment of the fee to reflect increasing costs like inflation however the proposed increase is too much. The current fee structure (adjusted for inflation) of \$350 should be maintained for the coming year.

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Neutral

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 3
Login: Anonymous

Responded At: Apr 29, 2024 12:45:38 pm
Last Seen: Apr 29, 2024 12:45:38 pm

Q1. First name	Aimee
Q2. Surname	Prendergast
Q3. Organisation (if any)	Willow Cakes
Q4. Contact email	weepingwillowcakes@gmail.com
Q5. Location	Arrowtown (Arrowtown-Kawarau ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	Oppose
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	<p>The fees for small businesses are getting out of control. It's almost as if the council doesn't want new business to survive. They spend less than a hour as my premises and charge me for 6.</p>
Q10. What is your position on proposed changes to Aquatics fees?	Neutral
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	Neutral
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	Neutral
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	Neutral

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Oppose

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Neutral

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Neutral

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 14

Login: Admin

Responded At: May 03, 2024 08:01:24 am

Last Seen: May 06, 2024 01:09:22 am

- Q1. **First name** Clark
- Q2. **Surname** Scott
- Q3. **Organisation (if any)** not answered
- Q4. **Contact email** [REDACTED]
- Q5. **Location** Central Queenstown (Queenstown-Whakatipu ward)
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
- Q7. **If yes, please provide a contact phone number** not answered
- Q8. **What is your position on proposed changes to Environmental Health fees?** not answered
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
- Q10. **What is your position on proposed changes to Aquatics fees?** not answered
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** not answered
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** not answered
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

Supporting document attached

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/54a59e408c5879b908c772444b10c2905f3100de/original/1714687281/019f5cf92b43638ca2e0a6dc1ec7bc1f_Submission_Mooring_permit_fee_increase.docx?1714687281

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name:

Clark Scott

[REDACTED]

[REDACTED]

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do not wish to appear and speak in support of my submission at the hearing.

a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw



Respondent No: 5
Login: Admin

Responded At: May 02, 2024 06:21:03 am
Last Seen: May 06, 2024 01:09:22 am

Q1. First name	Peri and Mark
Q2. Surname	Scrivenor
Q3. Organisation (if any)	not answered
Q4. Contact email	[REDACTED]
Q5. Location	Central Queenstown (Queenstown-Whakatipu ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

Attached supporting document regarding mooring fees

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/ae238faa4de1779aeea178c719722037ffe1264/original/1714594856/66ab1c00dacb8f98a46f193c806ab67b_P_and_M_Scrive_nor_Mooring_Fees_Submission_full_doc.pdf?1714594856

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges
contained in QLDC Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Mark and Peri Scrivenor

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.
2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information

provided with the statement of proposal at all to support to fee increase.¹

3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources - i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC **does not** monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I ~~do~~/do not (delete one) wish to appear and speak in support of my submission at the hearing.


Peri Craven

Mark Craven

⁷ Clause 47.4 of the Bylaw



Respondent No: 15
Login: Admin

Responded At: May 03, 2024 08:18:33 am
Last Seen: May 06, 2024 01:09:22 am

- Q1. **First name** Marshall
- Q2. **Surname** Scrivenors
-
- Q3. **Organisation (if any)** not answered
-
- Q4. **Contact email** [REDACTED]
- Q5. **Location** Wānaka (Wānaka-Upper Clutha ward)
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
- Q7. **If yes, please provide a contact phone number** not answered
- Q8. **What is your position on proposed changes to Environmental Health fees?** not answered
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
- Q10. **What is your position on proposed changes to Aquatics fees?** not answered
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** not answered
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** not answered
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

Supporting document attached

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/71685cef27993af33832d6705943bee11191f4d8/original/1714688308/308be7abb058ea16574ed44d0ab1439d_Marshall_Scrivenor_Mooring_Fees_Submission_P1.pdf?1714688308

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges
contained in QLDC Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Marshall Scrivenor

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.
2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information

provided with the statement of proposal at all to support to fee increase.¹

3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources - i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do/do not (delete one) wish to appear and speak in support of my submission at the hearing.

A handwritten signature in black ink, appearing to be 'M. G. ...', written over a horizontal line.

⁷ Clause 47.4 of the Bylaw



Respondent No: 25
Login: Admin

Responded At: May 06, 2024 10:34:29 am
Last Seen: May 06, 2024 01:09:22 am

- Q1. First name Wayne
- Q2. Surname Shaw
- Q3. Organisation (if any) Shaw Financial Insurance and Investments Limited
- Q4. Contact email wayne@shawfinancial.co.nz
- Q5. Location Frankton (Queenstown-Whakatipu ward)
- Q6. Do you wish to speak at a hearing in support of your submission? Yes
- Q7. If yes, please provide a contact phone number [REDACTED]
- Q8. What is your position on proposed changes to Environmental Health fees? not answered
- Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees
not answered
- Q10. What is your position on proposed changes to Aquatics fees? not answered
- Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees
not answered
- Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees? not answered
- Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?
not answered
- Q14. What is your position on proposed changes to Community Facility fees? not answered
- Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees
not answered
- Q16. What is your position on proposed changes to Parks and Reserve fees? not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/ac84cb981e66bb3fb2beeb55b0ad7f96069e7a48/original/1714955661/1464ee9c3a542d6118efb1158951419b_Wayne_Shaw_Submission_Template__Mooring_permit_fee_increase.pdf?1714955661

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: wayne shaw

Submitter e-mail: wayne@shawfinancial.co.nz

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do wish to appear and speak in support of my submission at the hearing.

a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw



Respondent No: 1
Login: Anonymous

Responded At: Apr 12, 2024 10:49:45 am
Last Seen: Apr 12, 2024 10:49:45 am

- Q1. First name Chris
- Q2. Surname Street
- Q3. Organisation (if any) self
- Q4. Contact email [REDACTED]
- Q5. Location Arthurs Point (Arrowtown-Kawarau ward)
- Q6. Do you wish to speak at a hearing in support of your submission? Yes
- Q7. If yes, please provide a contact phone number [REDACTED]
- Q8. What is your position on proposed changes to Environmental Health fees? Support
- Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees
- I would be happy to pay double the current RMA fees if I could get served twice as fast. I urge QLDC to do what Invercargill City did a few years ago - make a study into the financial impacts of slow building and subdivision consents on your building and subdividing clients. Higher fees for better service could then be justified.
- Q10. What is your position on proposed changes to Aquatics fees? Neutral
- Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees
- not answered
- Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees? Neutral
- Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?
- not answered
- Q14. What is your position on proposed changes to Community Facility fees? Neutral
- Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees
- not answered
- Q16. What is your position on proposed changes to Parks and Reserve fees? Neutral

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Neutral

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Neutral

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Support

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

I would be happy to pay double the current RMA fees if I could get served twice as fast. I urge QLDC to do what Invercargill City did a few years ago - make a study into the financial impacts of slow building and subdivision consents on your building and subdividing clients. Higher fees for better service could then be justified. Pay your staff better instead of using contractors

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 1
Login: Anonymous

Responded At: Apr 18, 2024 12:48:21 pm
Last Seen: Apr 18, 2024 12:48:21 pm

Q1. First name	Danna
Q2. Surname	Thomas
Q3. Organisation (if any)	not answered
Q4. Contact email	[REDACTED]
Q5. Location	Frankton (Queenstown-Whakatipu ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	Neutral
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	Oppose
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	Oppose
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	Neutral
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	Neutral

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Oppose

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Oppose

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

For locals, should keep \$4/hr when using app.

Q22. What is your position on proposed changes to Mooring fees? Neutral

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Neutral

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 13
Login: Admin

Responded At: May 03, 2024 07:52:33 am
Last Seen: May 06, 2024 01:09:22 am

Q1. First name	Richard
Q2. Surname	Thomas
Q3. Organisation (if any)	not answered
Q4. Contact email	richard@redwulff.co.nz
Q5. Location	Wānaka (Wānaka-Upper Clutha ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

Supporting document attached

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/d6ae9b9e50550877dc80d649f0628ff910b5036c/original/1714686750/499a48615e59b3b3700544f73b35841a_Mooring_Submission.docx?1714686750

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Richard Thomas

Submitter e-mail: richard@redwulff.co.nz

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do not wish to appear and speak in support of my submission at the hearing.

a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw



Respondent No: 24
Login: Admin

Responded At: May 06, 2024 10:31:14 am
Last Seen: May 06, 2024 01:09:22 am

- Q1. **First name** Maria & Matthew
- Q2. **Surname** Thomson
- Q3. **Organisation (if any)** not answered
- Q4. **Contact email** [REDACTED]
- Q5. **Location** Other (please specify)
Unknown
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
- Q7. **If yes, please provide a contact phone number** not answered
- Q8. **What is your position on proposed changes to Environmental Health fees?** not answered
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
- Q10. **What is your position on proposed changes to Aquatics fees?** not answered
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** not answered
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** not answered
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

Please see attached with regards to mooring permits fee increase proposal

Q29. If you have a pre-prepared submission you can upload it here https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/02ae348974203829aa9772c1517cdeb97fc69bb6/original/1714955360/83bff7b99db893fc0ffdba90eb905aee_Maria_Thomson_Submission_Template__Mooring_permit_fee_increase.docx?1714955360

Q30. I understand that my submission is considered public information I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Maria & Matthew Thomson



Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
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6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do not wish to appear and speak in support of my submission at the hearing.

a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw



Respondent No: 2
Login: Admin

Responded At: Apr 29, 2024 07:14:06 am
Last Seen: May 02, 2024 21:33:50 pm

Q1. First name	Unknown
Q2. Surname	Unknown
Q3. Organisation (if any)	not answered
Q4. Contact email	[REDACTED]
Q5. Location	Central Queenstown (Queenstown-Whakatipu ward)
Q6. Do you wish to speak at a hearing in support of your submission?	No
Q7. If yes, please provide a contact phone number	not answered
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Oppose

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

Hi I have been living in Queenstown for past 3 years and have been witnessing a lot of fees and charges on certain things like -Parking fees has increased in town since my arrival here in Queenstown. This has been very annoying since we are traddies as well and have been building and renovating Queenstown and can't really park our van anywhere without getting a fine. This should be changed 😊. Maybe company vehicles can get a pass to park around building sites without paying anything, after all we are building, improving Queenstown to make it look more appealing and presenting for our tourists and us locals too. -Fees for an hour to hire a space is ridiculous. I have been hiring spaces for my classes but most of the time they are over \$25 mark range per hour. This should change. Just the other day I wanted to hire a school hall for my class for just an hour I was asked to pay \$40 an hour and pay bond of \$800.00 that was insane. I said No Thank-you. I mean we should be allowed to be paying atleast \$10 per hour to hire a small space like 18sqm. Yes so this is my say hopefully this helps even a little bit. Regards

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 12
Login: Admin

Responded At: May 03, 2024 07:50:29 am
Last Seen: May 06, 2024 01:09:22 am

- Q1. **First name** Mark and Tracy
- Q2. **Surname** Wikstrom
- Q3. **Organisation (if any)** not answered
- Q4. **Contact email** [REDACTED]
- Q5. **Location** Wānaka (Wānaka-Upper Clutha ward)
- Q6. **Do you wish to speak at a hearing in support of your submission?** Yes
- Q7. **If yes, please provide a contact phone number** [REDACTED]
- Q8. **What is your position on proposed changes to Environmental Health fees?** not answered
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
not answered
- Q10. **What is your position on proposed changes to Aquatics fees?** not answered
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** not answered
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** not answered
- Q15. **Please use this space to provide any further comments on proposed changes to Community Facility fees**
not answered
- Q16. **What is your position on proposed changes to Parks and Reserve fees?** not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees?

not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre?

not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees?

not answered

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

Supporting document attached

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees?

not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees?

not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/62c1f5918d387acdf2c8920d86dd972126cf8860/original/1714686623/59a620948c41ef6ebdec0621250cba22_Scan_20240502.pdf?1714686623

Q30. I understand that my submission is considered public information

I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: MARK WIKSTROM

Submitter e-mail: [REDACTED]

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ - The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I ~~do~~ ^{do} not (delete one) wish to appear and speak in support of my submission at the hearing.

⁷ a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁸ Clause 47.4 of the Bylaw

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: TRACY WIKSTROM

Submitter e-mail: [REDACTED]

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
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The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
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4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks⁵
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² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC Inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
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I seek the following outcome:

- It is reasonable for there to be some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I ~~do~~ do not (delete one) wish to appear and speak in support of my submission at the hearing.

a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷ Clause 47.4 of the Bylaw



Respondent No: 4
Login: Anonymous

Responded At: Apr 22, 2024 19:16:48 pm
Last Seen: Apr 22, 2024 19:16:48 pm

- Q1. **First name** Nadine
- Q2. **Surname** Will
- Q3. **Organisation (if any)** the country cakery
- Q4. **Contact email** nadine@thecountrycakery.com
- Q5. **Location** Shotover Country / Lake Hayes Estate (Arrowtown-Kawarau ward)
- Q6. **Do you wish to speak at a hearing in support of your submission?** No
- Q7. **If yes, please provide a contact phone number** not answered
- Q8. **What is your position on proposed changes to Environmental Health fees?** Oppose
- Q9. **Please use this space to provide any further comments on proposed changes to Environmental Health fees**
- I feel the fees for Registered Home Bakers are excessively high already. Having a yearly cost of over \$1000 for registration and verification audits for a small business allot, especially when the time taken (including prep, travel, admin and the audit itself) for registered home bakers is far less then the 6 hours charged. I feel that small businesses being charged the same fees as 300 room hotels in Queenstown is completely unfair and I do feel that these fees now increasing along with all other costs will make small businesses close as they cannot continue to carry this cost. I think a tiered or category approach to food control plan customers needs to be look at where everyone is not considered the same and different fees are charged based on size / scope / employee number etc of the operations
- Q10. **What is your position on proposed changes to Aquatics fees?** Neutral
- Q11. **Please use this space to provide any further comments on proposed changes to Aquatics fees**
- not answered
- Q12. **What is your position on proposed changes to sport and recreation membership and sports programme fees?** Neutral
- Q13. **Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?**
- not answered
- Q14. **What is your position on proposed changes to Community Facility fees?** Neutral

Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees

not answered

Q16. What is your position on proposed changes to Parks and Reserve fees? Neutral

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Neutral

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Oppose

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

There is so little parking and the costs are already exceedingly high

Q22. What is your position on proposed changes to Mooring fees? Neutral

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Neutral

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Neutral

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 5
Login: Anonymous

Responded At: May 01, 2024 05:09:53 am
Last Seen: May 01, 2024 05:09:53 am

Q1. First name	Damon
Q2. Surname	Williams
Q3. Organisation (if any)	Universe Boss
Q4. Contact email	[REDACTED]
Q5. Location	Fernhill/Sunshine Bay (Queenstown-Whakatipu ward)
Q6. Do you wish to speak at a hearing in support of your submission?	Yes
Q7. If yes, please provide a contact phone number	[REDACTED]
Q8. What is your position on proposed changes to Environmental Health fees?	Oppose
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	Oppose
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	Oppose
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	Oppose
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	Oppose

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? Oppose

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? Oppose

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? Oppose

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? Oppose

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

How about the council stops squandering money on it's excessive amount of consultants and office bodies before it passes on costs to the public.

Q29. If you have a pre-prepared submission you can upload it here not answered

Q30. I understand that my submission is considered public information I understand



Respondent No: 50
Login: Admin

Responded At: May 08, 2024 13:55:59 pm
Last Seen: May 08, 2024 03:54:11 am

Q1. First name	Gary
Q2. Surname	Wright
Q3. Organisation (if any)	not answered
Q4. Contact email	[REDACTED]
Q5. Location	Other (please specify) Unknown
Q6. Do you wish to speak at a hearing in support of your submission?	Yes
Q7. If yes, please provide a contact phone number	TBC
Q8. What is your position on proposed changes to Environmental Health fees?	not answered
Q9. Please use this space to provide any further comments on proposed changes to Environmental Health fees	not answered
Q10. What is your position on proposed changes to Aquatics fees?	not answered
Q11. Please use this space to provide any further comments on proposed changes to Aquatics fees	not answered
Q12. What is your position on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q13. Please use this space to provide any further comments on proposed changes to sport and recreation membership and sports programme fees?	not answered
Q14. What is your position on proposed changes to Community Facility fees?	not answered
Q15. Please use this space to provide any further comments on proposed changes to Community Facility fees	not answered
Q16. What is your position on proposed changes to Parks and Reserve fees?	not answered

Q17. Please use this space to provide any further comments on proposed changes to Parks and Reserve fees

not answered

Q18. What is your position on proposed changes to Library fees? not answered

Q19. Please use this space to provide any further comments on proposed changes to Library fees

not answered

Q20. What is your position on proposed changes to Parking fees in the Queenstown Town Centre? not answered

Q21. Please use this space to provide any further comments on proposed changes to Parking fees in the Queenstown Town Centre

not answered

Q22. What is your position on proposed changes to Mooring fees? Oppose

Q23. Please use this space to provide any further comments on proposed changes to Mooring fees

not answered

Q24. What is your position on proposed changes to Wānaka Airport Landing Fees? not answered

Q25. Please use this space to provide any further comments on proposed changes to Wānaka Airport fees

not answered

Q26. What is your position on proposed changes to Planning and Development fees? not answered

Q27. Please use this space to provide any further comments on proposed changes to Planning and Development fees

not answered

Q28. Do you have any other feedback relating to Council fees and charges?

not answered

Q29. If you have a pre-prepared submission you can upload it here https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/87e9caa0b48934881199a41fa1c6292b958b89ef/original/1715140554/9ac737e7c4985d4780907d4e9d8b9a86_Wright_Geoff_attachment.pdf?1715140554

Q30. I understand that my submission is considered public information I understand

**Submission to proposed changes to user fees and charges contained in QLDC
Statement of Proposal dated 5 April 2024**

To: QLDC by e-mail letstalk@qldc.govt.nz

Submitter name: Garry Wright

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

Statement of proposal and rationale for increase

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

The reasons do not justify the increase

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.¹
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.² This involves checking the chain and mooring blocks.³ QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.⁴
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.⁵
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.⁶

¹ The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

² See QLDC Swing Moorings Booklet, August 2022

³ This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

⁴ Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

⁵ Refer QLDC Swing Moorings Booklet, August 2022

⁶ Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.⁷
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

I seek the following outcome:

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I ~~do not~~ (delete one) wish to appear and speak in support of my submission at the hearing.



a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

⁷Clause 47.4 of the Bylaw